



April 1, 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
Preoperational License Condition 12.11(E)

To Whom It May Concern:

Preoperational License Condition 12.11(E) of SUA-1601 requires the following:

12.11 Prior to the preoperational inspection, the licensee will provide to the NRC written SOPs required for LC 10.4, which will include information to meet the following specific-site conditions:

E) Transportation of licensed material outside of the License area.

The attached response addresses this preoperational License Condition.

Strata requests that NRC staff verify that the provided information meets the requirements contained in License Condition 12.11(E). 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 printed name and title.

Michael Griffin
Vice President of Permitting, Regulatory and Environmental Compliance

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

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The following is an excerpt of the Strata Radiation Protection Program (RPP) that provides procedures to control equipment and materials that are potentially contaminated with licensed materials and not maintained within a restricted area. The procedure also addresses the requirements for these materials from 10 CFR §71.5 and US Department of Transportation requirements contained in 49 CFR §§ 172, 173, and 177.

8.7. Contamination Control Program for Potentially Contaminated Equipment Maintained On-Site

This procedure describes how equipment, tools and materials (equipment) that are potentially contaminated with low levels of radioactivity from natural uranium and its daughter products are handled at the Ross facilities to minimize the spread of contamination to uncontrolled areas. The purpose of the procedure is to ensure that the handling and movement of potentially contaminated equipment between different wellfield areas (Mine Units), and wellfield areas and the CPP, does not result in the uncontrolled release of licensed material (contamination) to non-operational (unrestricted) areas within the license area. This procedure assists in controlling contamination outside restricted areas, prevents releases to the environment and maintains potential exposures to radioactive materials As Low as Reasonably Achievable (ALARA).

8.7.1 Characterization of Potentially Contaminated Equipment

Equipment used at the wellfield areas which is subject to uranium solutions (injection or production fluids, also known as "lixiviant") and may contain low levels of surface contamination from uranium and its daughter products includes downhole pumps, tubing and wire, valves and gauges on wellheads and pipes, valves, gauges, meters, tools and similar appurtenances in the Module Buildings. Historic analysis conducted on wellfield lixiviant shows that natural uranium constitutes approximately 97% of the radioactivity within production fluid. Therefore, the natural uranium within these fluids is the primary source of contamination that can potentially leave a residue on equipment. Strata will confirm that the lixiviant at the Ross project approximates this uranium concentration.

DOT regulations specify that the limits for "excepted packages" cannot exceed more than 15g of U-235. Since natural uranium contains 0.7% U-235, over 2134 grams (4.7 lbs.) of natural uranium would be required to exceed the 15g limit. It is very unlikely that the contamination on equipment of concern at the wellfields or Module Buildings would approach this limit. Therefore, the equipment of concern is considered "excepted packages" when it is transported in a designated vehicle. This designation, combined with the very low levels of potential contamination and the following "Conditional Release" procedure will ensure that potentially contaminated equipment will be transported within the license area in a manner that will meet ALARA principles.

8.7.2 Conditional Release of Potentially Contaminated Equipment

All personnel that handle potentially contaminated equipment at the wellfield areas will be trained in this Conditional Release procedure. Potentially contaminated equipment of concern will be transported in designated company vehicles (typically pickups) that do not leave the licensed area without the required survey for the release of equipment and materials for unrestricted release (see Section 8.6). The Conditional Release procedure is as follows:

- If there is visible contamination on any equipment the contamination will be removed or it will be contained in a plastic bag or bucket, designated tool box, wrapped in plastic to prevent surface contamination from falling off the equipment or other suitable measures will be applied to minimize the spread of surface contamination from the equipment.
- The equipment will only be transported in company trucks designated for this purpose.
- The truck bed will be considered the excepted package and the equipment will only be transported to a controlled or Restricted Area.
- The equipment will be directly transported to the location by a trained company employee. Therefore, it will remain in the control of Strata as the NRC licensee at all times during transport.

8.7.3 Additional Controls to Minimize the Potential Spread of Contamination

The following additional controls are utilized to minimize the spread of contamination areas outside Restricted Areas:

- Any equipment released for unrestricted use will be surveyed by the RSO or RST in accordance with Section 8.6.
- Personnel that handle potentially contaminated equipment will be trained and they will utilize the appropriate PPE, including the use of gloves.
- Hand tools will be kept in dedicated tool boxes in wellfield vehicles used for Conditional Release. If tools show an accumulation of surface contamination they will be washed at the Restricted Area.
- All trucks used for Conditional Release of equipment will be equipped with a radio for quick notification of the RSO and management in the case of an accident.
- The RSO or RST will conduct spot surveys of trucks (truck bed and tool boxes) used for Conditional Release on at least a quarterly basis. If the survey shows levels of alpha contamination approaching 22,000 dpm per 100 cm² or a gamma exposure of 0.5 mR/hr

the truck will be washed at the Restricted Area and resurveyed to ensure levels of contamination are maintained ALARA.

- *The Contamination Control Program will be included in new hire radiation protection training as well as annual refresher training as discussed in the Strata Training Program. Proficiency of training will be demonstrated through a written exam and task observations administered by the RSO.*
- *The procedure will be reviewed on an annual basis by the RSO to determine if it adequately achieves its intended purpose.*