Crow Butte Resources, Inc.
Proposed Changes to License Conditions

10.16

Each of the research and development (R&D) evaporation ponds shall have at least 0.9 meters (3 feet) of freeboard. Each of the commercial solar evaporation ponds shall have at least 1.5 meters (5 feet) of freeboard. ~~Additionally, t~~The licensee shall maintain, at all times, sufficient reserve capacity in the evaporation pond system to enable transferring the contents of a pond to the other ponds.

Liner Repair

In the event of a leak and subsequent transfer of liquid, freeboard requirements shall be suspended during the repair period.

Liner Replacement

In the event of a liner replacement, sufficient reserve capacity in the evaporation pond system to enable transferring the contents of a pond to the other ponds shall be suspended until the pond is returned to operation. The freeboard requirements shall not be suspended during this period.

Liner Repair and Liner Replacement

In the event a liner replacement and a liner repair becomes necessary at the same time, sufficient reserve capacity in the evaporation pond system to enable transferring the contents of a pond to the other ponds shall be suspended until the liner replacement is complete. The freeboard requirements shall be suspended only during the liner repair period.

11.9 The licensee shall perform and document inspections in accordance with the ~~February 5, 1996~~April 11, 2017, revision to its Evaporation Pond Onsite Inspection Program.

Any time 6 inches or more of fluid is detected in a commercial pond standpipe, it shall be analyzed for specific conductance. If the water quality is degraded beyond the action level, the water shall be further sampled and analyzed for chloride, alkalinity, sodium, and sulfate. Any time 6 inches or more of fluid is detected in an R&D pond standpipe, it shall be analyzed for specific conductance, chloride, alkalinity, sodium, and sulfate.

Liner Repair

Upon verification of a liner leak, the licensee shall notify NRC in accordance with LC 11.6, lower the fluid level sufficiently to eliminate the leak by transferring the pond's contents to an alternate cell or approved destination, and undertake repairs as needed. Water quality in the affected standpipe shall be analyzed for the five parameters listed above once every 7 days during the leak period and once every 7 days for at least 14 days following repairs. In the event of a leak and subsequent transfer of liquid, freeboard requirements shall be suspended during the repair period. ~~The minimum freeboard levels will be a maintained in accordance with License Condition 10.16.~~

~~1.1~~ The licensee shall submit a corrective action plan within 30 days to NRC for review. The corrective action plan will document steps to adequately address the leak and procedures used to verify that the leak has been adequately addressed and permanently fixed. The corrective action plan should also evaluate how much and for how long the diminished waste disposal capacity will impact operations.

Liner Replacement

When it is determined a liner replacement is necessary, the licensee shall notify NRC in accordance with LC 11.6, remove the fluids by transferring the pond's contents to an alternate cell or approved destination, and undertake the liner replacement. Once the transfer of fluids has been completed, measurement of the water level in the pond and the standpipes will be suspended until the liner is replaced and the pond is returned to operation. Sufficient reserve capacity in the evaporation pond system to enable transferring the contents of a pond to the other ponds shall be suspended until the pond is returned to operation. The freeboard requirements shall not be suspended during this period.

The licensee shall submit a corrective action plan for the liner replacement within 30 days to NRC for review. The corrective action plan will document steps to adequately address the liner replacement and procedures used to verify that the liner replacement has been adequately addressed. The corrective action plan will also evaluate how much and for how long the diminished waste disposal capacity will impact operations.

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Liner Repair and Liner Replacement

In the event a liner replacement and a liner repair become necessary at the same time, sufficient reserve capacity in the evaporation pond system to enable transferring the contents of a pond to the other ponds shall be suspended until the liner replacement is complete. The freeboard requirements shall be suspended only during the liner repair period.

10.16

Each of the research and development (R&D) evaporation ponds shall have at least 0.9 meters (3 feet) of freeboard. Each of the commercial solar evaporation ponds shall have at least 1.5 meters (5 feet) of freeboard. The licensee shall maintain, at all times, sufficient reserve capacity in the evaporation pond system to enable transferring the contents of a pond to the other ponds.

Liner Repair

In the event of a leak and subsequent transfer of liquid, freeboard requirements shall be suspended during the repair period.

Liner Replacement

In the event of a liner replacement, sufficient reserve capacity in the evaporation pond system to enable transferring the contents of a pond to the other ponds shall be suspended until the pond is returned to operation. The freeboard requirements shall not be suspended during this period.

Liner Repair and Liner Replacement

In the event a liner replacement and a liner repair become necessary at the same time, sufficient reserve capacity in the evaporation pond system to enable transferring the contents of a pond to the other ponds shall be suspended until the liner replacement is complete. The freeboard requirements shall be suspended only during the liner repair period.

11.9

The licensee shall perform and document inspections in accordance with the April 11, 2017, revision to its Evaporation Pond Onsite Inspection Program.

Any time 6 inches or more of fluid is detected in a commercial pond standpipe, it shall be analyzed for specific conductance. If the water quality is degraded beyond the action level, the water shall be further sampled and analyzed for chloride, alkalinity, sodium, and sulfate. Any time 6 inches or more of fluid is detected in an R&D pond standpipe, it shall be analyzed for specific conductance, chloride, alkalinity, sodium, and sulfate.

Liner Repair

Upon verification of a liner leak, the licensee shall notify NRC in accordance with LC 11.6, lower the fluid level sufficiently to eliminate the leak by transferring the pond's contents to an alternate cell or approved destination, and undertake repairs as needed. Water quality in the affected standpipe shall be analyzed for the five parameters listed above once every 7 days during the leak period and once every 7 days for at least 14 days following repairs. In the event of a leak and subsequent transfer of liquid, freeboard requirements shall be suspended during the repair period.

The licensee shall submit a corrective action plan within 30 days to NRC for review. The corrective action plan will document steps to adequately address the leak and procedures used to verify that the leak has been adequately addressed and permanently fixed. The corrective action plan should also evaluate how much and for how long the diminished waste disposal capacity will impact operations.

Liner Replacement

When it is determined a liner replacement is necessary, the licensee shall notify NRC in accordance with LC 11.6, remove the fluids by transferring the pond's contents to an alternate cell or approved destination, and undertake the liner replacement. Once the transfer of fluids has been completed, measurement of the water level in the pond and the standpipes will be suspended until the liner is replaced and the pond is returned to operation. Sufficient reserve capacity in the evaporation pond system to enable transferring the contents of a pond to the other ponds shall be suspended until the pond is returned to operation. The freeboard requirements shall not be suspended during this period.

The licensee shall submit a corrective action plan for the liner replacement within 30 days to NRC for review. The corrective action plan will document steps to adequately address the liner replacement and procedures used to verify that the liner replacement has been adequately addressed. The corrective action plan will also evaluate how much and for how long the diminished waste disposal capacity will impact operations.

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Liner Repair and Liner Replacement

In the event a liner replacement and a liner repair become necessary at the same time, sufficient reserve capacity in the evaporation pond system to enable transferring the contents of a pond to the other ponds shall be suspended until the liner replacement is complete. The freeboard requirements shall be suspended only during the liner repair period.