



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

March 15, 2017

John W. Cash  
Vice President of Regulatory Affairs  
Ur-Energy Inc.  
5880 Enterprise Dr., Suite 200  
Casper, WY 82609

SUBJECT: U.S. NUCLEAR REGULATORY COMMISSION STAFF REVIEW OF THE QUALIFICATIONS FOR THE RADIATION SAFETY OFFICER FOR SHIRLEY BASIN NORTH URANIUM MILL SITE (Docket Number 040-6622)

Dear Mr. Cash:

I am writing in response to your email of February 23, 2017, informing the U.S. Nuclear Regulatory Commission (NRC) staff that the Radiation Safety Officer (RSO) for the Shirley Basin North uranium mill site had resigned and was being replaced (Agencywide Document Access and Management System (ADAMS) Accession Number ML17067A265). In your email you provided the resume of the new RSO and indicated that, since your radioactive materials license did not list an RSO, you believed that informing the NRC staff of the change was adequate. You also requested that you be informed if the NRC staff concluded that any additional actions were required on your part. I discussed the NRC staff's review of your email with you on March 6, 2017, and informed you that I would provide you with a written response as soon as our review was completed.

Typically, the NRC staff does not approve specific individuals for RSO positions. Rather, the qualifications for an RSO are incorporated into the radioactive materials license, either by a license condition that specifies the RSO qualifications, or by approving the license application that states the RSO qualifications. Approval of the license application, and all commitments provided therein, serves as the approval of the RSO qualifications. The NRC reviews the licensee's records during inspections to determine if the licensee is in compliance with the commitments provided in the license application. Currently, License Condition 11 of your radioactive materials license commits Ur-Energy, Inc. to comply with the commitments provided in your November 30, 1994, license application (Accession Number 9412280330), as modified the submittal dated December 26, 2002. We will review your records during a future inspection to confirm that the new RSO meets the qualifications provided in your license application.

In your email you stated that the individual met the requirements of Regulatory Guide 8.31. However, a review of Section 5.2 of your November 30, 1994, radioactive materials license application does not require that the RSO meet the requirements of Regulatory Guide 8.31. The requirements for an RSO outlined in your license application are:

Bachelor's degree in engineering or physical or biological sciences. Two years of radiation safety work experience may be substituted for each year of the educational requirement;

One year of supervisory experience and one year of experience in a radiation-related industry; and

Formalized training in Radiation Safety

The NRC staff's review of the resume provided in your email indicates that the new RSO appears to have the qualifications discussed in your license application, with the exception of one year of supervisory experience. We suggest that, if the new RSO has this experience, you document this experience and maintain the documentation for review during our inspection of your activities.

In summary, we are neither approving nor disapproving the RSO for your Shirley Basin North uranium mill site. Compliance with the conditions of your radioactive materials license will be determined during a future inspection of your activities. Rather, we are acknowledging that the RSO for the site has changed and informing you that you will need to ensure, and document, that the new RSO is qualified in accordance with commitments made in your radioactive materials license application, as modified by any subsequent conditions or commitments.

In accordance with Title 10 of the *Code of Federal Regulations* (10 CFR) Section 2.390, 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 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: 301-415-6749 or via e-mail at: [Dominick.Orlando@nrc.gov](mailto:Dominick.Orlando@nrc.gov).

Sincerely,

**/RA/**

Dominick A. Orlando, Senior Project Manager  
Materials Decommissioning Branch  
Division of Decommissioning, Uranium Recovery  
and Waste Programs  
Office of Nuclear Material Safety  
and Safeguards

Docket No. 040-06622

SUBJECT: U.S. NUCLEAR REGULATORY COMMISSION STAFF REVIEW OF THE QUALIFICATIONS FOR THE RADIATION SAFETY OFFICER FOR SHIRLEY BASIN NORTH URANIUM MILL SITE (Docket Number 040-6622)

**ADAMS Accession No.: ML17066A445**

<b>OFFICE</b>	NMSS	NMSS	NMSS	NMSS
<b>NAME</b>	D. Orlando	CHolston	T. Smith	D.Orlando
<b>DATE</b>	3/ 8 /2017	3/ 9 /2017	3/ 13 /2017	3/ 15 /2017

**OFFICIAL RECORD COPY**