

October 17, 2013

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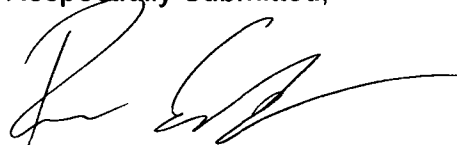
**Re: Strata Energy, Inc. Ross ISR Project Safety Evaluation Report Suggested
Typographical Corrections, Docket No. 040-09091**

To Whom It May Concern:

By this letter, WWC Engineering, on behalf of Strata Energy, Inc. (Strata), submits the enclosed suggested typographical corrections to the Safety Evaluation Report (SER) for the Ross ISR Project, Crook County, Wyoming, Material License No. SUA-1601. Based on the suggested changes to the SER, Strata is also providing corrections to the Technical Report (TR) for the Ross ISR Project. Strata evaluated the use of "would" in the TR and found that it is used in four different contexts: 1) conditional; 2) factual; 3) speculation; and 4) reiterating a previous commitment. Strata's suggested typographical edits to the TR address "would" in the speculation context by proposing that 'would' be replaced with 'will'. We respectfully request that the NRC evaluate these proposed changes to the TR. Upon approval, TR replacement pages will be provided to the NRC along with an index of change.

If you have any questions or comments, please do not hesitate to contact me or Mike Griffin at your convenience. Thank you for your time and consideration in this matter.

Respectfully Submitted,



Benjamin J. Schiffer, P.G.
Project Manager

BK/lld

Enclosures: As noted

cc: John Saxton, NRC Safety Review Manager (*via email*)
Mike Griffin, Strata Energy (*via email*)
Chris Pugsley, Thompson & Pugsley, PLLC (*via email*)

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Ross ISR Project, Safety Evaluation Report
Suggested Typographical Corrections
Prepared by Strata Energy, Inc., October 2013

The following are suggested typographical corrections to the SER dated February 2013.

1. p. 10, 5th ¶, suggest deleting Section 17, T53N, R67W
2. p. 11, 2nd ¶, line 4, suggest changing “two or three dozen” to “15 to 25”
3. p. 13, 1st ¶, line 3, suggest adding “or Agreement State-licensed facility”
4. p. 14, 3rd full ¶, line 1, suggest deleting “would”
5. p. 21, 2nd full ¶, line 5, suggest changing “IM” to “IML”
6. p. 28, 3rd full ¶, line 1, suggest changing “deem” to “deemed”
7. p. 30, 1st bullet, suggest changing “colluviums” to “colluvium”
8. p. 31, 1st ¶, line 7, suggest changing “Irrigaray” to “Irigaray”
9. p. 33, 1st full ¶, line 7, suggest deleting “6” from “...listed by the applicant.6”
10. p. 55, 1st full ¶, line 2, suggest adding “on” between “depends” and “the”
11. p. 63, 3rd full ¶, line 2, suggest changing “0.8” to “0.08”
12. p. 64, 4th full ¶, line 6, suggest changing “12-18” to “21-19”
13. p. 71, 2nd full ¶, line 11, suggest changing “wellfield packages” to “initial wellfield package” for consistency with Draft SUA-1601, license condition 10.13
14. p. 77, 6th ¶, line 9, suggest changing “conduct” to “conducted”
15. p. 78, 3rd full ¶, lines 1 and 2, suggest changing “wellfield packages” to “initial wellfield package” in both occurrences for consistency with Draft SUA-1601, license condition 10.13
16. p. 84, footnote 29, suggesting changing “19xx18” to “19XX18”
17. p. 90, 2nd ¶, line 4, suggest changing “maintains” to “maintained”
18. p. 100, 4th full ¶, line 4, suggest changing “regulations” to “guidances”
19. p. 109, Table 2.5-1, suggest deleting “X” for Radon-222 in Surface Water and Reservoirs
20. p. 139, Figure 2.4-6 title, suggest changing “Mao” to “Map”
21. p. 144, Figure 2.5-1 title, suggest adding “of” in between “Map” and “Surface”
22. p. 149, 5th bullet, suggest changing “40” to “140”
23. p. 149, 9th bullet, suggest adding “up to” before “5”
24. p. 149, 11th and 12th bullet, suggest changing “elusion” to “elution”
25. p. 149, 13th bullet, suggest changing “dewater” to “dewatering”
26. p. 157, 3rd full ¶, line 2, suggest changing “stagger” to “staggered”
27. p. 158, 1st full ¶, line 7, suggest changing “The applicant commits to re-enter all drill holes within 0.25-mile of perimeter ring and abandon them in accordance with its SOP prior to conducting principal activities at a wellfield” to “Prior to conducting tests for a wellfield data package, the applicant will attempt to locate and abandon all historic drill holes located within the perimeter well ring for the wellfield” for consistency with Draft SUA-1601, license condition 10.12
28. p. 158, 3rd full ¶, lines 3 and 4, suggest deleting “or, at a minimum, the completed interval reduced from entire Fox Hills/Lance aquifer to one of the applicant’s designated aquifers (SM, Oz, or DM aquifer)”
29. p. 159, 1st full ¶, line 2, suggest adding a space in “of15”
30. p. 161, 5th ¶, line 3, suggest deleting second period in “rich..”

31. p. 163, last ¶, line 1, suggest changing “daily” to “weekly” for consistency with Draft SUA-1601 license condition 10.14
32. p. 167, 1st full ¶, line 7, suggest changing “made” to “may”
33. p. 173, Table 3.1-1, suggest changing pH range from “<6 to 8” to “>6 to 8” (refer to the response to TR RAI Admin(g))
34. p. 173, Table 3.1-1 source, suggest changing source from “(Strata, 2011a)” to “(Strata, 2012b)”
35. p. 177, Table 3.2-2 source, suggest changing source from “(Strata, 2011a)” to “(Strata, 2012b)”
36. p. 178, Table 3.2-2 source, suggest changing source from “(Strata, 2011a)” to “(Strata, 2012b)”
37. p. 183, 1st ¶, line 4, suggest adding a space in “1999a;2012a”
38. p. 188, 3rd full ¶, line 1, suggest changing “... the applicant proposes treatment of portion...” to “the applicant proposes treatment of a portion...”
39. p. 189, 1st ¶, line 3, suggest changing “used” to “use”
40. p. 191, 5th ¶, line 2, suggest changing “industry” to “point source category”
41. p. 198, 2nd full ¶, line 7, suggest changing “compact” to “compacted”
42. p. 201, 1st ¶, line 10, suggest changing “Sstaff” to “Staff”
43. p. 201, 3rd ¶, line 5, suggest changing “sight” to “side”
44. p. 201, last ¶, line 3, suggest changing “overflow” to “overflow”
45. p. 206, 1st ¶, line 1, suggest deleting “appropriately”
46. p. 217, 4th ¶, line 1, suggest changing “Radiation” to “radiation”
47. p. 218, 1st ¶, line 3, suggest changing “48 hours” to “24 hours” for consistency with Draft SUA-1601 license condition 11.6
48. p. 218, 3rd ¶, line 7, suggest changing “...to ensure that no unapproved disturbance occurs” to “to ensure that no unapproved disturbance of cultural resources occurs” for consistency with Draft SUA-1601 license condition 9.8
49. p. 221, last ¶, line 7, suggest adding a period after “pond,” deleting “would be conducted by” and changing “daily” to “Daily”
50. p. 223, 5th ¶, line 5, suggest deleting “provide”
51. p. 224, 1st full ¶, line 5, suggest deleting “provide”
52. p. 245, 1st full ¶, line 5, suggest changing “approval” to “verification” for consistency with Draft SUA-1601 license condition 12.9
53. p. 247, 3rd ¶, line 1, suggest changing “Section 5.7.4.1” to “Section 5.7.3.1”
54. p. 260, 3rd full ¶, line 5, suggest deleting space in “Pb-2 10”
55. p. 261, last ¶, lines 4 and 5, suggest changing “...collect sediment samples at the same location as surface water samples to a depth of 152 cm (60 in) annually” to “collect sediment samples during a runoff event in the pump samplers, installed at the surface water monitoring stations between April and October” (refer to TR Section 5.7.7.1.2)
56. p. 267, 2nd full ¶, 1st sentence, suggest changing “... water supply wells within a 2-kilometer radius of the Ross Project boundary” to “water supply wells within 2-kilometers of the perimeter ring monitoring wells for all wellfields” to be consistent with Draft SUA-1601 license condition 11.1(D)
57. p. 268, 4th full ¶, lines 4 and 5, suggest changing “Based on the applicant’s responses to RAIs (Strata, 2012b), the applicant commits to one baseline well per wellfield module” to “Based on the applicant’s responses to RAIs (Strata, 2012b), to the extent possible, the

applicant commits to one baseline well per wellfield module” (refer to the response to TR RAI 38)

58. p. 270, 1st full ¶, line 4, suggest changing “impact” to “impacted”
59. p. 270, 1st full ¶, line 8, suggest changing “reduce” to “reduced”
60. p. 271, 1st full ¶, line 1, suggest changing “applicants” to “applicant”
61. p. 271, 2nd full ¶, 9th line, suggest deleting “and a minimum of six baseline wells for a Wellfield (Mine Unit)” since the statement is not consistent with Draft SUA-1601 license condition 11.3(A)
62. p. 271, 2nd full ¶, last sentence, suggest changing “DM, SM and SA” to “DM and SM” for consistency with Draft SUA-1601 license condition 11.3(C)
63. p. 271, last ¶, line 4, suggest changing “abandoned” to “abandon”
64. p. 271, last ¶, last line, suggest deleting “for low”
65. p. 272, 2nd full ¶, line 4, suggest changing “thinnest” to “thickness”
66. p. 272, 3rd full ¶, line 8, suggest adding “of” between “levels” and “sulfate”
67. p. 272, 4th full ¶, line 1, suggest changing “al” to “all”
68. p. 273, 1st full ¶, line 2, suggest changing “48 hours” to “24 hours” for consistency with Draft SUA-1601 license condition 11.5
69. p. 273, 4th full ¶, line 2, suggest changing “conditions” to “condition”
70. p. 273, 5th full ¶, line 1, suggest changing “proposed the applicant” to “proposed by the applicant”
71. p. 273, last ¶, line 4, suggest changing “SPP” to “CPP”
72. p. 275, 4th ¶, line 9, suggest changing “dewater” to “dewatering”
73. p. 276, 1st full ¶, lines 1 and 2, suggest changing “water supply wells within 2 km of the Ross Project” to “water supply wells within 2 kilometers of the perimeter ring monitoring wells for all wellfields” to be consistent with Draft SUA-1601 license condition 11.1(D)
74. p. 276, 5th full ¶, line 3, suggest adding “wells” between “monitoring” and “are”
75. p. 277, 3rd full ¶, line 4, suggest changing “operation” to “operational”
76. p. 283, 3rd full ¶, line 5, suggest changing “acquire” to “acquired”
77. p. 283, 3rd full ¶, line 9, suggest changing “prior obtaining a license” to “prior to obtaining a license”
78. p. 284, 2nd full ¶, lines 3 and 4, suggest changing “submit wellfield data package(s) to NRC for review and verification” to “submit the initial wellfield data package to NRC for review and verification” for consistency with Draft SUA-1601 license condition 10.13
79. p. 294, 3rd ¶, line 4, suggest adding “plan” after “restoration”
80. p. 295, 3rd full ¶, line 1, suggest changing “will” to “may” since TR Section 6.1.2 indicates that not all phases of groundwater restoration will be used if deemed unnecessary by Strata
81. p. 295, last ¶, line 8, suggest changing “seep” to “sweep”
82. p. 296, 5th full ¶, last line, suggest adding a reference for the statement “(generally up to 300 years) and longer”
83. p. 297, 3rd full ¶, line 5, suggest changing “Irrigaray” to “Irigaray”
84. p. 299, 3rd ¶, line 5, suggest changing “... for the baseline parameters listed in SER Table 5.7-2” to “for all excursion parameters and the static water level will be recorded at each monitoring well” (refer to TR Section 6.1.2.5)

85. p. 299, 3rd ¶, last sentence, suggest changing “perimeter wells and overlying and underlying aquifer wells” to “wellfield production zone baseline wells” since the monitor well will only be monitored for the excursion parameters (refer to TR Section 6.1.2.5)
86. p. 300, 1st full ¶, line 2, suggest changing “for each wellfield module” to “at a wellfield as measured from the surrounding perimeter ring monitoring well” for consistency with Draft SUA-1601 license condition 10.7
87. p. 305, 1st full ¶, line 4, suggest deleting “surface” before “pre-construction”
88. p. 311, 4th ¶, last line, suggest changing “... a plan to identify the principal radionuclides in the effluent from the ISR process” to “... an airborne effluent and environmental monitoring program” for consistency with Draft SUA-1601 license condition 12.7
89. p. 312, 2nd ¶, last sentence, suggest deleting the sentence and reference to license condition 12.9 since the reference is incorrect and there are no license conditions in Draft SUA-1601 for soil cleanup criteria
90. p. 315, 2nd ¶, first sentence, suggest capitalizing the “p” in “planned”
91. p. 318, 1st ¶, line 7, suggest deleting “reasonable”

Ross ISR Project Technical Report (TR)
Suggested Typographical Corrections
Prepared by Strata Energy, Inc., October 2013

The following are suggested typographical corrections to the TR dated December 2010 and revised in April 2012 and January 2013:

1. p. 3-15, 1st ¶, last sentence, suggest changing “would” to “will” in the following statement: “Well efficiency deviations would be measured utilizing data from the injection manifolds.”
2. p. 4-23, 2nd ¶, 2nd sentence, suggest changing “would” to “will” in the following statement: “At a minimum, these would include a flow totalizer, flow rate, pressure regulator, pressure indicator, pressure switch, annular tank level indicator and injection pressure chart recorder.”
3. p. 5-69, 2nd ¶, 5th sentence, suggest changing the first occurrence of “would” to “will” in the following statement: “If the ALARA objective of background cannot be achieved without more extensive and potentially abrasive methods, the methods and release limits specified in Regulatory Guide 8.30, Section 2.6 would be used and all detected activity would be assumed to be removable.”
4. p. 5-88, 1st full ¶, last sentence, suggest changing “would” to “will” in the following statement: “Based on the pore volume impacted, the financial assurance estimates would be increased and included within both the quarterly NRC reporting as well as in the annual reports for NRC and WDEQ/LQD.”
5. p. 5-88, 2nd full ¶, 1st sentence, suggest changing “would” to “will” in the following statement: “Financial assurance estimates in the unlikely event of a vertical excursion would again utilize a modeling platform along with aquifer specific hydraulic and physical characteristics to determine the magnitude of the incident.”
6. p. 5-90, 2nd full ¶, last sentence, suggest changing “would” to “will” in the following statement: “However, in the unlikely event that water level data indicate this potential the following procedures would be initiated in accordance with NRC and LQD regulations.”
7. p. 5-91, 3rd full ¶, 1st and 2nd sentences, suggest changing “would” to “will” in the following statements: “In addition to the above corrective actions, the monitor well on excursion status would be sampled weekly. An excursion would be considered concluded when the concentrations of excursion indicators do not exceed the criteria defining an excursion for three consecutive samples.”
8. p. 5-91, last ¶, last sentence, suggest changing “would” to “will” in the following statement: “The surety increase would remain in force until the excursion is...”
9. p. 6-15, 3rd full ¶, last sentence, suggest changing “would” to “will” in the following statement: “In addition to the typical transition criteria listed above, the following four conditions would trigger NRC notification of decommissioning (restoration) activities:”
10. p. 7-94, 1st ¶, 1st full sentence, suggest changing “would” to “will” in the following statement: “Uranium-loaded IX resin would be transported to the Ross ISR Project in tanker trailers with 500 cubic-foot capacity.” Also suggest changing “500 cubic-foot capacity” to “standard resin capacity” in the sentence.
11. p. 7-94, 1st full ¶, last sentence, suggest changing “would” to “will” in the following statement: “If an accident occurred with loaded resin the impacted soils would be salvaged and shipped to a licensed 11e.(2) byproduct material disposal site, the topsoil and vegetation would be replaced, and Strata would perform a post-reclamation radiological survey to verify that no long-term hazards would be present.”

Subject: Ross ISR Project, Docket #40-09091, SER Typographical Errors and Suggest TR Changes

From: Ben Schiffer <bschiffer@wwcengineering.com>

Date: 10/17/2013 5:05 PM

To: "Saxton, John" <John.Saxton@nrc.gov>

CC: Mike Griffin <MGriffin@stratawyo.com>, Chris Pugsley <cpugsley@athompsonlaw.com>

John--

We are glad to hear that NRC is back to work. As we have discussed, please find the attached cover letter, SER typos and proposed changes to the Technical Report. A hard copy has been sent to the Document Control Desk as requested. Let Mike Griffin or I know if you have any questions. Thanks.

Ben

—Attachments: —

101713_Ross_ISR_SERTypos_.pdf

722 KB