From:	IMPEP Resource
To:	IMPEP Resource
Subject:	RIV DNMS Revised Response Letter to IMPEP Questionnaire
Date:	Tuesday, April 16, 2019 4:36:10 PM
Attachments:	RIV DNMS 2019 IMPEP Response Letter with Attachments - dated March 27, 2019.pdf

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From: Browder, Rachel
Sent: Wednesday, March 27, 2019 1:04 PM
To: Rakovan, Lance <Lance.Rakovan@nrc.gov>; Modes, Kathy <Kathy.Modes@nrc.gov>; White, Duncan <Duncan.White@nrc.gov>
Cc: Pruett, Troy <Troy.Pruett@nrc.gov>; Howell, Linda <Linda.Howell@nrc.gov>
Subject: FYI: RIV DNMS Revised Response Letter to IMPEP Questionnaire

Mr. Rakovan,
Please see the attached RIV DNMS revised IMPEP Questionnaire response. Our response was revised based on several questions and clarifications requested by the IMPEP Team prior to the scheduled IMPEP review next week. Please disregard the IMPEP Questionnaire response provided on March 13, 2019.

If there are any questions, please do not hesitate to contact me. We look forward to having you and your team in our offices for the IMPEP review, scheduled April 1-5, 2019.
Sincerely,
Rachel

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2019
IMPEP Review

NRC
Region IV DNMS

March 27, 2019

Approved by OMB[1]
Control No. 3150-0183
Expires 01/31/2020

INTEGRATED MATERIALS PERFORMANCE EVALUATION PROGRAM QUESTIONNAIRE

NRC Region IV Materials Program
Reporting Period: May 3, 2014 – April 5, 2019

Note: If there has been no change in the response to a specific question since the last IMPEP questionnaire, the State or Region may copy the previous answer, if appropriate.

A. GENERAL

1. Please prepare a summary of the status of the State's or Region's actions taken in response to each of the open recommendations from previous IMPEP reviews.

   RESPONSE:
   Region IV did not have any open recommendations from previous IMPEP reviews. Therefore, there is no response necessary. Region IV DNMS performed several audits during the review period and those audits and the associated corrective actions will be made available to the IMPEP Team during the review, as requested.

B. COMMON PERFORMANCE INDICATORS

I. Technical Staffing and Training

2. Please provide organization charts, including names and positions for Region IV and the Division of Nuclear Materials Safety.

   RESPONSE:
   Region IV provided the organization charts in Attachment 1.

3. Please provide a staffing plan, or complete a listing using the suggested format below, of the professional (technical) full-time equivalents (FTE) applied to the radioactive materials program and uranium recovery program by individual and position.

[1]Estimated burden per response to comply with this voluntary collection request: 53 hours. Forward comments regarding burden estimate to the Records Management Branch (T-5 F52), U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001, and to the Paperwork Reduction Project (3150-0183), Office of Management and Budget, Washington, DC 20503. If an information collection does not display a currently valid OMB control number, NRC may not conduct or sponsor, and a person is not required to respond to, the information collection.

RESPONSE:

Region IV provided the organization charts in Attachment 1. The internal budget and staffing plan will be made available to the IMPEP Team during the review.

4. Please provide a listing of all new professional personnel hired into your radioactive materials program and uranium recovery program since the last review, indicate the date of hire; the degree(s) they received, if applicable; additional training; and years of experience in health physics or other disciplines, as appropriate.

RESPONSE:

Name	Position	Hire Date	Qualifications		Degree	Comment
			IMC	Date		
MATERIALS						
Allyce Bolger	Health Physicist	DNMS: 11/26/17	Interim: 1248, App B	Feb 2019	BS: Nuclear Engineering, Rensselaer Polytechnic Institute, NY	Emergency Response Coordinator Allegation / Enforcement Specialist
	Reactor Inspector	R1: 6/19/11	1245 App C1	May 2013		
DECOMMISSIONING						
Stephanie Anderson	Health Physicist	DNMS: 7/23/17	1248, App F	Aug 2018	BS: Electrical Engineering, Tuskegee University, AL	Fire Protection specialty
	Reactor Inspector	R1: 6/19/11	1245 C1	May 2013		
			1245 C2	May 2016		
Austin Roberts	Health Physicist	DNMS: 11/12/17	1248, App F (In Progress)	(In Progress)	BA: Math, Rice University MS: Engineering Management, Old Dominion University	Naval Nuclear Power Program
	Rx Systems Engineer	HQ: 1/25/15				
Chris Steely	Health Physicist	DNMS: 10/1/17	1248, App F	Oct 2018	BS: Nuclear Engineering Technology,	Operations specialty

Name	Position	Hire Date	Qualifications		Degree	Comment
			IMC	Date		
	Reactor Inspector	R4: 7/20/08	1245, C1	May 2010	Thomas Edison State University, NJ Naval Nuclear Power Program	
	License Examiner		1245, C10	Jan 2010 (Examiner) Nov 2010 (Chief Examiner)		
Richard Kaiser	Health Physicist	DNMS: 12/29/2014	1248, App F	On Active Military Duty: 2/3/2015 - 3/17/2016 2/23/2017 - Present	BS: Physics, Northwestern State University of Louisiana. MS: Physics, University of Texas at Arlington	

5. Please list all professional staff who have not yet met the qualification requirements for a radioactive materials license reviewer, inspector, or uranium recovery inspector. For each, list the courses or equivalent training/experience they need and a tentative schedule for completion of these requirements.

RESPONSE: Following is a summary of the staff who are in progress of their qualification requirements.

Allyce Bolger started in Region IV DNMS on November 26, 2017. She started her Manual Chapter 1248, Appendix F, Decommissioning qualification and changed to Appendix B, Materials Inspector qualification program, based on staff resources in the Division. On February 22, 2019, she obtained her interim qualification under Appendix B, for certain program codes. She lacks several OJTs for other program code modalities. It is anticipated that once those inspections are completed, she'll obtain her full qualification in March 2020.

Austin Roberts started Region IV DNMS on November 12, 2017. He started Manual Chapter 1248, Appendix F, Decommissioning qualification. Two training courses remain, along with an inspector accompaniment of a complex materials facility and some ISA's. The two courses include the following:

- Gathering Information through Inspections (Course 135) – scheduled for April 15-16 at PDC
- Environmental Monitoring for Radioactivity (H-111) – scheduled for April 29-May 3 at ORAU

Tentative completion of his full qualification is expected by July 2019.

Martha Poston-Brown has been in the Region IV DNMS office and is qualified as an inspector in multiple areas. Her most recent cross-qualification is IMC 1248, Appendix F, Decommissioning. She plans to perform her OJT at Ft. Calhoun Station (Reactor Decommissioning) in May 2019. Once completed, she'll obtain her full qualification.

Richard Kaiser started in Region IV DNMS on December 29, 2014. He started his Manual Chapter 1248 training; however, he was called to active military duty from 2/3/2015 - 3/17/2016 and again from 2/23/2017 – Present. He was extended for another year starting January 2019. It is unknown when he will return to the office.

6. Identify any changes to your qualification and training procedure that occurred during the review period.

RESPONSE:
Region IV implements the NRC qualification program, which is available under the respective manual chapter on the NRC public website. No action is required by the Region IV office.

7. Please identify the technical staff that left your radioactive materials program during the review period and indicate the date they left.

RESPONSE:
Region IV provided the technical staff that left the program in the organization charts in Attachment 1. In addition, a summary is provided below.

Name, Title	Date Left DNMS
Tony Gaines, Sr. HP, Materials Inspector	May 30, 2015
Lizette, Roldan, Health Physicist	May 2015
Rick Munoz, HP, Materials Inspector	January 9, 2016
Pete Hernandez, HP, Materials Inspector in training	April 2018
Casey Alldredge, HP, License Reviewer in training	October 2016
Gerry Schlapper, HP, Decommissioning	March 31, 2017
Don Stearns, HP, Decommissioning	April 29, 2017
Bernadette Baca, HP, Uranium Recovery	October 1, 2018
Binesh Tharakan, Health Physicist (SAO)	On rotation for 1 year (Oct 2018 – Oct 2019)

8. List any vacant positions in your radioactive materials program, the length of time each position has been vacant, and a brief summary of efforts to fill the vacancy.

RESPONSE:
Region IV provided the organizational charts in Attachment 1, which captures the vacancies during the review period. In addition, the budgeted FTE and staffing levels for RIV DNMS will be made available to the Team during the IMPEP review, along with a brief synopsis of the vacancies between 2014-2019.

II. Status of Materials Inspection Program

10. Please identify individual licensees or categories of licensees the Region is inspecting less frequently than called for in NRC's Inspection Manual Chapter (IMC) 2800 and for uranium recovery, and explain the reason for the difference. The list only needs to include the following information: license category or licensee name and license number, your inspection interval, and rationale for the difference.

RESPONSE:
For Materials Program under IMC 2800, Region IV inspects facilities at the frequency described in the manual and has not modified the frequency.

For Uranium Program under IMC 2641 for in-situ leach facilities, and IMC 2801 for decommissioning uranium sites, Region IV currently inspects at the frequency described in the manual and has implemented a process to document any changes to the inspection frequency. In addition, the Division is pursuing further clarifications for certain types of facilities described in the manual. Further specifics are provided below.

- Facilities that have licenses but have not started any construction activities, have not been inspected and the IMC 2641 does not specify when pre-operation or initial inspections must be performed. Going forward, the Region IV Divisional office will contact the licensee annually and document the status of the facility in order to determine when to start inspection activities. In addition, feedback form for IMC 2641 will be provided to the Program Office to further clarify this process.
- The decision to reschedule or postpone inspections for operating and decommissioning uranium facilities due to the status of licensee activities, weather, Region IV Divisional office staffing and workload, will be documented in an internal Memo approved by management, as specified in each of the IMCs.

11. Please provide the number of routine inspections of Priority 1, 2, and 3 licensees, as defined in IMC 2800 and the number of initial inspections that were completed during each year of the review period.

RESPONSE:
The information for materials licensees is available in WBL. No action required by Region IV.

Please see the following summary for Uranium recovery data. The detailed inspection information will be made available during the review. In addition, the master inspection plans (MIPs) generated for each year, will be made available during the IMPEP review.

URANIUM RECOVERY DATA		
FISCAL YEAR	**Total number of inspections**	**Number of overdue reports**
2014 (since May 2014)	7	5
2015	7	3
2016	18	0
2017	11	2
2018	14	1
TOTAL	**57**	**11**

12. Please submit a table, or a computer printout, that identifies inspections of Priority 1, 2, and 3 licensees and initial inspections that were conducted overdue.

At a minimum, the list should include the following information for each inspection that was conducted overdue during the review period:

(1) Licensee Name
(2) License Number
(3) Priority (IMC 2800)
(4) Last inspection date or license issuance date, if initial inspection
(5) Date Due
(6) Date Performed
(7) Amount of Time Overdue
(8) Date inspection findings issued

RESPONSE:
The information for materials licensees is available in WBL. No action required by Region IV.

The summary of Uranium Recovery inspections conducted overdue is available in Attachment 2.

13. Please submit a table or computer printout that identifies any Priority 1, 2, and 3 licensees and initial inspections that are currently overdue, per IMC 2800. At a minimum, the list should include the same information for each overdue inspection provided for Question 12 plus your action plan for completing the inspection. Also include your plan for completing the overdue inspections.

RESPONSE:
The information for materials licensees is available in WBL. There are no specific licensees that are overdue for routine inspections based on the criteria under IMC 2800. In addition, there are no overdue field office inspections based solely on the calculation criteria under IMC 2800. However, Region IV is making a concerted effort to inspect permanent field office(s) authorized on licenses, starting with Priority 1s, which have never been inspected. Therefore, these inspections could be considered overdue based on IMC 2800 criteria that "*Inspection of various field offices should be rotated to assess the licensee's entire program over several inspection cycles."* Some of the permanent field offices have not been inspected over several inspection cycles. More detailed information on the proposed permanent field office inspections will be available during the INPEP review, as requested.

The information for each Uranium Recovery license will be made available during the IMPEP review. In addition, a summary of the overdue inspections is provided in Attachment 2. During 2018 and 2019, Region IV made a concerted effort to perform all overdue inspections at operating and decommissioning uranium facilities. For those facilities that have a license and have not yet started construction activities, the Region IV Divisional office will contact the licensee annually and document the status of the facility in order to determine when to start inspection activities. This activity is being tracked in a Branch Action Item tracker. In addition, the Region has developed a more detailed Master Inspection Plan to track required inspections under the Uranium and Decommissioning programs.

14. Please provide the number of reciprocity licensees that were candidates for inspection per year as described in IMC 1220 and indicate the number of reciprocity inspections of candidate licensees that were completed each year during the review period.

RESPONSE:
During the past five calendar years, DNMS has only met the required inspection metric of 20% of reciprocity candidates once, in calendar year 2017, and only then by the then-Director instructing that a non-candidate whose inspection resulted in escalated enforcement will be counted towards the 20%. The table below summarizes the Region IV's performance with respect to reciprocity.

CY	Total Inspections (Candidates and Attempts)	Inspections of Pri-5	Inspections of Candidates (1, 2, 3)	Failed Attempted Inspections	Total Candidates (1, 2, 3)	% of Candidates (Inspections & Attempts)
2014	4	1	3	1	44	9.0
2015	5	2	5	0	40	12.5
2016	6	1	7*	0	46	13.0
2017	12	5	8	4	37	32.4
2018 thru Oct.	7	2	5	2	36	19.4
2018**	8	2	5	3	41	19.5

* Did not count one of the inspections as a candidate due to previous inspection performed during 2015.
** Updated data for 2018 after the Audit was completed.

III. Technical Quality of Inspections

15. What, if any, changes were made to your written inspection procedures during the reporting period?

RESPONSE:
Region IV uses the NRC inspection procedures available on the public website. No action required by Region IV.

16. Prepare a table showing the number and types of supervisory accompaniments made during the review period. Include:

Inspector Supervisor License Category Date

RESPONSE:
The information for Branch Chief accompaniments of inspectors is available in Attachment 3. In addition, the Region IV Policy Guides applicable to accompaniments will be made available to the IMPEP Team during the review.

17. Describe or provide an update on your instrumentation, methods of calibration, and laboratory capabilities. Are all instruments properly calibrated at the present time? Were there sufficient calibrated instruments available throughout the review period?

RESPONSE:
Region IV maintains an inventory list of instruments available to staff. The Project Manager (Eric Simpson, CHP) for the instrument program has been proactive in ensuring the number and types of instruments are available and calibrated for the nature of radioactive materials encountered in the region to support the reactor, materials, and uranium programs. The inventory list is substantial and will be made available to the IMPEP Team during the review. In addition, the procedures that govern the instrumentation program will also be made available to the IMPEP Team during the review.

IV. Technical Quality of Licensing Actions

18. How many specific radioactive material licenses does your program regulate at this time?

RESPONSE:
Region IV uses WBL to maintain the specific radioactive material licenses. No action required by Region IV.

19. Please identify any major, unusual, or complex licenses which were issued, received a major amendment, were terminated, decommissioned, submitted a bankruptcy notification or renewed in this period.

RESPONSE:
Please see the following Table for the actions that Region IV identified as major, unusual, or complex. Please note that Headquarters processes all bankruptcy notifications; therefore, those cases are not provided in the following table.

Action Type	Licensee	Request	License Number	Docket Number	Control Number
Complex (Amendment)	EPA, Region 8	Decommissioning	05-14892-02	030-08754	609555
Complex (Amendment)	University of Alaska, Fairbanks	Decommissioning	50-02430-07	030-01179	610951
Complex (New)	CH2M Hill, Inc.	New License (D&D)	43-35500-01	030-39123	609565
Complex (New)	Adanta, Inc.	New License (D&D) Suspended for first time	04-35485-01	030-39106	602775
Complex (New)	Adanta, Inc.	New D&D license; Suspended for second time	04-35509-01	030-39135	610270
Complex (Amendment)	Radiation Solutions, LLC	other service sources less than or equal to 100 Ci	11-35111-01	030-38691	591864
Complex (Amendment)	Dept of the Army, William Beaumont Army Medical Center	Medical Broad Scope changing to limited specific	42-05255-07	030-03260	591759
Complex (MML)	Hill AFB, US Air Force	Decommissioning	42-23539-01AF	030-28641	584307
TAR	Acuren USA	Instadose	50-32443-01	030-38596	594399
TAR	DBI, Inc.	Instadose	15-29301-02	030-38754	592504

Action Type	Licensee	Request	License Number	Docket Number	Control Number
TAR	Core Laboratories, Inc.	10 CFR 20.2002 alternate waste disposal method (ML16020A283)	42-26928-01	030-30429	609095 and 588388
TAR	University of Alaska Fairbanks	Decommissioning	50-02430-07	030-01179	590694
TAR	Providence Alaska	HDR	50-17838-01	030-13426	609722

20. Discuss any variances in licensing policies and procedures or exemptions from the regulations granted during the review period.

RESPONSE:
Region IV Division did not issue any variances in licensing policies and procedures during the review period. In following the agency's policy under 10 CFR 20.2002, alternate disposal, RIV DNMS licensing issued two exemption letters in 2018 (ML18200A034 and ML18036A715). These two exemptions grant permission to two separate entities to accept for disposal well-logging sandouts and well returns containing residual radioactive materials regulated by the NRC, without requiring an NRC license, based on the 10 CFR 20.2002 authorization granted to ProTechnics Division of Core Laboratories LP (ML18205A454).

The remaining exemptions granted during the review period were under 10 CFR 30.12 exemption requests. Following are the total number of 10 CFR 30.12 exemptions processed in accordance with the guidance provided by the Program Office. Further details are available upon request.

Fiscal Year	Total Number of Exemptions Processed
FY 2014	10
FY 2015	14
FY 2016	17
FY 2017	35
FY 2018	38
FY 2019 until 1/31/19	13
TOTAL	127

21. What, if any, changes were made in your written licensing procedures (new procedures, updates, policy memoranda, etc.) during the reporting period?

RESPONSE:
Region IV utilizes the guidance provided in the NUREG-1556 series and the information provided on the Materials Licensees Toolkits on the NRC website.

22. Identify by licensee name and license number any renewal applications that have been pending for one year or more. Please indicate why these reviews have been delayed and describe your action plan to reduce the backlog.

RESPONSE:

Region IV summarized the renewals that exceeded one year or more in the Table below. In addition, the Region reviewed and summarized all licensing actions that exceeded the internal processing metric, and will provide the information to the IMPEP Team during the review, as requested.

FY, Action Type Control Number Process Time	Licensee	License Number	Docket Number	Reason For Delay
FY16, Renewal 585345 454 days	Providence Alaska Medical Center	50-17838-01	030-13426	There were 72 renewals during FY16, which is a significantly large number of renewals to be performed by 4 fully qualified license reviewers. In addition, the license reviewer was working on several working groups throughout the year to support the licensing program. For this particular renewal, the initial application was incomplete and had to be resubmitted, along with several additional requests for information that delayed the issuance of the license.
FY16, Renewal 584286 585 days	Calumet Montana Refining	25-27488-01	030-33433	There were 72 renewals during FY16, which is a significantly large number of renewals to be performed by 4 fully qualified license reviewers. In addition, the license reviewer was working several working groups throughout the year to support the licensing program. For this particular renewal, there were a number of requests for additional information and inadequate or delayed responses from the licensee.

V. Technical Quality of Incident and Allegation Activities

23. For Agreement States, please provide a list of any reportable incidents not previously submitted to NRC (See Procedure SA-300, *Reporting Material Events*, for additional guidance, OMB clearance number 3150-0178).

RESPONSE:
Question #23 is not applicable to Region IV.

24. Identify any changes to your procedures for responding to incidents and allegations that occurred during the period of this review.

RESPONSE:
Region IV made changes to its procedures for responding to incidents and allegations. The procedures are identified below and will be made available to the IMPEP Team during the review.

- PG 9007B, “Reactor Inspection and Licensee Event Report (LER) Guidance for DNMS Staff, dated January 3, 2019
- PG 9007B, “Handling of Materials Licensee Event Reports (LERs) by DNMS Staff” dated August 26, 2009.
- 0858.16, “Management of Allegations,” January 14, 2015
- 0858.15, “Management of Allegations,” May 26, 2014

C. NON-COMMON PERFORMANCE INDICATORS

I. Compatibility Requirements (Questions 25-28)

II. Sealed Source and Device (SS&D) Evaluation Program (Questions 29-30)

III. Low-Level Radioactive Waste Disposal Program (Question 31)

RESPONSE:
The above indicators and associated Questions 25 through 31 are not applicable to Region IV.

IV. Uranium Recovery Program

32. Please include information on the following questions in Section A, as they apply to the Uranium Recovery Program:

    Technical Staffing and Training - Questions 2-9
    Status of Materials Inspection Program - Questions 10-14
    Technical Quality of Inspections - Questions 15-17
    Technical Quality of Licensing Actions - Questions 18-22
    Technical Quality of Incident and Allegation Activities - Questions 23-24

    RESPONSE:
    The information regarding the Uranium Recovery program data is provided with the above responses.

ATTACHMENT 2
Uranium Recovery
Overdue Inspections

RIV DNMS URANIUM RECOVERY
Inspections Overdue

Licensee Name	License Number	Docket	Frequency (mos.)	Start Date	Exit Meeting Date	Report Issued	Report Time Requirement	Report Due Date	Days to issue report	Report Number	Date, Last inspection/ license issuance	Inspection Due Date	Due Date (includes grace period)	Inspection Overdue?	Days Inspection was Overdue	>30 days for Report Issued (or 45 days for Team statement)?	>60 days from Onsite Date to Report Issued
Power Resources, Inc. Smith Ranch	SUA-1548	040-08964	6	05/20/14	05/22/14	08/01/14	30	06/21/14	71	2014-001	09/09/13	03/09/14	04/09/14	YES	41	YES	YES
Uranerz Energy Corp. Nichols Ranch	SUA-1597	040-09067	6	06/23/14	06/24/14	09/26/14	30	07/24/14	94	2014-001	11/18/13	05/18/14	06/18/14	YES	5	YES	YES
Ur-Energy USA Lost Creek ISR, LLC	SUA-1598	040-09068	6	01/27/15	08/20/15	09/11/15	45	10/04/15	22	2015-001	06/25/14	12/25/14	01/25/15	YES	2	NO	YES
Uranerz Energy Corp. Nichols Ranch	SUA-1597	040-09067	6	03/17/15	03/18/15	09/29/15	45	05/02/15	195	2015-001	06/23/14	12/23/14	01/23/15	YES	53	YES	YES
Power Resources, Inc. Smith Ranch	SUA-1548	040-08964	6	04/14/15	04/16/15	07/14/15	45	05/31/15	89	2015-001	05/20/14	11/20/14	12/20/14	YES	115	YES	YES
Uranium One-Willow Creek	SUA-1341	040-08502	6	05/27/15	07/13/15	08/07/15	30	08/12/15	25	2015-001	09/23/14	03/23/15	04/23/15	YES	34	NO	YES
Ur-Energy USA Lost Creek ISR, LLC	SUA-1598	040-09068	6	12/01/15	12/29/15	01/07/16	30	01/28/16	9	2015-002	01/27/15	07/27/15	08/27/15	YES	96	NO	NO
Uranerz Energy Corp. Nichols Ranch	SUA-1597	040-09067	6	01/25/16	01/28/16	02/26/16	45	03/13/16	29	2016-001	03/17/15	09/17/15	10/17/15	YES	100	NO	NO
Cameco Crow Butte Resources	SUA-1534	040-08943	12	03/08/16	03/17/16	04/12/16	30	04/16/16	26	2016-001	06/03/14	06/03/15	09/03/15	YES	187	NO	NO
Power Resources, Inc. Smith Ranch	SUA-1548	040-08964	6	06/21/16	10/25/16	11/23/16	30	11/24/16	29	2016-001	04/14/15	10/14/15	11/14/15	YES	220	NO	YES
Uranium One-Willow Creek	SUA-1341	040-08502	6	07/26/16	07/28/16	08/26/16	30	08/27/16	29	2016-001	05/27/15	11/27/15	12/27/15	YES	212	NO	NO
UNC Church Rock	SUA-1475	040-08907	24	08/16/16	08/16/16	09/07/16	30	09/15/16	22	2016-001	07/18/13	07/18/15	01/18/16	YES	211	NO	NO
Kennecott Energy-Sweetwater	SUA-1350	040-08584	24	09/20/16	09/20/16	10/03/16	30	10/20/16	13	2016-001	08/28/13	08/28/15	02/28/16	YES	205	NO	NO

RIV DNMS URANIUM RECOVERY
Inspections Overdue

Licensee Name	License Number	Docket	Frequency (mos.)	Start Date	Exit Meeting Date	Report Issued	Report Time Requirement	Report Due Date	Days to issue report	Report Number	Date, Last inspection/ license issuance	Inspection Due Date	Due Date (includes grace period)	Inspection Overdue?	Days Inspection was Overdue	>30 days for Report Issued (or 45 days for Team statement)?	>60 days from Onsite Date to Report Issued
Pathfinder Shirley Basin	SUA-442	040-06622	24	09/21/16	09/21/16	10/19/16	30	10/21/16	28	2016-001	09/25/13	09/25/15	03/25/16	YES	180	NO	NO
ExxonMobil Highland	SUA-1139	040-08102	24	09/22/16	09/22/16	10/21/16	30	10/22/16	29	2016-001	09/24/13	09/24/15	03/24/16	YES	182	NO	NO
Ur-Energy USA Lost Creek ISR, LLC	SUA-1598	040-09068	6	09/27/16	11/22/16	12/21/16	45	01/06/17	29	2016-001	12/01/15	06/01/16	07/01/16	YES	88	NO	YES
Strata Energy, Inc. Ross	SUA-1601	040-09091	6	01/31/17	02/02/17	03/02/17	30	03/04/17	28	2017-002	06/07/16	12/07/16	01/07/17	YES	24	NO	NO
Homestake Mining	SUA-1471	040-08903	6	04/24/17	06/12/17	07/07/17	30	07/12/17	25	2017-001	08/24/16	02/24/17	03/24/17	YES	31	NO	YES
Ur-Energy USA Lost Creek ISR, LLC	SUA-1598	040-09068	6	05/23/17	07/06/17	08/04/17	30	08/05/17	29	2017-001	09/27/16	03/27/17	04/27/17	YES	26	NO	YES
Cameco Crow Butte Resources	SUA-1534	040-08943	12	06/20/17	06/22/17	07/19/17	30	07/22/17	27	2017-001	03/08/16	03/08/17	06/08/17	YES	12	NO	NO
Ur-Energy USA Lost Creek ISR, LLC	SUA-1598	040-09068	6	05/22/18	05/24/18	06/22/18	30	06/23/18	29	2018-001	10/17/17	04/17/18	05/17/18	YES	5	NO	NO
Power Resources, Inc. Smith Ranch	SUA-1548	040-08964	6	06/25/18	06/28/18	07/27/18	30	07/28/18	29	2018-001	11/14/17	05/14/18	06/14/18	YES	11	NO	NO
UMETCO - Gas Hills	SUA-648	040-00299	24	08/28/18	08/28/18	09/21/18	30	09/27/18	24	2018-001	06/05/12	06/05/14	12/05/14	YES	1362		NO
Western Nuclear - Split Rock	SUA-56	040-01162	24	08/28/18	08/28/18	09/18/18	30	09/27/18	21	2018-001	05/05/10	05/05/12	11/05/12	YES	2122		NO
Pathfinder Lucky MC	SUA-672	040-02259	24	08/28/18	08/28/18	09/19/18	30	09/27/18	22	2018-001	05/04/10	05/04/12	11/04/12	YES	2123	NO	NO
Anadarko Bear Creek	SUA-1310	040-08452	24	08/31/18	08/31/18	09/26/18	30	09/30/18	26	2018-001	09/22/08	09/22/10	03/22/11	YES	2719		NO

RIV DNMS URANIUM RECOVERY
Inspections Overdue

Licensee Name	License Number	Docket	Frequency (mos.)	Start Date	Exit Meeting Date	Report Issued	Report Time Requirement	Report Due Date	Days to issue report	Report Number	Date, Last inspection/ license issuance	Inspection Due Date	Due Date (includes grace period)	Inspection Overdue?	Days Inspection was Overdue	>30 days for Report Issued (or 45 days for Team statement)?	>60 days from Onsite Date to Report Issued
Cameco Crow Butte Resources	SUA-1534	040-08943	12	11/05/18	11/08/18	12/06/18	30	12/08/18	28	2018-001	06/20/17	06/20/18	09/20/18	YES	46	NO	NO
ANC-Gas Hills	SUA-667	040-04492	24	01/22/19	03/01/19		30	03/31/19			05/02/07	05/02/09	11/02/09	YES	3368	n/a	NO
Hydro Resources Crownpoint	SUA-1580	040-08968	12					01/00/00			01/05/98	01/05/99	04/05/99	n/a			NO
Uranium One-Moore Ranch	SUA-1596	040-09073	12					01/00/00			09/30/10	09/30/11	12/30/11	n/a			NO
Powertech Dewey Burdock	SUA-1600	040-09075	12					01/00/00			04/08/14	04/08/15	07/08/15	n/a			NO
AUC Reno Creek	SUA-1602	040-09092	12					01/00/00			02/17/17	02/17/18	05/17/18	n/a		n/a	NO

ATTACHMENT 3
Branch Chief Accompaniments

BC Accompaniments of Qualified Inspectors

(5 Year Summary)

Inspector	Branch	Supervisor	License Category	Date
Anderson	FCDB	Pruett	Rx Decomm	7/12/18
Baca	FCDB	Kellar	UR	8/28/17
Browder	FCDB	Kellar	SNM	10/27/15
Browder	FCDB	Kellar	Rx Decomm	3/21/16
Browder	FCDB	Kellar	Rx Decomm	5/9/17
Browder	FCDB	Pruett	Rx Decomm	7/12/18
Dykert	MLIB	Vasquez	Materials	9/14-18/15
Dykert	MLIB	Shaffer	Materials	June 2016
Dykert	MLIB	Hay	Materials	Nov 2017
Dykert	MLIB	Hay	Materials	Jan 2018
Dykert	MLIB	Pruett	Materials	9/27/18
Erickson	SAO	Shaffer	Materials	June 2015
Erickson	SAO	Campbell	Materials	September 2016
Erickson	SAO	Thompson	Materials	11/14/18
Evans	FCDB	Vegel	Rx Decomm	1/14/14
Evans	FCDB	Kellar	Rx Decomm	9/15/14
Evans	FCDB	Kellar	UR	11/3/15
Evans	FCDB	Kellar	Rx Decomm	2/10/16
Evans	FCDB	Not Performed	Limited inspections – out on sick leave in 2017	
Evans	FCDB	Katanic	Complex Decommissioning	11/27/18
Gaines	MLIB	Vasquez	Materials	9/3/14
Gersey	FCDB	Spitzberg	UR	2/27/14
Gersey	FCDB	Shaffer	UR	9/23/14
Gersey	FCDB	Kellar	UR	11/3/15
Gersey	FCDB	Not Performed	Limited Inspections & site visits in 2016	
Gersey	FCDB	Kellar	Rx Decomm	11/13/17
Hammond	MLIB	Whitten	Materials	12/8-10/14
Hammond	MLIB	Whitten	Materials	Mar 2015
Hammond	MLIB	Not Required	Only performed one inspection in March 2016	
Hammond	MLIB	Not Required	Did not perform any inspections	
Hammond	MLIB	Hay	Materials	May 2018

BC Accompaniments of Qualified Inspectors
(5 Year Summary)

Hanson	MLIB	Whitten	Materials	8/6/14
Hanson	MLIB	Whitten	Materials	6/16/15
Hanson	MLIB	Not Required	Only performed one inspection in March 2016	
Hanson	MLIB	Not Required	Did not perform any inspections in 2017	
Hanson	MLIB	Pruett	Materials	5/23/18
Katanic	MLIB	Shaffer	Materials	5/12-14/15
Katanic	MLIB	Kellar	Materials	9/6/16
Katanic	MLIB	Hay	Materials	Nov 2017
Katanic	FCDB	Pruett	ISFSI / Special	9/10/18
Munoz	MLIB	Vasquez	Materials	9/23/14
Munoz	MLIB	Vasquez	Materials	6/9-10/15
Poston	FCDB	Vasquez	Materials	3/9-13/15
Poston	FCDB	Kellar	Materials	8/15/16
Poston	FCDB	Kellar	UR	8/28/17
Poston	FCDB	Howell	UR	11/5-6/18
Poston	FCDB	Katanic	Complex Decommissioning	11/27/18
Roldan	MLIB	Not Performed	Started performing inspections in June 2014	
Roldan	MLIB	Not Performed	Performed inspections and transferred to NMSS in May 2015	
Schlapper	FCDB	Kellar	Reactor decom	6/24/14
Schlapper	FCDB	Kellar	ISFSI	7/15/15
Schlapper	FCDB	Whitten	Complex Decommissioning	July 2016
Simmons	MLIB	Whitten	Materials	Dec 2013 (tracked by FY)
Simmons	MLIB	Whitten	Materials	3/9/15
Simmons	MLIB	N/A	No inspections performed in 2016	
Simmons	MLIB	N/A	No inspections performed in 2017	
Simmons	MLIB	Thompson	Materials	Dec 2018
Stearns	MLIB	Vasquez	Materials	8/5/14
Stearns	FCDB	Kellar	Complex Decommissioning	3/24/15
Stearns	FCDB	Whitten	Complex Decommissioning	July 2016
Steely	FCDB	Katanic	Complex Decommissioning	11/27/18
Steely	FCDB	Pruett	Rx Decomm	10/24/18
Thompson	MLIB	Vasquez	Materials	10/3/14
Thompson	MLIB	Shaffer	Materials	1/26-30/15

BC Accompaniments of Qualified Inspectors
(5 Year Summary)

Thompson	MLIB	Kellar	Materials	6/20-23/16
Thompson	MLIB	Hay	Materials	Nov 2017
Thompson	MLIB	Hay	Materials	July 2018
Torres	MLIB	Whitten	Materials	June 2014
Torres	MLIB	Whitten	Materials – 30.12	3/9-11/15
Torres	MLIB	Campbell	Materials	Sept 2016
Torres	MLIB	Not Required	No inspections performed in 2017	
Torres	MLIB	Not Required	No inspections performed in 2018	
vonEhr	MLIB	Shaffer	Materials	April 2017
vonEhr	MLIB	Pruett	Materials	July 2018

BRANCH CHIEF ACCOMPANIMENT FOR INSPECTORS

Inspector Name	Branch	CY 2014	CY 2015	CY 2016	CY 2017	CY 2018	CY 2019	2020
Anderson, Stephanie	FCDB					Pruett-July		
Baca, Bernadette	FCDB		(In-Training)	(In-Training)	Kellar-August	(Transferred to DRS)		
Brookhart, Lee	FCDB	Vegel-January Spitzberg-February	Kellar-July	Kellar-December	Kellar-December	Pruett-May	Katanic-January	
Browder, Rachel	FCDB		Kellar-October	Kellar-March	Kellar-May	Pruett-July		
Dykert, Jason	MLIB		Vasquez / September	Shaffer - June	Hay / November	Hay / January		
Erickson, Randy	DNMS		Shaffer / June	Campbell - September		Thompson / November		
Evans, Rob	FCDB	Vegel - January Kellar-September	Kellar - November	Kellar-February	*Not Performed* *(Inspected 1/2 year)*	Katanic-November		
Gaines, Tony	MLIB	Vasquez / September						
Gersey, Linda	FCDB	Spitzberg-February	Kellar-November	*Not Performed* *(Inspected 1/2 year)*	Kellar-November	*Not Performed*	Thompson-February	
Hammond, Michelle	MLIB (Part-time Inspector)	Whitten / December	Whitten - March	(Inspection March '16)		Hay / May		
Hanson, Latischa	MLIB (Part-time Inspector)	Whitten / August	Whitten - June	(Inspection March '16)		Pruett-May		
Katanic, Janine	MLIB		Shaffer - May	Kellar /September	Hay / Nov 2017	Pruett-September		
Munoz, Rick	MLIB	Vasquez / September	Vasquez - June					
Poston, Marti	FCDB	(Rotation to ACES)	Vasquez - March	Kellar / August	Kellar-August	Howell-November Katanic-November		
Schlapper, Gerry	FCDB	Kellar-June	Kellar-July	Whitten - July				
Simmons, Michelle	MLIB (Part-time Inspector)	Whitten / December 2013 (tracked by FY)	Whitten - March			Thompson / December		
Simpson, Eric	FCDB	Spitzberg-February Vegel-January	Kellar-July	Kellar-December (tracked by FY)	Howell - November Kellar - December	Pruett/May Pruett/September	Katanic-January	
Smith, Chris	FCDB					Pruett/September	Katanic-January	
Stearns, Don	FCDB	Vasquez / August	Kellar/March	Whitten - July				
Steely, Chris	FCDB					Katanic-November Pruett-October		
Thompson, James	MLIB	Vasquez / October	Shaffer-January	Kellar / June	Hay / November	Hay / July		
Torres, Roberto	MLIB (Part-time Inspector)	Whitten / June	Whitten - February Whitten - March	Campbell / September				

Inspector Name	Branch	CY 2014	CY 2015	CY 2016	CY 2017	CY 2018	CY 2019	2020
vonEhr, Jason	MLIB				Shaffer / April	Pruett / July		
Note: PG 1038 specifies that part-time inspectors should be accompanied every 18 months.								
Note: Grey - means not required								