

From: [Linton, Ron](#)
To: ["Mike Thomas"](#)
Subject: RE: HP Designee
Date: Wednesday, December 03, 2014 4:51:00 PM

Mike:

I checked on the progress of the review. Our Senior HP suggested that you review the following two programs (Crow Butte & Lost Creek (LCI) that have already been approved as they are very similar.

I hope this information proves useful.
Ron

This is license condition 9.7 that was just approved for the Crow Butte Renewal in November 5, 2014 (ML13324A101 in Package ML13324A090). It is very specific about designee's qualification and when they can be used.

9.7 The licensee shall follow the guidance set forth in NRC Regulatory Guides 8.22, "Bioassay at Uranium Mills" (as revised), and 8.30, "Health Physics Surveys in Uranium Recovery Facilities" (as revised), or NRC-approved equivalent.

The licensee shall follow the guidance set forth in Regulatory Guide 8.31, "Information Relevant to Ensuring That Occupational Radiation Exposures at Uranium Recovery Facilities Will Be as Low as Is Reasonably Achievable" (as revised), or NRC approved equivalent, with the following exception:

The licensee may identify one or more qualified designees to perform daily inspections in the occasional absence of the radiation safety officer (RSO) and health physics technicians (HPTs). A qualified designee will meet the minimum qualifications and perform only those duties as outlined for a qualified Designated Operator as specified in the licensee's submittals dated March 4, 2014 (ML14064A143) and May 15, 2014 (ML14135A414).

A qualified designee may perform daily inspections on weekends, holidays, and times when both the RSO and HPTs must both be absent (e.g., illness or offsite training). With the exceptions of those instances when a Federal holiday falls on a Friday or Monday, the Thanksgiving holiday, or a site closure due to weather or other safety or security related event, qualified designees will not conduct the daily inspections for more than a total of two days per week. When a Federal holiday falls on a Friday or Monday,

qualified designees
may perform the daily inspections for a total of three consecutive days. For
the
Thanksgiving holiday only, qualified designees may perform the daily
inspections for a total
of four consecutive days. When weather or other safety or security related
event causes a
site closure, a qualified designee, if available, will continue performing the
daily inspections
until the RSO or HPT can access the site after such an event. The licensee
will also have
the RSO or HPT available by telephone while a qualified designee is
performing the daily
inspections.

Reports generated by a qualified designee will be reviewed by the RSO or
an HPT as soon
as practicable, but not later than the close of business of the next work day
following an
absence (including site closure due to weather or other safety or security
related event),
weekend, or holiday. The RSO or HPT review shall be annotated with date
and time on the
report or other document that can be inspected upon request.

These are the references our Senior HP sent to me on the LCI program:

LCI, 2012a. "Letter to NRC Regarding Lost Creek Project, NRC License SUA-1598,
Docket
No. 40-9068 Request for Additional Information-Requested Clarifications and Technical
Report Page Changes-Lost Creek ISR; (December 22, 2011)," Casper, WY, February 17,
2012, ADAMS Accession No. ML12053A326

[Linton's note, specifically see page 5-13, rev 2/17/12](#)

[5.3.1 Radiation Safety Inspections](#)

[5.3.1.1 Daily Inspections](#)

[This commitment is also very specific about when designee's can be used.](#)

LCI, 2012b. "Email to NRC Regarding Radiation Safety Designee," Casper, WY,
November
8, 2012, ADAMS Accession No. ML13029A734

From: Mike Thomas [mailto:mthomas@uranerz.com]
Sent: Monday, December 01, 2014 5:12 PM
To: Linton, Ron
Subject: HP Designee

Hi Ron,

Checking in to see if you had any updates on the HP Designee review.

Hope you had a great Thanksgiving.

Mike

Mike Thomas

Vice President Regulatory and Public Affairs

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