



March 31, 2015

U.S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, DC 20555-0001

Re: Strata Energy Ross In Situ Recovery Project
Source Materials License SUA-1601, Docket No. 040-09091
License Condition 12.4

To Whom It May Concern:

License Condition 12.4 of SUA-1601 requires that Strata Energy Inc. (Strata) submit the qualifications of the radiation safety staff and states:

LC. 12.4 Prior to commencement of operations, the licensee shall submit the qualifications of radiation safety staff members, including the qualifications and responsibilities of a designee, and the policy on the work situations for a declared pregnant worker, for NRC review and verification.

The attached response addresses this License Conditions. Strata requests that NRC staff review and verify that the provided information meets the requirements contained in License Condition 12.4. Please contact me if you have any questions. You can reach me at (307) 686-4066 or mgriffin@stratawyo.com.

Sincerely,

Strata Energy, Inc.

A handwritten signature in black ink, appearing to read "M. Griffin", is written over the typed name and title of Michael Griffin.

Michael Griffin
Vice President of Permitting, Regulatory and Environmental Compliance

Cc: Mr. John Saxton, NRC Project Manager – via email

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Radiation Safety Staff Qualifications

The Ross Uranium Project radiation safety staff will meet the qualifications as recommended in NRC Regulatory Guide 8.31 "Information Relevant To Ensuring That Occupational Radiation Exposure At Uranium Recovery Facilities Will Be As Low As Reasonably Achievable" and as committed to in Section 5.3 of the Technical Report, "Qualifications for Persons Conducting the Radiation Safety Program". Accordingly, the Radiation Safety Officer (RSO) and Radiation Safety Technician (RST) will have the minimum qualifications:

Radiation Safety Officer (RSO)

- **Education:** A bachelor's degree in the physical sciences, industrial hygiene, or engineering from an accredited college or university or an equivalent combination of training and relevant experience in a uranium recovery facility radiation protection. Two years of relevant experience are generally considered equivalent to one year of academic study.
- **Health Physics Experience:** At least one year of work experience relevant to uranium recovery operations in applied health physics, radiation protection, industrial hygiene or similar work. This experience should involve actually working with radiation detection and measurement equipment, not strictly administrative or "desk" work.
- **Specialized Training:** At least 4 weeks of specialized classroom training in health physics specifically applicable to uranium recovery. In addition, the RSO should attend refresher training on uranium recovery facility health physics every two years.
- **Specialized Knowledge:** A thorough knowledge of the proper application and use of all health physics equipment used in the uranium recovery facility, the chemical and analytical procedures used for radiological sampling and monitoring, methodologies used to calculate personnel exposure to uranium and its daughters, and a thorough understanding of the uranium recovery process and equipment used in the facility and how the hazards are generated and controlled during the uranium recovery process.

Radiation Safety Technician (RST)

The RST will demonstrate a working knowledge of the proper operation of the health physics instruments used at the uranium recovery facility, surveying and sampling techniques, and personnel dosimetry requirements. The RST will have at least one of the following combinations of education, training, and experience.

Option 1:

- **Education:** An associate degree or two or more years of study in the physical sciences, engineering, or a health-related field.
- **Training:** At least a total of four weeks of generalized training (up to two weeks may be on-the-job training) in radiation health protection applicable to uranium recovery facilities.
- **Experience:** One year of work experience using sampling and analytical laboratory procedures that involve health physics, industrial hygiene, or industrial safety measures to be applied in a uranium recovery facility.

Option 2:

- **Education:** A high school diploma.
- **Training:** A total of at least three months of specialized training (up to one month may be on-the-job training) in radiation health protection related to uranium recovery facilities.
- **Experience:** Two years of relevant work experience in applied radiation protection.

Qualified Designated Operators (Designee):

The Designee is used at off-shift times (principally weekend and holidays) to complete the Daily Radiation Safety Inspection of the CPP in the absence of both the RSO and the RST. The Designee will not perform more involved procedures such as contamination surveys for the release of items for unrestricted release, survey instrument calibrations, air sampling, issuing RWP's, etc. In the case that the Designee requires assistance, the RSO or RST will be available by phone. The Designee will have the following qualifications and training:

- **Education:** A high school diploma or equivalent or relevant experience working in a uranium recovery facility. The RSO will review and approve on a case by case basis.
- Completed new employee radiation protection training and annual refresher training as required.
- At least 3 months of employment at a uranium recovery facility in the capacity of a Central Plant or IX Satellite operator, or supervisor, familiar with operations of the facility and knowledgeable of health physics, industrial safety and industrial hygiene practices used to maintain radiological levels ALARA.
- Onsite training for the Qualified Designated Operator will be conducted by the RSO and will consist of at least five (5) inspections where the trainee accompanies the RSO on daily inspections and three (3) hours of classroom type and instruction. Items covered will include, but not be limited to, the following:
 - Review of the Daily Inspection Form and how to complete it.
 - Instrument checks at the personal contamination survey stations and the radon continuous air monitor (CAM), as applicable.

- Significant spills or leaks of chemicals or process fluids that require clean up.
 - General housekeeping.
 - Proper use and storage of PPE (including respirators).
 - Ventilation, heating and lighting adequacy.
 - Security concerns such as locked doors, main gate operations and the operability of video surveillance systems (if applicable).
 - Communication systems working properly (phones, 2-way radio).
 - Any unanticipated conditions or hazards that cause concern with radiation or environmental protection
- As part of the training, as a Qualified Designated Operator, the trainee will successfully complete a written test that demonstrates the trainee's proficiency with any equipment and understanding and all requirements of the inspections and use of the form. Proficiency will be acceptable with a test core of 80% or greater.
 - Prior to final approval by the RSO, the trainee will complete three (3) daily inspections without being accompanied by the RSO or RST (when the RSO or RST are at the facility) and the RSO will assess the results of each inspection to verify the adequacy of the inspection.
 - Upon successful completion of the test and unaccompanied inspections, the RSO may authorize the trainee as a Qualified Designated Operator. All documentation will be retained on file.
 - The RSO and RST will continually assess the adequacy of daily inspections completed by all Qualified Designated Operators. On a recurring basis the RSO or RST will accompany Qualified Designated Operators on at least two (2) daily inspections per year.

All inspections completed by the Designee will be reviewed by the RSO or RST within 24 hours of the RSO or RST returning to work. The RSO or RST will signify in writing by signing (initialing) and dating the inspection reports completed by Designees. All training and testing will be documented in writing.

Policy for Declared Pregnant Worker

All female workers and their supervisors hired at the Ross Uranium Project will be instructed in NRC Regulatory Guide 8.13 "Instruction Concerning Prenatal Radiation Exposure" and NRC Regulatory Guide 8.29, "Instruction Concerning Risks from Occupational Radiation Exposure". In accordance with the recommendations in NRC Regulatory Guide 8.13 the regulatory guide will be provided to these employees in hard copy and they will be instructed on its contents including the opportunity to ask questions and request additional information. The instruction will also include the following company policies regarding "declared pregnant workers":

- All female workers hired at the Ross Uranium Project will be provided with NRC Regulatory Guide 8.13 and they will be required to sign an acknowledgement that they received the regulatory guide and the applicable instruction and they understand the instruction.

- The RSO is the company contact for all related information. The RSO will maintain all dose records.
- Workers will be informed that in order for a pregnant worker to take advantage of the lower exposure limit and dose monitoring provisions specified in 10 CFR Part 20, the woman must declare her pregnancy in writing to Strata. A form for this purpose is included in Regulatory Guide 8.13. A written and signed "Declaration of Pregnancy" will be kept on file by the Human Resources Department.
- It is Strata's policy that in the case that a "Declaration of Pregnancy" is provided the worker will be reassigned as necessary to limit exposure to ionizing radiation to levels that are as low as reasonably achievable. Strata will conduct the proper monitoring in accordance with NRC Regulatory Guide 8.13 to minimize the amount of radiation exposure and ensure that the individual does not receive more than 0.5 rem in a year.