



May 15, 2014

Attn: Document Control Desk  
Director, Office of Federal and State Materials and  
Environmental Management Programs  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

Attn: Document Control Desk  
U.S. Nuclear Regulatory Commission  
Deputy Director, Decommissioning and Uranium Recovery Licensing Directorate  
Division of Waste Management and Environmental Protection  
Office of Federal and State Materials and Environmental Management Protection  
Mail Stop T-8F5  
11545 Rockville Pike  
Two White Flint North  
Rockville, MD 20852-2738

RE: Uranerz Energy Corporation, Nichols Ranch Project, Source Materials License SUA-1597, Docket  
No. 40-9067, License Condition 12.5

Dear Mr. Director and Deputy Director,

Uranerz Energy Corporation (Uranerz) proposes to train plant operators and other suitable personnel to perform the daily inspections required in Regulatory Guide 8.31. NRC Regulatory Guide 8.31, Information Relevant to Ensuring that Occupational Radiation Exposures at Uranium Recovery Facilities will be As Low As is Reasonably Achievable, states:

“The RSO or designated health physics technician should conduct a daily walk –through (visual) inspection of all work storage areas of the facility to ensure proper implementation of good radiation safety procedures, including good housekeeping and cleanup practices that would minimize unnecessary contamination.”

Uranerz, through the Radiation Safety Department, proposes to train and utilize personnel such as plant operators to perform the daily inspections during the temporary absence of radiation safety staff that occurs during routine days off and holidays. The training program and qualification for personnel to perform daily radiation safety facility inspections is attached for NRC review.

Once the training program is reviewed by the NRC and implemented, Uranerz radiation safety staff will continue to perform the daily inspection except on days when radiation safety staff is not present because of normal days off or holidays. The radiation safety staff will then follow-up and review the reports done by the qualified employees on the next returning work day.

FSME20

If you should have any questions regarding this matter or this proposed plan, please contact me by phone at 307-265-8900 or by e-mail at [mthomas@uranerz.com](mailto:mthomas@uranerz.com).

Sincerely,



Mike Thomas  
Vice President Regulatory and Public Affairs  
Uranerz Energy Corporation

MT/al

Attachment

cc: Ron Linton, Project Manager, NRC  
Linda Gersey, Lead Inspector, NRC

# URANERZ ENERGY CORPORATION

Revision Number: New  
Effective Date: March 25, 2014

Document: TRN-LOG-40  
Approved By: 

## OPERATOR INSPECTION TRAINING

Regulatory Guide 8.31 requires daily walk through (visual) inspections of all work and storage areas of the facility to ensure proper implementation of good radiation safety procedures, including good housekeeping and cleanup practices that would minimize unnecessary contamination. These daily inspections are typically conducted by the radiation protection staff, however during weekends or holidays trained operation personnel perform these inspections. Reports from operational personnel are reviewed by health physics staff within 48 hours of completing the report unless a holiday falls on a Friday or Monday in which it is 72 hours. Reports of daily inspections are recorded on the Radiological Safety Plant Inspection (RAD-LOG-16) log sheet.

Training of operational personnel to perform daily visual inspections is in accordance with the Task Training (SFT-SOP-31). Task training procedures require each employee to be trained by a qualified individual on the given standard operating procedures and then follow up training occurs within 6 months. Operational personnel are trained on how to perform daily inspections according to As Low As Reasonable Achievable (ALARA) Program (RAD-SOP-02) and Routine Environmental, Safety, and Health Inspections (ADM-SOP-01) which outline how to perform these inspections. Training includes discussion of items covered during inspections, accompanying qualified radiation personnel during inspections, and demonstration of learned concepts. Reevaluation of training is performed within 6 months of initial training and at least annually thereafter. Documentation of training is kept in each individual's employee file.

A trainee is responsible for the basic understanding of required inspection items necessary to maintain exposures ALARA. The trainee must demonstrate competence in the understanding and execution of inspection requirements before they are allowed to perform inspections without radiation protection staff present. Trainees are considered competent and approved to perform site inspections when signed by both the trainer and trainee.

### Procedure Review and Supervised Inspections

Procedures are reviewed with the trainee to provide sufficient knowledge of inspection requirements and expectations.

	Trainee	Trainer	Date	6 Mo.
Review RAD-SOP-02 with operator(s)				
Review ADM-SOP-01 with operator(s)				
Review RAD-LOG-16 with operator(s)				
Application of ALARA during inspections				
Observed inspection with a Radiation Safety Officer (RSO) and Trainee				
Observed inspection with an RSO and Trainee				

**URANERZ ENERGY CORPORATION**

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Observed inspection with an RSO and Trainee				
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**Inspection Details**

	Trainee	Trainer	6 Mo.
Control room clean, no visible contamination, housekeeping			
Resin bay clean, absent of resin spillage, equipment leaks, and visual surface contamination			
Lamella no visible spill or leaks including spillage from super sack			
Filter Press no visible spills or leaks			
Floor and Sumps, free of standing solution, pumps are working properly, and grating is in place			
Plant, no pipe or transfer ducting leakage is observed, visual surface contamination is absent, no process water is accumulated on the floor			
Ventilation exhausts are operating, if tanks are being ventilated they are being vented to the outside			
CPP Doors are locked, keypad is functioning.			
Bay doors, baby gates are used when opened			
Monitoring stations functioning properly, utilized by all personnel exiting restricted areas			
OSL badges, on shift personnel wearing badges, off shift personnel badges are on the control board.			
Personnel using PPE appropriately for given task			
General Housekeeping			
Other observations			

The trainee is responsible for the basic understanding of radiation, contamination, airborne radioactive particulates, radon and measures to maintain exposures ALARA. The trainee demonstrates competency in the understanding and execution of inspection requirements. Trainees are considered competent and approved to perform site inspections when signed by both the trainer and trainee.

Date Training Completed: \_\_\_\_\_

Plant Operator Trainee: \_\_\_\_\_ (print)

\_\_\_\_\_ (signature)

Radiation Safety Officer: \_\_\_\_\_ (print)

\_\_\_\_\_ (signature)