



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

August 8, 2016

Mr. Larry Teahon, Manager
SHEQ
Cameco Resources
Crow Butte Operation
86 Crow Butte Road
P.O. Box 169
Crawford, NE 69339-0169

SUBJECT: COMMENT ON RESULTS OF SAFETY AND ENVIRONMENTAL REVIEW
PANEL EVALUATION 16-03, CROW BUTTE RESOURCES, INC., CRAWFORD,
NEBRASKA, SOURCE MATERIALS LICENSE SUA-1534

Dear Mr. Teahon:

By letter dated July 1, 2016 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML16196A052), Cameco Resources, Crow Butte Operation (CBO) submitted to the U.S. Nuclear Regulatory Commission (NRC) staff, changes to the Cameco Divisional organizational structure. These changes were the result of the NRC staff's comments (ADAMS Accession No. ML16173A193) on Revision #5 (Rev. 5) of CBO's Quality Assurance Program (QAP) (ADAMS Accession No. ML16166A126) to satisfy License Condition (LC) 9.12 (ML13324A101) and were performed by CBO in accordance with LC 9.4 (ADAMS Accession No. ML13324A101) through a Safety and Environmental Review Panel (SERP). SERP Evaluation 16-03 documented the SERP's findings. The NRC staff has the following comment on SERP Evaluation 16-03 that requires CBO's response before the NRC staff can complete its review on Rev. 5 of the QAP (ADAMS Accession No. ML16166A126) and an additional comment on Rev. 5 of the QAP.

Section 5 of CBO's revised application (SERP Evaluation 16-03) (ADAMS Accession No. ML16196A052) describes the specific responsibilities of its corporate organization as it relates to the Crow Butte Project. Section 2 of CBO's Rev. 5 of the QAP (ADAMS Accession No. ML16166A126) refers to Section 5 of its application for a description of the responsibilities of the Quality Assurance (QA) personnel. The NRC staff observes that Section 5 of CBO's revised application does not appear to include a description of the position Qualified Designated Operator. The position of Qualified Designated Operator is included in Sections 3.10 and 13.4 of Rev. 5 of the QAP. In addition, the position of Qualified Designated Operator was previously included in Section 2 of Rev. 2 of the QAP (ADAMS Accession No. ML15314A788). Please either include the Qualified Designated Operator in CBO's QA organizational structure or provide justification for deleting this position.

In addition to updating the QA positions, CBO's Rev. 5 of the QAP (ADAMS Accession No. ML16166A126) revised the description of the weekly inspections in Section 13.4.2. The NRC staff observes that this revised description is not consistent with the requirements of LC 9.7.

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LC 9.7 requires CBO to follow the guidance set forth in Regulatory Guide 8.31, with the exception of the daily inspections as provided in LC 9.7. CBO's current license does not allow for the performance of weekly inspections using a Qualified Designated Operator or Health Physics Technician as indicated in Rev. 5 of CBO's QAP.

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 NRC's Agencywide Documents Access and Management System (ADAMS). ADAMS is accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html>.

If you have any questions, please contact me at 301-415-6443, or by e-mail at Ronald.Burrows@nrc.gov.

Sincerely,

/RA/

Ronald A. Burrows, Project Manager
Uranium Recovery Licensing Branch
Division of Decommissioning, Uranium Recovery,
and Waste Programs
Office of Nuclear Material Safety
and Safeguards

Docket No.: 040-8943
License No.: SUA-1534

cc: D. Miesbach, NDEQ
D. Pavlick, CBR

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Docket No.: 040-8943
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D. Pavlick, CBR

ADAMS Accession No.: ML16203A082

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DATE	7/21/16	7/21/16	8/4/16	8/8/16

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