

CROW BUTTE RESOURCES, INC.



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to the questions with the worker until worker understanding is achieved. Workers who fail the exam are retested, and test results remain on file.

5.6.3 On-The-Job Training

5.6.3.1 Health Physics Technician

On-the-job training is provided to HPTs in radiation exposure monitoring and exposure determination programs, instrument calibration, plant inspections, posting requirements, respirator programs, and health physics procedures contained in the SHEQMS Program Volume IV, *Health Physics Manual*.

5.6.4 Refresher Training

Following initial radiation safety training, all permanent employees and long-term contractors receive ongoing radiation safety training as part of the annual refresher training and, if determined necessary by the RSO, during monthly safety meetings. This ongoing training is used to discuss problems and questions that have arisen, any relevant information or regulations that have changed exposure trends, and other pertinent topics.

5.6.5 Training Records

Records of training are kept for 5 years for all employees trained as radiation workers (occupationally exposed employees).

5.6.6 Qualifications and Requirements for Daily Inspections

The Crow Butte Resources RSO will qualify Designated Operators to conduct daily walkthrough inspections of all work and storage areas at the Crow Butte Plant and associated satellite facilities. The Designated Operators will only conduct the inspections on weekends and holidays when neither the RSO or HPT is present. With the exception of the Thanksgiving holiday, the Designated Operator will not conduct the inspections for more than two days per week (three days if a Federal holiday falls on Friday or Monday). For the Thanksgiving holiday only, the Designated Operator may perform the daily inspections for four consecutive days.

Any problems noted by the Designated Operator during the daily inspection will be recorded on an inspection form, signed and dated, and retained on file. The RSO will review the inspection forms and take appropriate action to correct any noted problems.

A qualified Designated Operator has no authority for the development and administration of the radiation protection program, other than conducting daily inspections (emphasis added). He may not approve plans for new equipment, process changes, or changes in operating procedures that might affect the radiation protection program. He will not conduct radiation safety audits or make determinations about personnel dosimetry. A qualified Designated Operator may not authorize non-routine maintenance jobs involving potential for personnel radiation exposure or radioactive contamination for which there are not standard operating procedures nor an existing radiation work permit. The

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designated operator will not have the authority to release materials for unrestricted use. In the event of an emergency, the on-call RSO or HPT will be responsible for radiation protection decisions.

At the Crow Plant and satellite facilities, the only activity required to be performed by the RSO or HPT on a daily basis is the daily inspection. Instrument calibrations are performed on a weekly basis, during the regular workweek by the RSO or HPT. For that reason it is not necessary for the, Designated Operator to perform any other RSO or HPT function on weekends or holidays.

The Designated Operator will observe, through visual inspection, radiation safety practices, housekeeping and implementation of the radiation safety program throughout the plant/satellite. Such duties include, but not be limited to, inspecting for compliance with radiation safety postings, contamination control, proper control point ingress and egress, control of airborne radioactivity, worker protection practices in the yellowcake drying and packaging area, and proper storage of byproduct material.

5.6.6.1 Minimum Qualifications for Designated Operators

Before a Designated Operator may conduct such inspections, he must be qualified by reason of training and experience to observe proper implementation of good radiation safety practices. In addition to the annual radiation worker training required by Regulatory Guide 8.31, Section 2.5, the operator seeking designation must not only complete one-time training specific to daily inspections, but also demonstrate proficiency. The additional training will emphasize how the inspections affect employee safety and contamination control.

At a minimum, the operator seeking designation must have the following combination of education, training and experience:

Education: a high school diploma or equivalent

Training: New employee radiation safety training, including guidance pertinent to prenatal radiation exposure (Regulatory Guide 8.13) and instruction concerning risks from occupational radiation exposure (Regulatory Guide 8.29); and additional training specific to conducting daily inspections at Crow Butte ISR facilities. In addition, the Designated Operator will be required to demonstrate proficiency during daily inspections to the RSO. Specifics on the additional training and the proficiency demonstration are provided below in the technical basis.

Experience: A minimum of three months work experience in operations or maintenance at a uranium recovery facility, including procedures that involve health physics, industrial safety or industrial hygiene at a uranium recovery facility to demonstrate qualification is required.

5.6.6.2 Additional Training for Designated Operators

The additional radiation safety training afforded to operators seeking designation involves four hours training and a test with an 80% passing grade, but does not include the more advanced topics required for the facility RSO or HPT.



The additional training for Designated Operator includes the following topics:

1. Employee PPE usage
2. Personal contamination control (ingress and egress)
3. Radiation area boundaries
4. Signage
5. Labeling
6. Leaks
7. Yellowcake spillage
8. Ventilation
9. General housekeeping
10. Reporting procedures specific to type of finding (e.g. how and when to contact the on-call RSO or HPT)
11. Completion and control of the daily inspection form

5.6.6.3 Demonstration of Proficiency

Upon completion of training and prior to designation, an operator will be required demonstrate to the RSO an understanding of and proficiency in conducting the daily inspections. Prior to performing inspections, the operator seeking designation will perform a minimum of four (4) daily inspections under the supervision of the RSO or HPT. The supervised inspections will cover the training topics listed above and will be documented with signatures of the RSO or HPT and the operator seeking designation on the daily inspection form. An operator who fails to qualify will be re-evaluated after performing additional supervised inspections until proficiency is demonstrated to the satisfaction of the RSO.

5.6.6.4 Documentation

The designation process will be documented in a file which includes, education, training results with a passing test score and signed supervised daily inspection forms. The designation itself will be co-signed by the designated operator and the RSO when the RSO is satisfied that the training and supervised inspections demonstrate proficiency.

5.6.6.5 Maintaining Designated Operator Status

To remain qualified, the Designated Operators must complete an annual refresher training which addresses the same topics covered in the additional training described above. A test will be given with a required passing grade of 80%. In addition, the Designated Operator must complete at least two (2) supervised inspections performed semiannually under the direct supervision of the RSO or HPT.