## September 10, 2014

Mr. Thomas E. Gieck, Remediation Leader Umecto Minerals Corporation 2754 Compass Drive, Suite 280 Grand Junction, CO 81506-8728

SUBJECT: REQUEST FOR APPROVAL OF RADIATION SAFETY OFFICER FOR

UMETCO'S GAS HILLS, WYOMING SITE (Docket No. 040-0299)

Dear Mr. Gieck:

I am writing in response to your letter dated August 13, 2014, requesting U.S. Nuclear Regulatory Commission (NRC) approval of Ms. Brittany Sandberg as the Radiation Safety Officer (RSO) for Umetco's Gas Hills Wyoming site (Agencywide Document Access and Management System (ADAMS) Accession Number ML14226A654).

In your letter you state that Ms. Sandberg meets the minimum qualifications outlined in Section 2.4.1 of Regulatory Guide 8.31. The requirement that the RSO meets the minimum qualifications outlined in Section 2.4.1 of Regulatory Guide 8.31 is a condition of Umetco's radioactive materials license (License Condition 14). Qualification number 3 in Section 2.4.1 of Regulatory Guide 8.31 states that the RSO shall have ".....at least 4 weeks of specialized classroom training in health physics specifically applicable to uranium recovery [UR]. In addition, the RSO should attend refresher training on UR facility health physics every 2 years."

In your letter you provided a description of Ms. Sandberg's training, experience and education, but it does not appear to include the 4 weeks of specialized training discussed in qualification number 3 of Section 2.4.1 of Regulatory Guide 8.31. Therefore, it does not appear that Ms. Sandberg meets the minimum qualifications outlined in the Regulatory Guide. In addition, the dates of Ms. Sandberg's previous work experience are unclear as the dates of many of her previous positions are not included in the work descriptions.

Unless Umetco can clarify how Ms. Sandberg meets all of the minimum qualifications in Section 2.4.1 of Regulatory Guide 8.31, Umetco will need to identify an individual that meets the minimum qualifications for an RSO specified in your radioactive materials license. Alternatively, you can request that your radioactive materials license be amended to change License Condition 14 to reflect the qualifications that Umetco feels are appropriate for the site at this time. If you chose to request that License Condition 14 be amended, the NRC staff will evaluate the new qualifications to determine if they are adequate for the Gas Hills site.

In accordance with 10 CFR 2.390 of the NRC's "Agency Rules of Practice and Procedure," a copy of this letter will be available electronically for public inspection in the NRC Public Document Room or from the Publicly Available Records component of NRC's ADAMS. ADAMS is accessible from the NRC Web site at http://www.nrc.gov/reading-rm/adams.html.

T. Gieck 2

If you have any questions concerning this letter, please contact me at 301-415-6749 or by e-mail at <a href="mailto:Dominick.Orlando@nrc.gov">Dominick.Orlando@nrc.gov</a>.

Sincerely,

/RA/

Dominick A. Orlando, Senior Project Manager Materials Decommissioning Branch Decommissioning and Uranium Recovery Licensing Directorate Division of Waste Management and Environmental Protection Office of Federal and State Materials and Environmental Management Programs

Docket No.: 40-0299 License No.: SUA-648 T. Gieck 2

If you have any questions concerning this letter, please contact me at 301-415-6749 or by e-mail at <a href="mailto:Dominick.Orlando@nrc.gov">Dominick.Orlando@nrc.gov</a>.

Sincerely,

Dominick A. Orlando, Senior Project Manager Materials Decommissioning Branch Decommissioning and Uranium Recovery Licensing Directorate Division of Waste Management and Environmental Protection Office of Federal and State Materials and Environmental Management Programs

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