CROW BUTTE RESOURCES, INC.



SUA - 1534 License Renewal Application

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 <u>covering the topics described below</u> with an 80% passing grade, but does not include the more advanced topics required for the facility

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