



January 16, 2018

Via NRC EIE

NRC Document Control Desk
Attn: Mr. Christopher Grossman
Senior Project Manager
Decommissioning, Uranium Recovery, and Waste Programs
Office of Nuclear Materials Safety and Safeguards
U.S. Nuclear Regulatory Commission
Washington DC 20555-0001

Re: **Docket 40-9059, Renewal of License SUC-1591** – Request for 20-year License Term

Dear Mr. Grossman:

This letter satisfies one of the action items resulting from the recent NRC-Water Remediation Technology LLC (WRT) public meeting regarding the renewal of the license referenced above, held at NRC headquarters on January 10, 2018. As background, WRT is an 11-year NRC source material licensee, for uranium drinking water treatment. WRT made a timely renewal submittal on December 21, 2016, and NRC is completing the review process to approve and issue WRT's first license renewal. WRT hereby requests that NRC increase the term of this renewed license, from the 10 years of the initial license, to now 20 years.

This request for a longer license term for WRT's renewed water treatment license has support from a recent decision and directive from the Commission. In 2017, the Commission issued a Staff Requirements Memorandum (SRM), ref. SECY-17-0086, directing Staff to increase the license terms for uranium recovery facilities, for both new applications and renewals, to up to 20 years. Chairman Svinicki identified these recovery facilities as low-risk operations. WRT's licensed uranium water treatment activities are similar to, but on a much smaller scale to those of a portion of the processes at a uranium insitu recovery (ISR) facility, the intermediate processes to extract the dissolved uranium from the well field solutions. Because of, in part, the significantly smaller scale of WRT's treatment activities, the overall radiologic risk from WRT's operations are significantly less than that of an ISR facility. Additionally, after 12 years of experience with both uranium water treatment, and radium treatment in Agreement States, WRT has demonstrated, in its NRC license renewal application, that the risks are even less than what WRT estimated in its initial NRC license application in 2005. Accordingly, it is reasonable that WRT's renewed license be issued with a 20-year term, recognizing that the associated radiologic risks are at a minimum, no more than, and realistically much less than at uranium ISR facilities, that can now be given a similar license term.

WRT appreciates NRC's consideration of this request. Feel free to contact me, at 303.424.5355 ext. 108 or dbollig@wrtnet.com, if you have any questions related to this request.

Best regards,

Duane W. Bollig
Director – Environmental & Regulatory Affairs

cc: Ted Adams Chris Pugsley, Esq. file NRC 1.05

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