

**UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION**

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of:)	
)	
)	Docket No.: 40-9075-MLA
POWERTECH (USA), INC.)	
)	Date: June 2, 2014
)	
(Dewey-Burdock In Situ Uranium Recovery)	
Facility))	
_____)	

**LICENSEE POWERTECH (USA) URANIUM CORPORATION'S UPDATE TO
INITIAL MANDATORY DISCLOSURES**

Pursuant to 10 C.F.R. § 2.336(a) & (b), Powertech (USA), Inc. (Powertech) hereby submits this June 2, 2014 update to its initial mandatory disclosures for this proceeding:

1. Potential Testifying Witnesses

On September 13, 2010 and pursuant to 10 C.F.R. § 2.336(a)(1), Powertech submitted its initial mandatory disclosures, including a list of organizations (e.g., consultants, etc.) from which testimony may be solicited during the hearing process. Powertech expressly noted in that submission that

“its proposed potential witness list includes the name of one person from each company or organization that potentially may be called upon to offer expert witness testimony in this proceeding. In the future, the identified person may designate a member of his/her company or organization to offer expert testimony based on his/her specific area of expertise.”

See Applicant Powertech (USA) Uranium Corporation's Initial Mandatory Disclosures (September 13, 2010).

As the scope of the admitted contentions and the allegations levied therein have become fully understood (absent summary disposition), by this filing, Powertech submits its final witness list, which may or may not include previously identified witnesses and which are included for ease of

reference. It should be noted that these witnesses may or may not offer written testimony which is due June 20, 2014 and/or at the August 19-21, 2014 evidentiary hearing. In the event that this list requires amendment prior to the submission of written testimony on June 20, 2014,

Powertech will supplement or amend the list accordingly:

A. Archaeology Laboratory, Augustana College

Address: 2032 S. Grange Avenue
Sioux Falls, SD 57105
(605) 274-5493

Person or Person(s): Dr. L. Adrien Hannus, Director

B. Petrotek Engineering Corporation

Address: 5935 South Zang Street, Suite 200
Littleton, CO 80127
(303) 290-9414

Person or Person(s): Hal Demuth, Senior Engineer/Principal
Errol Lawrence, Senior Hydrologist

C. Powertech (USA) Inc.

Address: 5575 DTC Parkway, Suite 140
Greenwood Village, CO 80111
(303) 790-7528

Person or Person(s): Dick Clement, Chief Executive Officer
John Mays, Chief Operating Officer
Frank Lichnovsky, Chief Geologist
Lisa Scheinost, Licensing & Environmental Compliance Engineer

D. RESPEC

Address: 3824 Jet Drive
Rapid City, SD 57703-4757
(605) 394-6400

Person or Person(s): Cory Foreman, Manager, Water Resources

E. SRI Foundation

Address: 333 Rio Rancho Drive NE, Suite 103
Rio Rancho, NM 87124
(505) 892-5587

Person or Person(s): Dr. Lynne Sebastian, Director, Historic Preservation Program

F. Thunderbird Wildlife Consulting, Inc.

Address: 5303 Van Ripper Street
Gillette, WY 82718-5111
(307) 686-6178

Person or Person(s): Gwyn McKee, President/Principal Biologist

G. IML Air Science

Address: 555 Absaraka Street
Sheridan, WY 82801
(307) 674-7506

Person or Person(s): Ronn Smith, Project Engineer

H. Ur-Energy Inc.

Address: 5880 Enterprise Drive, Suite 200
Casper, WY 82609

Person or Person(s): James Bonner, Vice President, Geology

I. BKS Environmental Associates, Inc.

Address: P.O. Box 3467
612 N. Hwy. 14-16
Gillette, WY 82717
(307) 686-0800

Person or Person(s): Dr. Brenda Schladweiler, President

J. WWC Engineering

Address: 1849 Terra Ave
Sheridan, WY 82801
(307) 672-0761

Person or Person(s): Jack Fritz, Senior Environmental Engineer
Doyle Fritz, Senior Technical Advisor

K. SD Archeology Research Center

Address: Department of Tourism
South Dakota State Historical Society
Archeological Research Center
2425 E. Saint Charles St.
P.O. Box 1257
Rapid City, SD 57709-1257
(605) 394-1936

Person or Person(s): Michael Fosha, Assistant State Archeologist

2. Documents and Data Collections

Powertech's September 13, 2010 initial mandatory disclosure submission included a detailed breakdown of documents that potentially will be relied upon during the hearing process. Now that the scope of all admitted contentions are properly understood (absent summary disposition) and our witnesses identified above have commenced preparing initial position statements and written testimony, at this time, Powertech has identified several additional documents that may be relied upon in the course of this proceeding. A list of these documents is attached to this filing. At this time, Powertech also plans to rely on all documents that are considered to be part of the administrative record/record of decision, cited in previous pleadings (such as court cases or other NRC-prepared documents) or have previously been disclosed by NRC Staff in its past hearing file updates to the extent they are relevant to Powertech's case. In the event that additional documents are identified, Powertech will disclose them as expeditiously as possible.

Powertech plans to rely on this set of documents, data, and analyses during the merits-based portion of this administrative hearing, because they address each of the previously admitted contentions and the numerous allegations levied within their scope (absent summary disposition). The documents identified pertain to the expert testimony being offered by Powertech's expert witnesses and have been determined to be relevant to the written submissions intended to be provided over the course of the next two (2) months. To the extent that these documents are publicly available via electronic (internet) access or on the NRC's ADAMS database, appropriate location information has been provided. There are seven (7) documents that have been identified that are not readily available via these methods and, as such, they are being provided to all parties via mandatory electronic mail filing.

Respectfully submitted,

/Signed (electronically) by/ Christopher S. Pugsley

Anthony J. Thompson, Esq.
Christopher S. Pugsley, Esq.
Thompson & Pugsley, PLLC
1225 19th Street, NW, Suite 300
Washington, DC 20036
COUNSEL TO POWERTECH

Dated: June 2, 2014

**UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION**

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of:)	
)	
)	Docket No.: 40-9075-MLA
POWERTECH (USA), INC.)	
)	Date: June 2, 2014
)	
(Dewey-Burdock In Situ Uranium Recovery)	
Facility))	
_____)	

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing “**LICENSEE POWERTECH (USA) URANIUM CORPORATION’S UPDATE TO INITIAL MANDATORY DISCLOSURES**” in the above-captioned proceeding have been served via the Electronic Information Exchange (EIE) this 2nd day of June, 2014 which to the best of my knowledge resulted in transmittal of the foregoing to those on the EIE Service List for the above captioned proceeding.

Respectfully Submitted,

**/Executed (electronically) by and in
accord with 10 C.F.R. § 2.304(d)/
Christopher S. Pugsley, Esq.**

Anthony J. Thompson, Esq.
Christopher S. Pugsley, Esq.
Thompson & Pugsley, PLLC
1225 19th Street, NW
Suite 300
Washington, DC 20036
COUNSEL TO POWERTECH

Dated: June 2, 2011

