



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

April 29, 2020

Todd Parfitt, Director  
Wyoming Department of Environmental Quality  
200 West 17<sup>th</sup> Street  
Cheyenne, WY 82002

Dear Mr. Parfitt:

The U.S. Nuclear Regulatory Commission (NRC) uses the Integrated Materials Performance Evaluation Program (IMPEP) in the review of Agreement State and NRC radiation control programs. Enclosed for your review is the draft IMPEP report, which documents the results of the Agreement State review conducted remotely with Wyoming on March 24-26, 2020. The team's preliminary findings were discussed with you and your staff on the last day of the review. The team's proposed recommendations are that the Wyoming Agreement State Program be found adequate to protect public health and safety and compatible with the NRC's program.

The NRC conducts periodic reviews of radiation control programs to ensure that public health and safety are adequately protected from the potential hazards associated with the use of radioactive materials and that Agreement State programs are compatible with the NRC's program. The IMPEP process uses a team comprised of Agreement State and NRC staff to perform the reviews. All reviews use common criteria in the assessment and place primary emphasis on performance. The final determination of adequacy and compatibility of each program, based on the team's report, is made by the Chair of the Management Review Board (MRB) after receiving input from the MRB members. The MRB is composed of NRC senior managers and an Agreement State program manager.

In accordance with procedures for implementation of IMPEP, we are providing you with a copy of the draft report for your review and comment prior to submitting the report to the MRB. Comments are requested within 4 weeks from your receipt of this letter. This schedule will permit the issuance of the final report in a timely manner that will be responsive to your needs.

The team will review the response, make any necessary changes to the report, and issue it to the MRB as a proposed final report. The MRB meeting is scheduled for June 23, 2020, at 1:00 pm EDT. The NRC may conduct this MRB meeting remotely to address potential restrictions imposed by the COVID-19 pandemic. Otherwise, The NRC will provide invitational travel for you or your designee to attend the MRB meeting at the NRC Headquarters in Rockville, Maryland. The NRC has Skype capability if it is more convenient for the State to participate through this medium. Please contact me if you desire to participate in the meeting using Skype.

T. Parfitt

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If you have any questions regarding the enclosed report, please contact me at 301-415-0324 or Duncan White at 301-415-2598.

Thank you for your cooperation.

Sincerely,

Leira Y. Cuadrado, Acting Chief  
State Agreement and Liaison Programs Branch  
Division of Materials Safety, Security, State,  
and Tribal Programs  
Office of Nuclear Material Safety and Safeguards

Enclosure:  
2020 Draft IMPEP Report

SUBJECT: WYOMING FY2020 DRAFT IMPEP REPORT

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INTEGRATED MATERIALS PERFORMANCE EVALUATION PROGRAM

REVIEW OF THE WYOMING PROGRAM

MARCH 24-26, 2020

**DRAFT REPORT**

Enclosure

## **EXECUTIVE SUMMARY**

The results of the Integrated Materials Performance Evaluation Program (IMPEP) review of the Wyoming Agreement State Program (Wyoming) are discussed in this report. The review was conducted during the period of March 24-26, 2020. This is the first IMPEP review for Wyoming since their Agreement went into effect on September 30, 2018.

Based on the results of this review, Wyoming's performance was found satisfactory for all the applicable performance indicators. The team did not make any recommendations.

Accordingly, the team recommends that the Wyoming Agreement State Program be found adequate to protect public health and safety and compatible with the NRC's program. The team recommends that the next IMPEP review take place in approximately 4 years with a periodic meeting in approximately 2 years.

## 1.0 INTRODUCTION

The Wyoming Agreement State Program review was conducted remotely during the period of March 24-26, 2020, by a team comprised of technical staff members from the U.S. Nuclear Regulatory Commission (NRC) and the State of Washington. Team members are identified in Appendix A. The review was conducted in accordance with the "Agreement State Program Policy Statement," published in the *Federal Register* on October 18, 2017 (82 FR 48535), and NRC Management Directive (MD) 5.6, "Integrated Materials Performance Evaluation Program (IMPEP)," dated July 24, 2019. Preliminary results of the review, which covered the period of September 30, 2018 to March 26, 2020 were discussed with Wyoming managers on the last day of the review.

In preparation for the review, a questionnaire addressing the performance indicators was sent to Wyoming on October 10, 2019. Wyoming provided its response to the questionnaire on February 28, 2020. A copy of the questionnaire response is available in the NRC's Agencywide Documents Access and Management System (ADAMS) using the Accession Number ML20090F939.

The Wyoming Agreement State Program is administered by the Uranium Recovery Program (the Program) which is located in the Land Quality Division (the Division). The Division is part of the Department of Environmental Quality (the Department). Organization charts for Wyoming are available in ADAMS (Accession Number ML20090G323).

At the time of the review, Wyoming's agreement was limited to the regulation of 14 specific licenses authorizing possession and use of 11e.(2) byproduct material and source material involved in the extraction or concentration of uranium or thorium in source material and ores at uranium and thorium milling facilities. The review focused on the radiation control program as it is carried out under Section 274b. (of the Atomic Energy Act of 1954, as amended) Agreement between the NRC and the State of Wyoming.

The team evaluated the information gathered against the established criteria for each applicable performance indicators and made a preliminary assessment of the Wyoming program's performance.

## 2.0 PREVIOUS IMPEP REVIEW AND STATUS OF RECOMMENDATIONS

This is the first IMPEP review for Wyoming since its agreement went into effect on September 30, 2018.

## 3.0 COMMON PERFORMANCE INDICATORS

The Wyoming Agreement State Program is limited to regulatory oversight of uranium recovery facilities. In accordance with Section V.H.8. of NMSS Interim SA Procedure SA-100 "Implementation of the Integrated Materials Performance Evaluation Program (IMPEP)," programs where the agreement only includes non-common indicators (e.g., uranium recovery program or low level radioactive waste disposal program), the team

will 1) review each sub-element independently as a common performance indicator and attribute a rating to each indicator; 2) use the specific guidance for reviewing the non-common performance indicators contained in NMSS Procedures SA-109 and SA-110; 3) evaluate the indicator Legislation, Regulation, and Other Program Elements as a non-common indicator as specified in NMSS Procedure SA-107; and 4) determine the overall adequacy and compatibility finding in accordance with the rating attributed to each sub-element as described in MD 5.6.

The objective is to determine if Wyoming's program is adequate to protect public health and safety, and the environment. Five elements are used to make this determination: (1) Technical Staffing and Training; (2) Status of Uranium Recovery Inspection Program; (3) Technical Quality of Inspections; (4) Technical Quality of Licensing Actions; and (5) Technical Quality of Incident and Allegation Activities.

The Program currently has 14 uranium mill licenses. There are 5 active in-situ recovery (ISR) facilities, 6 decommissioning conventional mill facilities, 1 conventional mill that accepts 11e.(2) byproduct material for disposal, and 2 licenses for ISR facilities that have been licensed but have not been constructed.

### 3.1 Technical Staffing and Training

The ability to conduct effective licensing and inspection programs is largely dependent on having a sufficient number of experienced, knowledgeable, well-trained technical personnel. Under certain conditions, staff turnover could have an adverse effect on the implementation of these programs and could affect public health and safety. Apparent trends in staffing must be assessed. Review of staffing also requires consideration and evaluation of the levels of training and qualification. The evaluation standard measures the overall quality of training available to, and taken by, uranium recovery program personnel.

#### a. Scope

The team used the guidance in State Agreements procedure SA-110, "Reviewing the Non-Common Performance Indicator: Uranium Recovery Program," and evaluated Wyoming's performance with respect to the following performance indicator objectives:

- Qualified and trained technical staff are available to license, regulate, control, inspect, and assess the operation and performance of the uranium recovery program.
- Qualification criteria for new uranium recovery technical staff are established and are being followed or qualification criteria will be established if new staff members are hired.
- Any vacancies, especially senior-level positions, are filled in a timely manner.
- There is a balance in staffing the uranium recovery licensing and inspection programs.
- Management is committed to training and staff qualification.

- Individuals performing uranium recovery licensing and inspection activities are adequately qualified and trained to perform their duties.
- Uranium recovery license reviewers and inspectors are trained and qualified in a reasonable period of time.

b. Discussion

The Wyoming Program is comprised of eight staff members that equals 7.4 full-time equivalents when fully staffed. Of the eight staff members, three work in other Division programs with expertise in disciplines required by the Program. During the review period, one of the staff members left the Program and a replacement was hired who is expected to report for duty on May 4, 2020. This position was vacant for 4 months. Wyoming has a training program equivalent to NRC training requirements in NRC's IMC 1248.

The staff member who left the program during the review period was experienced and possessed detailed knowledge of the licensed facilities. Although the team noted that the Program continued to meet its inspections and licensing milestones, the Program Manager had to take on additional duties and perform some technical work which reduced the time spent on his program management responsibilities.

c. Evaluation

The team determined that, during the review period, Wyoming met the performance indicator objectives listed in Section 3.1.a. Based on the criteria in MD 5.6, the team recommends that Wyoming's performance with respect to the indicator, Technical Staffing and Training, be found satisfactory.

d. MRB Chair's Determination

The final report will present the MRB Chair's determination regarding this indicator.

3.2 Status of Uranium Recovery Inspection Program

Periodic inspections of licensed operations are essential to ensure that activities are being conducted in compliance with regulatory requirements and consistent with good safety and security practices. The frequency of inspections is specified in IMC 2801 "Uranium Mill and 11e.(2) Byproduct Material Disposal Site and Facility Inspection Program," and is dependent on the amount and type of radioactive material, the type of operation licensed, and the results of previous inspections. There must be a capability for maintaining and retrieving statistical data on the status of the inspection program.

a. Scope

The team used the guidance in State Agreements procedure SA-110, "Reviewing the Non-Common Performance Indicator: Uranium Recovery Program," and evaluated Wyoming's performance with respect to the following performance indicator objectives:



- The uranium recovery facility is inspected at prescribed frequencies.
- Statistical data on the status of the inspection program are maintained and can be retrieved.
- Deviations from inspection schedules are coordinated between uranium recovery technical staff and management.
- There is a plan to perform any overdue inspections and reschedule any missed or deferred inspections; or a basis has been established for not performing overdue inspections or rescheduling any missed or deferred inspections.
- Inspection findings are communicated to licensees in a timely manner.

b. Discussion

The Program performed 20 inspections during the review period. None of the inspections were conducted overdue during the review period. Wyoming's inspection frequencies are the same for similar license types in IMC 2801 "Uranium Mill and 11e.(2) Byproduct Material Disposal Site And Facility Inspection Program".

A sampling of 20 inspection reports indicated that one of the inspection findings were communicated to the licensees beyond Wyoming's goal of 30 days or 45 days for team inspections, after the inspection exit. The one inspection report was issued 13 days beyond the 30-day requirement to obtain management approval required for certain violations.

c. Evaluation

The team determined that, during the review period, Wyoming met the performance indicator objectives listed in Section 3.2.a. Based on the criteria in MD 5.6, the team recommends that Wyoming's performance with respect to the indicator, Status of Uranium Recovery Inspection Program, be found satisfactory.

d. MRB Chair's Determination

The final report will present the MRB Chair's determination regarding this indicator.

3.3 Technical Quality of Inspections

Inspections, both routine and reactive, provide reasonable assurance that licensee activities are carried out in a safe and secure manner. Accompaniments of inspectors performing inspections, and the critical evaluation of inspection records, are used to assess the technical quality of an inspection program.

a. Scope

The team used the guidance in State Agreements procedure SA-110, "Reviewing the Non-Common Performance Indicator: Uranium Recovery Program," and evaluated Wyoming's performance with respect to the following performance indicator objectives:

- Inspections of uranium recovery licensed activities focus on health, safety, and security.
- Inspection findings are well-founded and properly documented in reports.
- Management promptly reviews inspection results.
- Procedures are in place and used to help identify root causes and poor licensee performance.
- Inspections address previously identified open items, non-compliance, and violations.
- Inspection findings lead to appropriate and prompt regulatory action.
- Supervisors, or senior staff as appropriate, conduct annual accompaniments of each uranium recovery inspector to assess performance and assure consistent application of inspection policies.
- Inspection guides are consistent with NRC guidance.
- An adequate supply of calibrated survey instruments is available to support the inspection program.

b. Discussion

The team evaluated 20 inspection files and interviewed all inspectors involved in the Program during the review period. The files reviewed represented a range of uranium recovery licensing activities in different stages of operation and disposal except for decommissioning. The Program's six conventional mills undergoing decommissioning are not due for inspection until later in 2020. The team interviewed inspectors to assess their preparation for the inspections, guidance and/or protocols for inspection procedures, the depth and content of the actual inspections, and the appropriateness of inspection findings. The team determined that the Program inspections covered all technical areas in IMC 2801.

During the week of October 1, 2019, the team accompanied five Program inspectors at three facilities. The inspections were thorough, included operational and record reviews, and violations were communicated by the inspector to the licensee during exit interviews. The inspectors focused on interviews with licensee personnel, performed confirmatory radiation surveys, and observation of operations in progress. The inspector accompaniments are identified in Appendix B.

The Program Manager accompanied all inspectors in 2018 and 2019. The only inspector not accompanied was the Program Manager. The Program is currently reviewing different ways to ensure accompaniments of the Program Manager if he conducts inspections in the future.

c. Evaluation

The team determined that during the review period, Wyoming met the performance indicator objectives listed in Section 3.3.a, except for:

- Supervisors, or senior staff as appropriate, conduct annual accompaniments of each uranium recovery inspector to assess performance and assure consistent application of inspection policies.

The Program Manager conducted inspections in 2019 and was not accompanied. The team concluded that this was not a performance issue since the reports for the inspections conducted by this individual were thorough and complete and the team accompanied the Program Manager during this review and no performance issues were identified. The team also noted that the Program is taking prompt action to address this matter so that it is not repeated in the future.

Based on the IMPEP evaluation criteria in MD 5.6, the team recommends that Wyoming's performance with respect to the indicator, Technical Quality of Inspections, be found satisfactory.

d. MRB Chair's Determination

The final report will present the MRB Chair's determination regarding this indicator.

3.4 Technical Quality of Licensing Actions

The quality, thoroughness, and timeliness of licensing actions can have a direct bearing on public health and safety, as well as security. An assessment of licensing procedures, implementation of those procedures, and documentation of communications and associated actions between the Wyoming licensing staff and regulated community is a significant indicator of the overall quality of the licensing program.

a. Scope

The team used the guidance in State Agreements procedure SA-110, "Reviewing the Non-Common Performance Indicator: Uranium Recovery Program," and evaluated Wyoming's performance with respect to the following performance indicator objectives:

- Licensing action reviews are thorough, complete, consistent, and of acceptable technical quality with health, safety, and security issues properly addressed.
- Applicable uranium recovery guidance documents are available to reviewers and are followed.
- Essential elements of license applications have been submitted and meet current NRC or Agreement State regulatory guidance (e.g., financial assurance, etc.)
- Uranium recovery license reviewers, if applicable, have the proper signature authority for the cases they review independently.
- License conditions are stated clearly and can be inspected.
- Deficiency letters clearly state regulatory positions and are used at the proper time.
- Reviews of renewal applications demonstrate a thorough analysis of a licensee's inspection and enforcement history.

- Licensing practices for risk significant radioactive materials are appropriately implemented including fingerprinting orders (Part 37 equivalent).
- Documents containing sensitive security information are properly marked, handled, controlled, and secured.

b. Discussion

During the review period, the Program completed 13 licensing actions that included amendments and financial assurance actions. The team reviewed documentation for all 13 actions which included reviews by all license reviewers in the Program. The licensing actions examined included: combination of a Wyoming Permit to Mine and Source Material license, changes to land use survey, an amendment request to allow for a different type of lixiviant at an ISR facility, and reduction in the amount of financial assurance required.

The licensing actions examined by the team were found to be complete, consistent, and decisions were appropriately documented and of overall acceptable technical quality. During the team's review and discussions with Program staff about a challenging amendment request for a different lixiviant, the team noted that Program staff carefully considered the complex technical issues related to that review and had taken a rational, performance-based approach in approving the request.

The team reviewed the licensing procedures that have been implemented by the Wyoming staff. The team observed that Wyoming uses a series of checklists to guide its reviews. The checklists are geared towards the nature of the reviews; different checklists are used for actions at conventional mills and ISR facilities. Wyoming staff also utilize NRC guidance documents in performing its reviews.

Wyoming uses a spreadsheet to track the progress of its reviews for licensing actions. The spreadsheet identifies the licensee, nature of the licensing action, coordinator for the review, date accepted, date(s) of request for more information related to the review, date of public notice (when required) and completion date.

c. Evaluation

The team determined that, during the review period, Wyoming met the performance indicator objectives listed in Section 3.4.a. Based on the criteria in MD 5.6, the team recommends that Wyoming's performance with respect to the indicator, Technical Quality of Licensing Actions, be found satisfactory.

d. MRB Chair's Determination

The final report will present the MRB Chair's determination regarding this indicator.

### 3.5 Technical Quality of Incident and Allegation Activities

The quality, thoroughness, and timeliness of response to incidents and allegations of safety concerns can have a direct bearing on public health, safety and security. An assessment of incident response and allegation investigation procedures, actual implementation of these procedures, internal and external coordination, timely incident reporting, and investigative and follow-up actions, are a significant indicator of the overall quality of the incident response and allegation programs.

#### a. Scope

The team used the guidance in State Agreements procedure SA-110, "Reviewing the Non-Common Performance Indicator: Uranium Recovery Program," and evaluated Wyoming's performance with respect to the following performance indicator objectives:

- Uranium recovery incident response, investigation, and allegation procedures are in place and followed.
- Response actions are appropriate, well-coordinated, and timely.
- On-site responses are performed when incidents have potential health, safety, or security significance.
- Appropriate follow-up actions are taken to ensure prompt compliance by licensees.
- Follow-up inspections are scheduled and completed, as necessary.
- Notifications are made to the NRC Headquarters Operations Center for incidents requiring a 24-hour or immediate notification to the Agreement State or the NRC.
- Incidents are reported to the NMED and closed when required information is obtained.
- Allegations are investigated in a prompt, appropriate manner.
- Concerned individuals are notified of investigation conclusions.
- Concerned individuals' identities are protected, as allowed by law.

#### b. Discussion

The Wyoming program did not have any reportable incidents and had one allegation during the review period. Wyoming has written procedures for the handling, review, analysis, response, and follow-up of incidents and allegations.

The team reviewed 14 event reports from uranium recovery licensees in the Department's spill database and determined that none of the events required reporting to the NRC. After the initial report is entered by the licensee into the Department's online database, the licensee provides the Program with a written report within a week that includes additional detail on the incident, its location for future decommissioning (if required), and corrective actions. The team confirmed that these events are reviewed when received and at the next inspection.

The team reviewed the one allegation received by the Program during the review period. The team determined that the Program took appropriate follow-up actions and appropriately acknowledged and closed out the allegation.

c. Evaluation

The team determined that, during the review period, Wyoming met the performance indicator objectives listed in Section 3.5.a. Based on the criteria in MD 5.6, the team recommends that Wyoming's performance with respect to the indicator, Technical Quality of Incident and Allegation Activities, be found satisfactory.

d. MRB Chair's Determination

The final report will present the MRB Chair's determination regarding this indicator.

#### 4.0 NON-COMMON PERFORMANCE INDICATOR

As noted in Section 3.0, the Wyoming program is limited to the regulatory oversight of uranium recovery facilities; therefore, only the non-common performance Legislation, Regulations, and Other Program Elements was reviewed.

##### 4.1 Legislation, Regulations, and Other Program Elements

State statutes should authorize the State to establish a program for the regulation of agreement material and provide authority for the assumption of regulatory responsibility under the State's agreement with the NRC. The statutes must authorize the State to promulgate regulatory requirements necessary to provide reasonable assurance of adequate protection of public health, safety, and security. The State must be authorized through its legal authority to license, inspect, and enforce legally binding requirements, such as regulations and licenses. The NRC regulations that should be adopted by an Agreement State for purposes of compatibility or health and safety should be adopted in a time frame so that the effective date of the State requirement is not later than 3 years after the effective date of the NRC's final rule. Other program elements that have been designated as necessary for maintenance of an adequate and compatible program, should be adopted and implemented by an Agreement State within 6 months following NRC designation. A Program Element Table indicating the Compatibility Categories for those program elements other than regulations can be found on the NMSS website/Regulation Toolbox at <https://scp.nrc.gov/regtoolbox.html>.

a. Scope

The team used the guidance in State Agreements procedure SA-107, "Reviewing the Non-Common Performance Indicator: Legislation, Regulations, and Other Program Elements," and evaluated Wyoming's performance with respect to the following performance indicator objectives. A complete list of regulation amendments can be found on the NRC website at the following address: <https://scp.nrc.gov/regtoolbox.html>.

- The Agreement State program does not create conflicts, duplications, gaps, or other conditions that jeopardize an orderly pattern in the regulation of radioactive materials under the Atomic Energy Act, as amended.
- Regulations adopted by the Agreement State for purposes of compatibility or health and safety were adopted no later than 3 years after the effective date of the NRC regulation.
- Other program elements, as defined in SA-200 that have been designated as necessary for maintenance of an adequate and compatible program, have been adopted and implemented within 6 months of NRC designation.
- The State statutes authorize the State to establish a program for the regulation of agreement material and provide authority for the assumption of regulatory responsibility under the agreement.
- The State is authorized through its legal authority to license, inspect, and enforce legally binding requirements such as regulations and licenses.
- Sunset requirements, if any, do not negatively impact the effectiveness of the State's regulations.

b. Discussion

Wyoming became an Agreement State on September 30, 2018. Wyoming's current effective statutory authority is contained in the Environmental Quality Act §§ 35-11-101 *et seq.* and the Administrative Procedure Act §§ 16-3-101 *et seq.* of the Wyoming Statutes. The Department is designated as the State's radiation control agency. One legislative amendment affecting the uranium recovery program was passed during the review period. This amendment clarified that only the federal government can approve the bifurcation of the property and the byproduct material prior to the termination of a license.

Wyoming's administrative rulemaking process takes approximately 12 months from drafting to finalizing a rule. The public, NRC, other agencies, and potentially impacted licensees and registrants are offered an opportunity to comment during the process. Comments are considered and incorporated, as appropriate, before the regulations are finalized and approved by the Environmental Quality Council and the Governor. The team noted that the State's rules and regulations are not subject to "sunset" laws.

During the review period, the NRC adopted four amendments to its regulations required for compatibility. None of these amendments applied to Wyoming's oversight of uranium mill facilities. Other program elements, as defined in SA-200, that have been designated as necessary for maintenance of an adequate and compatible program issued during the review period, did not apply to uranium mill facilities.

c. Evaluation

The team determined that, during the review period, Wyoming met the performance indicator objectives listed in Section 4.1.a. Based on the criteria in MD 5.6, the team recommends that Wyoming's performance with respect to the indicator, Legislation, Regulations, and Other Program Elements, be found satisfactory.

d. MRB Chair's Determination

The final report will present the MRB Chair's determination regarding this indicator.

5.0 SUMMARY

As noted in Sections 3.0 and 4.0 above, Wyoming's performance was found to be satisfactory for all performance indicators reviewed. The team did not make any recommendations.

Accordingly, the team recommends that Wyoming Agreement State Program be found adequate to protect public health and safety and compatible with the NRC's program. Based on the results of the current IMPEP review, the team recommends that the next full IMPEP review take place in approximately 4 years, with a periodic meeting in approximately 2 years.



## LIST OF APPENDICES

Appendix A           IMPEP Review Team Members

Appendix B           Inspection Accompaniments

## APPENDIX A

### IMPEP REVIEW TEAM MEMBERS

<b>Name</b>	<b>Areas of Responsibility</b>
Duncan White, NMSS	Team Leader Technical Quality of Incidents and Allegations Legislation, Regulations, and other Program Elements
Jackie Cook, Region IV	Technical Staffing and Training
Doug Mandeville, NMSS	Technical Quality of Licensing Actions
Kevin Seibert, Washington	Status of Uranium Recovery Inspection Program Technical Quality of Inspections Inspection Accompaniments

APPENDIX B

INSPECTION ACCOMPANIMENTS

The following inspection accompaniments were performed prior to the on-site IMPEP review:

Accompaniment No.: 1	License No.: SUA 1597
License Type: ISR	Priority: 1
Inspection Date: 10/01/19	Inspector: AT

Accompaniment No.: 2	License No.: SUA 1597
License Type: ISR	Priority: 1
Inspection Date: 10/01/19	Inspector: BO

Accompaniment No.: 3	License No.: SUA 1548
License Type: ISR	Priority: 1
Inspection Date: 10/02/19	Inspector: DA

Accompaniment No.: 4	License No.: SUA 1548
License Type: ISR	Priority: 1
Inspection Date: 10/02/19	Inspector: RB

Accompaniment No.: 5	License No.: SUA 442
License Type: 11e.(2) Byproduct Material Disposal	Priority: 1
Inspection Date: 10/03/19	Inspector: RS