

June 3, 2015

Mr. Jonathan Downing  
Executive Director  
Wyoming Mining Association  
P.O. Box 866  
Cheyenne, WY 82003

SUBJECT: RESPONSE TO FEBRUARY 9, 2015, WYOMING MINING ASSOCIATION  
LETTER

Dear Mr. Downing:

I am writing in response to your letter to the U.S. Nuclear Regulatory Commission (NRC, or the Commission) dated February 9, 2015 (found in the Agencywide Documents Access and Management System (ADAMS) under Accession No. ML15125A076). In your letter, you stated that you reviewed and concurred with concerns expressed by the National Mining Association (NMA) in its letter dated January 23, 2015 (ADAMS Accession No. ML15034A263). The NMA expressed concerns about health physics issues related to effluent monitoring and public dose calculations specific to radon-222 (radon) and its decay products (radon progeny). In your letter, you stated that Wyoming Mining Association (WMA) wished to add certain issues to the discussion.

Specifically, in your February 9, 2015, letter, you expressed concerns about three topics also raised by NMA in its January 23, 2015, letter. These three topics pertain to: (1) whether NRC staff should review and approve facility standard operating procedures as part of a licensing decision; (2) the technical difficulties inherent in estimating gaseous effluent quantities from a facility by using downwind air sample stations; and (3) the minimal risk posed by uranium recovery facilities. WMA also reiterated NMA's request that uranium recovery facilities be allowed to continue estimating dose to the public using previously accepted methods (e.g., MILDOS (with operational inputs) and measurements, in certain cases if, due to site specific circumstances, such an approach is simpler) as allowed by the regulations, current guidance and approved practice.

NRC staff has evaluated your concerns and find that they are substantially similar to statements provided by the NMA in its January 23, 2015, letter. Therefore, I refer you to my previous response to NMA's concerns, which is available in ADAMS at Accession No. ML15118A852.

The NRC appreciates WMA's interest in our regulatory process and welcomes its ideas regarding efficiency in our licensing process. If NMA has any questions, please contact David Brown, Sr. Health Physicist, Uranium Recovery Licensing Branch. Mr. Brown can be reached at (301) 415-7677 or [david.brown@nrc.gov](mailto:david.brown@nrc.gov).

J. Downing

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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 the NRC's ADAMS. ADAMS is accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html>.

Sincerely,

**/RA/**

Larry W. Camper, Director  
Division of Decommissioning, Uranium Recovery  
and Waste Programs  
Office of Nuclear Material Safety  
and Safeguards

J. Downing

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Sincerely,

**/RA/**

Larry W. Camper, Director  
Division of Decommissioning, Uranium Recovery  
and Waste Programs  
Office of Nuclear Material Safety  
and Safeguards

**ML15118A889**

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