

**From:** [Bill Kearney](#)  
**To:** [Saxton, John](#)  
**Cc:** [Mike Griffin](#)  
**Subject:** [External\_Sender] RE: Proposed license conditions for the change of address and designee  
**Date:** Monday, February 13, 2017 1:26:34 PM

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John:

Strata requests that NRC revise LC 9.7 such that the requirement to have the RSO or RST review designee inspections “no later than 3 hours from the beginning of the next work day” be revised (as below) to reflect that RSO or RST reviews will be “reviewed by the RSO or RST as soon as practical, but no later than the close of business on the first day an RSO or RST returns to work”.

This minor change will not significantly impact the intent of the license condition and it is our understanding that this language is consistent with other ISR licenses.

Regards

Bill Kearney

- 9.7 The licensee shall follow the guidance set forth in NRC Regulatory Guides 8.22, “Bioassay at Uranium Recovery Facilities” (as revised), 8.30, “Health Physics Surveys in Uranium Recovery Facilities” (as revised) and 8.31, “Information Relevant to Ensuring that Occupational Radiation Exposure at Uranium Recovery Facilities will be As Low As Is Reasonably Achievable (ALARA),” (as revised) or NRC-approved equivalent with the following exception:

The licensee may identify qualified designee(s) to perform daily inspections in the occasional absence of the RSO and radiation safety technician(s) (RST). The qualified designee(s) will have health physics training, and the licensee will specify the training program to qualify a designee and submit it to the NRC staff for review and written verification. A qualified designee may perform daily inspections on weekends, holidays, or times when both the RSO and RST(s) must both be absent (e.g., illness or offsite training). A qualified designee shall perform daily inspections for no more than 2 consecutive days per week, except (a) up to 3 consecutive days, when a Federal holiday falls on a Monday or Friday, or (b), up to 4 consecutive days for Thanksgiving and when the Christmas holiday consists of two days abutting a weekend. Reports generated by the designee will be reviewed by the RSO or RST as soon as practical, but no later than **the close of business on the first day an RSO or RST returns to work. The RSO or RST review shall be annotated with date and time on the report or other document that can be inspected upon request.** The licensee will also have the RSO or RST available by telephone while the qualified designee is performing the daily inspections.

Notwithstanding the License Condition (LC) 9.4 change process, no additional exceptions

to the guidance will be implemented without written NRC verification that the criteria in LC 9.4 do not require a license amendment.

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**From:** Saxton, John [mailto:John.Saxton@nrc.gov]  
**Sent:** Monday, February 06, 2017 11:53 AM  
**To:** Bill Kearney  
**Cc:** Mike Griffin  
**Subject:** Proposed license conditions for the change of address and designee

Bill,

Below, please find two license conditions for (a) the change of address and (b) designee daily surveying up to 4 days.

If these license conditions are acceptable to Strata, please respond back to me.

Thanks.

John

2. 2929 New Haven Road  
Oshoto, WY 82721

[Applicable Amendment: 6]

- 9.7 The licensee shall follow the guidance set forth in NRC Regulatory Guides 8.22, "Bioassay at Uranium Recovery Facilities" (as revised), 8.30, "Health Physics Surveys in Uranium Recovery Facilities" (as revised) and 8.31, "Information Relevant to Ensuring that Occupational Radiation Exposure at Uranium Recovery Facilities will be As Low As Is Reasonably Achievable (ALARA)," (as revised) or NRC-approved equivalent with the following exception:

The licensee may identify qualified designee(s) to perform daily inspections in the occasional absence of the RSO and radiation safety technician(s) (RST). The qualified designee(s) will have health physics training, and the licensee will specify the training program to qualify a designee and submit it to the NRC staff for review and written verification. A qualified designee may perform daily inspections on weekends, holidays, or times when both the RSO and RST(s) must both be absent (e.g., illness or offsite training). A qualified designee shall perform daily inspections for no more than 2 consecutive days per week, except (a) up to 3 consecutive days, when a Federal holiday falls on a Monday or Friday, or (b), up to 4 consecutive days for Thanksgiving and when the Christmas holiday consists of two days abutting a weekend. Reports generated by the designee will be reviewed by the RSO or RST as soon as practical, but no later than 3 hours from the beginning of the next work day following an absence, weekend, or

holiday. The licensee will also have the RSO or RST available by telephone while the qualified designee is performing the daily inspections.

Notwithstanding the License Condition (LC) 9.4 change process, no additional exceptions to the guidance will be implemented without written NRC verification that the criteria in LC 9.4 do not require a license amendment.

[Applicable Amendment: 6]

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