

From: [Larry Teahon](#)
To: [Burrows, Ronald](#)
Cc: [Sabrina Fox](#); [Tami Dyer](#); [Kari Toews](#)
Subject: [External_Sender] Response to LC 11.11
Date: Friday, December 04, 2015 11:27:29 AM
Attachments: [Radon Daugher Measurements in the Wellfield Area.xlsx](#)

Ron:

On September 21, 2015, Crow Butte submitted to the NRC responses to requests for addition clarifications concerning License Condition 11.11. In the response to RAI #8 (page 30), Crow Butte indicated the following: "All wellfield operations personnel participate in the monitoring program, which includes monitoring for internal and external exposure. The external exposure is monitored with OSL badges provided by Landauer and exchanged on a quarterly frequency. The badges are worn for an employee's entire shift. Since it is difficult to sample all areas of the wellfield accurately, the internal exposures for the wellfield operations personnel are based on the same plant concentrations at a 100% occupancy factor. Wellfield concentrations of both radon daughters and airborne uranium will be much lower than plant concentrations so this is a very conservative way to assign internal intake". Attached is the data collected in the wellfield that was used in making this assessment.

Regards,

Larry Teahon

SHEQ Manager
Cameco Resources
Crow Butte Operation
86 Crow Butte Road
Crawford, NE 69339

Office: (308) 665-2215 ext. 114
Fax: (308) 665-2341
Larry_Teahon@cameco.com

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Kuznetz Samples

| | WL | WL | WL | WL | WL | WL | WL | WL | WL |
|-------------------------|--------------|--------------|--------------|--------------|--------------|--------------|--------------|--------------|---------------|
| Location/ Date Range | 10-May-13 | 12-Jul-13 | 16-Aug-13 | 30-Sep-13 | 18-Oct-13 | 8-Nov-13 | 20-Dec-13 | 24-Jan-14 | Average |
| AM-1 | 0.002 | 0.001 | 0.001 | 0.001 | 0.000 | 0.000 | 0.003 | 0.000 | 0.0010 |
| AM-2 | 0.002 | 0.002 | 0.001 | 0.001 | 0.000 | 0.001 | 0.001 | 0.001 | 0.0011 |
| AM-3 | 0.001 | 0.001 | 0.001 | 0.001 | 0.001 | 0.001 | 0.004 | 0.001 | 0.0014 |
| AM-4 | 0.002 | 0.001 | 0.001 | 0.001 | 0.002 | 0.002 | 0.001 | 0.000 | 0.0013 |
| AM-5 | 0.001 | 0.002 | 0.000 | 0.001 | 0.001 | 0.001 | 0.000 | 0.001 | 0.0009 |
| AM-6 | 0.000 | 0.002 | 0.000 | 0.001 | 0.001 | 0.001 | 0.001 | 0.001 | 0.0009 |
| AM-8 | 0.002 | 0.002 | 0.000 | 0.001 | 0.001 | 0.000 | 0.004 | 0.000 | 0.0013 |
| AM-22 | 0.000 | 0.001 | 0.000 | 0.001 | 0.000 | 0.001 | 0.001 | 0.000 | 0.0005 |
| AM-23 | 0.001 | 0.002 | 0.001 | 0.001 | 0.000 | 0.001 | 0.001 | 0.001 | 0.0010 |
| AM-24 | 0.000 | 0.002 | 0.001 | 0.014 | 0.001 | 0.000 | 0.001 | 0.001 | 0.0025 |
| AM-25 | 0.007 | 0.004 | 0.000 | 0.001 | 0.000 | 0.000 | 0.001 | 0.000 | 0.0016 |
| WH-9 | 0.000 | 0.003 | 0.000 | 0.001 | 0.000 | 0.000 | 0.001 | 0.001 | 0.0008 |
| WH-17 | 0.001 | 0.001 | 0.000 | 0.001 | 0.001 | 0.001 | 0.001 | 0.001 | 0.0009 |
| WH-47 | 0.001 | 0.001 | 0.001 | 0.000 | 0.001 | 0.000 | 0.002 | 0.001 | 0.0009 |
| WH-50 | 0.001 | 0.001 | 0.000 | 0.001 | 0.001 | 0.001 | 0.001 | 0.001 | 0.0009 |
| TE-1 | 0.001 | 0.001 | 0.001 | 0.000 | 0.001 | 0.000 | 0.001 | 0.001 | 0.0008 |
| TE-2 | 0.003 | 0.002 | 0.000 | 0.001 | 0.001 | 0.000 | 0.004 | 0.004 | 0.0019 |
| TE-3 | 0.003 | 0.004 | 0.000 | 0.001 | 0.002 | 0.002 | 0.003 | 0.002 | 0.0021 |
| TE-4 | 0.002 | 0.004 | 0.000 | 0.001 | 0.002 | 0.001 | 0.001 | 0.001 | 0.0015 |

Bkg Station

Bkg Subtracted Kuznetz Samples

| Location/ Date Range | 10-May-13 | 12-Jul-13 | 16-Aug-13 | 30-Sep-13 | 18-Oct-13 | 8-Nov-13 | 20-Dec-13 | 24-Jan-14 | Average |
|-------------------------|-----------|-----------|-----------|-----------|-----------|----------|-----------|-----------|---------|
| AM-1 | 0.002 | 0 | 0.001 | 0 | 0 | 0 | 0.002 | 0 | 0.0006 |
| AM-2 | 0.002 | 0 | 0.001 | 0 | 0 | 0 | 0 | 0 | 0.0004 |
| AM-3 | 0.001 | 0 | 0.001 | 0 | 0 | 0 | 0.003 | 0 | 0.0006 |
| AM-4 | 0.002 | 0 | 0.001 | 0 | 0.001 | 0.001 | 0 | 0 | 0.0006 |
| AM-5 | 0.001 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0.0001 |
| | | | | | | | | | |
| AM-8 | 0.002 | 0 | 0 | 0 | 0 | 0 | 0.003 | 0 | 0.0006 |
| AM-22 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0.0000 |
| AM-23 | 0.001 | 0 | 0.001 | 0 | 0 | 0 | 0 | 0 | 0.0003 |
| AM-24 | 0 | 0 | 0.001 | 0.013 | 0 | 0 | 0 | 0 | 0.0018 |
| AM-25 | 0.007 | 0.002 | 0 | 0 | 0 | 0 | 0 | 0 | 0.0011 |
| WH-9 | 0 | 0.001 | 0 | 0 | 0 | 0 | 0 | 0 | 0.0001 |
| WH-17 | 0.001 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0.0001 |
| WH-47 | 0.001 | 0 | 0.001 | 0 | 0 | 0 | 0.001 | 0 | 0.0004 |
| WH-50 | 0.001 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0.0001 |
| TE-1 | 0.001 | 0 | 0.001 | 0 | 0 | 0 | 0 | 0 | 0.0003 |
| TE-2 | 0.003 | 0 | 0 | 0 | 0 | 0 | 0.003 | 0.003 | 0.0011 |
| TE-3 | 0.003 | 0.002 | 0 | 0 | 0.001 | 0.001 | 0.002 | 0.001 | 0.0013 |
| TE-4 | 0.002 | 0.002 | 0 | 0 | 0.001 | 0 | 0 | 0 | 0.0006 |

Average 0.0006 (excludes bkg station result)