

**From:** [Holston, Coleda](#)  
**To:** [Castellon, Krupskaya](#)  
**Cc:** [Kalman, Kenneth](#)  
**Subject:** FW: Pre-license application meeting  
**Date:** Thursday, June 26, 2014 9:04:37 AM

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Hello Kc,

Can you enter this into ADAMS for Ken Kalman. See below.

Thank you,

Coleda

1. Please enter this email into adams.
2. Please draft a public meeting notice.

This is a pre-license application meeting with Rare Element Resources Inc to be held in T10A1 from 8:30am -4:00pm. They will be applying for a license for the possession of source material under 10 CFR part 40.

Thanks,

Ken

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**From:** Kalman, Kenneth  
**Sent:** Wednesday, June 25, 2014 2:59 PM  
**To:** Paul Bergstrom ([pbergstrom@rareelementresources.com](mailto:pbergstrom@rareelementresources.com))  
**Cc:** Norato, Michael ([Michael.Norato@nrc.gov](mailto:Michael.Norato@nrc.gov)); McLaughlin, Thomas; Clements, John; Kurian, Varughese; Guo, Lifeng; VonTill, Bill; Bjornsen, Alan; Holston, Coleda; Mandeville, Douglas; Stokes, Tracey  
**Subject:** Pre-license application meeting

Paul,

Rare Element Resources is scheduled for a July 30, 2014, pre-license application meeting with NRC staff at NRC headquarters in Rockville, MD beginning at 8:30 am in Two White Flint conference room T10 A1. This meeting will be noticed as open to the public. Wyoming Department of Environmental Quality and U.S. Forest Service will be participating by phone.

In addition to the guidance that Paul Michalak provided in his letter to you dated September 19, 2012, I am sending this email to help ensure that you have referred to appropriate guidance in preparing your license application. NRC does not have specific guidance for rare earth element projects such as yours, however the NRC staff noted many similarities between your project and a uranium milling operation and determined that the NRC guidance for uranium milling operations may be appropriate for your use.

After consultation with several NRC technical reviewers, the following list of potentially

useful guidance is being provided. Please understand that such a list is not all inclusive, and some of these regulatory guides may not completely apply. Ultimately, it is important that you comply with all applicable regulations, and regulatory guidance may provide a path to achieve compliance. A solid understanding of the quantity of radioactive materials at each step in your process should help you understand which guidance and regulations apply. There should also be an evaluation of the posting and delineation of radiologically controlled areas at the site, and plans for access controls, safety measures, and occupational monitoring should be developed. Additionally, you should consider the types of pre-operational and operational environmental and effluent monitoring that may be required for the proposed facility (Regulatory Guide 4.14 may be useful in that regard). Radiological waste management should be considered as well.

- Regulatory Guide 4.14 (Radiological Effluent and Environmental Monitoring at Uranium Mills)
- Regulatory Guide 8.11 (Applications of Bioassay for Uranium)
- Regulatory Guide 8.15 (Acceptable Programs for Respiratory Protection)
- Regulatory Guide 8.21 (Health Physics Surveys for Byproduct Material at NRC-Licensed Processing and Manufacturing Plants)
- Regulatory Guide 8.22 (Bioassay at Uranium Mills)
- Regulatory Guide 8.25 (Air Sampling in the Workplace)
- Regulatory Guide 8.30 (Health Physics Surveys in Uranium Recovery Facilities)
- Regulatory Guide 8.31 (Information Relevant to Ensuring that Occupational Radiation Exposures at Uranium Recovery Facilities Will Be as Low as Is Reasonably Achievable)
- Regulatory Guide 8.37 (ALARA Levels for Effluents from Materials Facilities)
- NUREG-1569 (Standard Review Plan for In Situ Leach Uranium Extraction License Applications) may help you understand some of the format and topics associated with a uranium license.

Also, as radiological licensing/radiation protection may be a somewhat new endeavor for your company, NUREG-1736 (Consolidated Guidance: 10 CFR Part 20 — Standards for Protection Against Radiation) may be useful as a radiation safety plan is developed.

During the pre-application meeting, the NRC staff expects you to present a detailed description of your operation including mining and processing at the Bull Hill mine, transportation to and from the Upton facility, operations at the Upton facility and waste disposal. We will also want to know the current status of your obtaining necessary permits from the State of Wyoming and the U.S. Forest Service.

I also note that when you submit the license application, it should also include an environmental report, radiation protection plan, and environmental monitoring plan.

I will also need you to provide me with:

1. A list of people you will be bringing to the meeting so I can register them for entrance into the NRC Building
2. A list of people participating by phone so I can provide them with a telephone bridgeline.
3. As in the past, you will have to bring a pc, if needed, and I will provide a projector.

Please contact me before the meeting if you have any questions.

Thank you,

Ken Kalman  
Project Manager