

INTEGRATED MATERIALS PERFORMANCE EVALUATION PROGRAM
QUESTIONNAIRE

Wyoming Agreement State Program Reporting

Period: June 24-27, 2024

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.

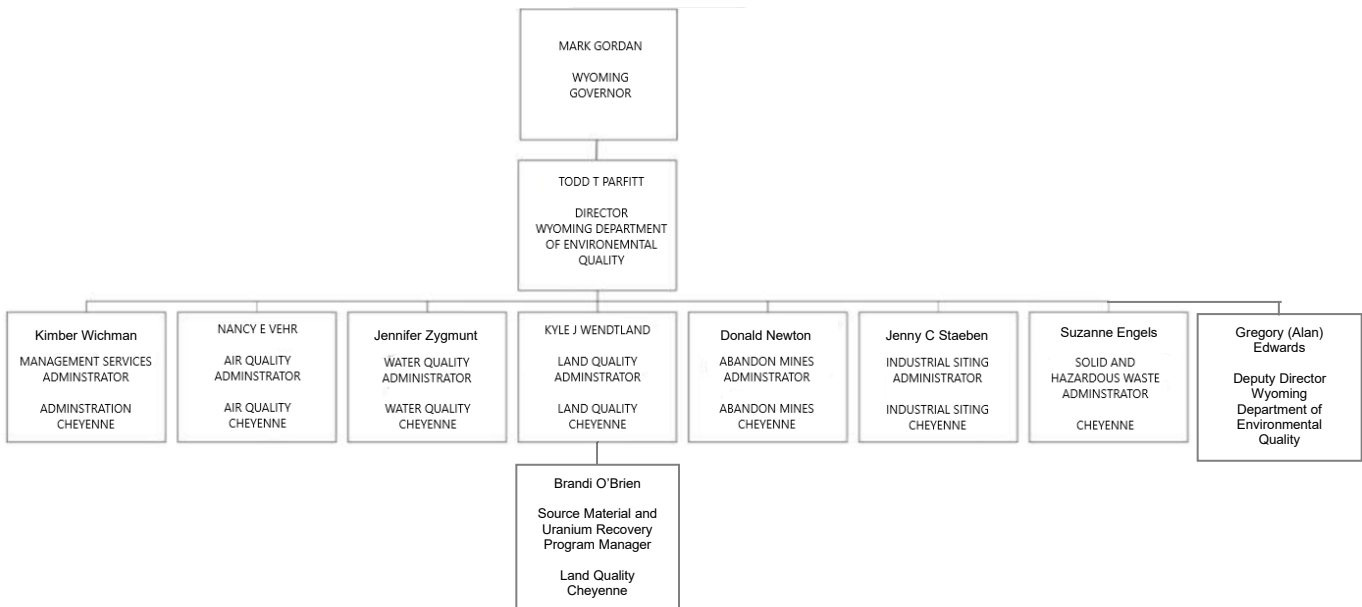
WDEQ/LQD RESPONSE: There were no recommendations as a result of Wyoming's last IMPEP.

B. COMMON PERFORMANCE INDICATORS

I. Technical Staffing and Training

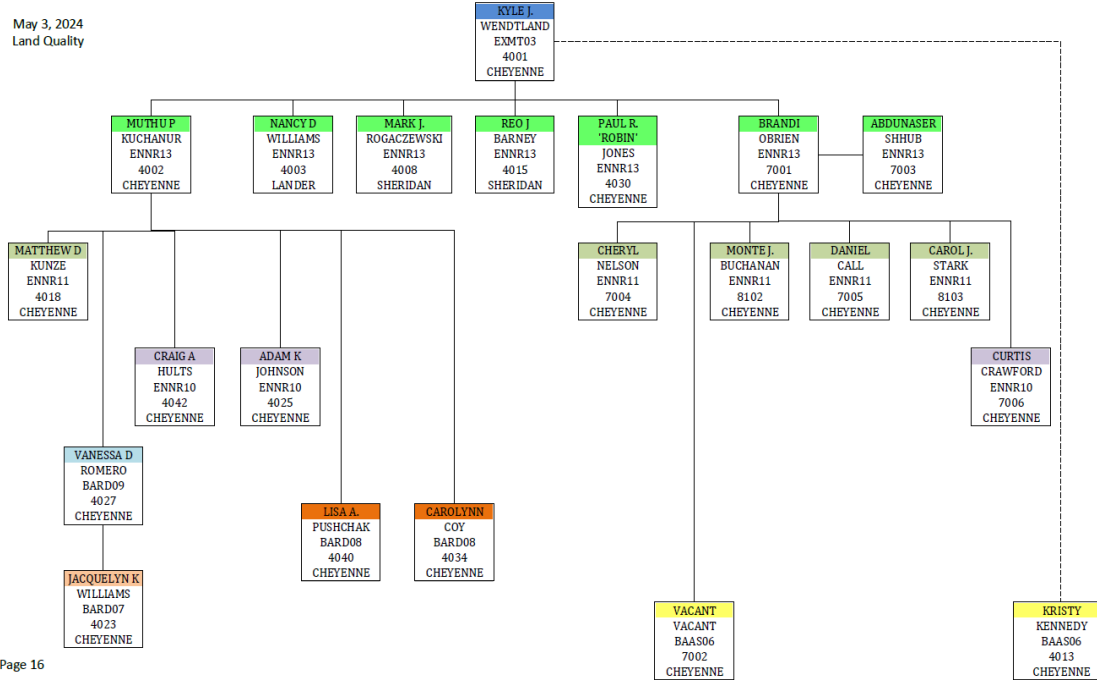
2. Please provide the following organization charts, including names and positions:

- (a) A chart showing positions from the Governor down to the Radiation Control Program Director;



(b) A chart showing positions of the radiation control program, including management; and

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(c) Equivalent charts for sealed source and device evaluation, low-level radioactive waste and uranium recovery programs, if applicable.

WDEQ/LQD RESPONSE: Wyoming only has a uranium recovery and source material program, as shown in 2(b).

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 by individual. Include the name, position, and, for Agreement States, the fraction of time spent in the following areas: administration, materials licensing and compliance, emergency response, low-level radioactive waste, uranium recovery, and other. If these regulatory responsibilities are divided between offices, the table should be consolidated to include all personnel contributing to the radioactive materials program.

¹Estimated burden per response to comply with this voluntary collection request: 53 hours. Forward comments regarding burden estimate to the FOIA, Library, and Information Collections Branch (T-6 A10M), U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001, or by e mail to Infocollects.Resource@nrc.gov, and to the OMB reviewer at: OMB Office of Information and Regulatory Affairs (3150 0183), Attn: Desk Officer for the Nuclear Regulatory Commission, 725 17th Street, NW Washington, DC 20503. The NRC may not conduct or sponsor, and a person is not required to respond to, a collection of information unless the document requesting or requiring the collection displays a currently valid OMB control number.

If consultants were used to carry out the program's radioactive materials responsibilities, include their efforts. The table heading should be:

Name Position Area of Effort FTE%

Table 1. Area of Effort

Name	Position	Area of Effort (%)			FTE**%
		Admin/ Oversite	Program Representation	Uranium Program (Inspection/Licensing)	
Kyle Wendtland*	LQD Administrator	25%			25
Brandi O'Brien	Program Manager	40%	20%	40%	100
AbduNaser Shhub	Sr. Health Physicist			100%	100
Cherrie Nelson	Health Physicist			100%	100
Curtis Crawford	Geologist			100%	100
Daniel Call	Hydrologist/Geochemist			100%	100
3 LQD (5112 hrs.)	Multiple Disciplines			100%	100
Totals		0.4 FTE (682 hrs.)	0.2 FTE (341 hrs.)	7.4 FTE (12,610 hrs.)	

* LQD Administrator time not billed to the LQD URP

** WDEQ determined staffing needs based upon 1 FTE = 1704 hours per employee, per year

Table 2: Hours per FTE

Staff Hours/Year= 52 Weeks x 5 days/week x 8 hours/day = 2080 hours.	
Description of Leave	Hours
10 Holidays	80
15 vacation days	120
10 days of training	80
12 sick days	96
Hours a Year per FTE	1704

4. Please provide a listing of all new professional personnel hired into your radioactive materials program since the last review, and if possible, who they are replacing if a recently vacated position is being filled (please indicate how long the position remained vacant). Please 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.

WDEQ/LQD RESPONSE:

- Brandi O'Brien – Source Material and Uranium Recovery Program Manager
 - Date of Hire: Interim December 24, 2021, officially February 2023
 - Employee Replaced: David Adams
 - Length of vacancy: 0 days (acted as interim program manager until officially hired)
 - Education: B.S. Nuclear Engineering
 - Experience:
 - URP License reviewer and Inspector (8.5 years)
 - Air Quality inspector/permit writer (4 years)
- Cherrie Nelson – URP Health Physicist
 - Date of Hire: March 21, 2022
 - Employee Replaced: Brandi O'Brien, promoted February 2023
 - Length of vacancy: 48 days
 - Education: M.S. Toxicology, B.S Biology
 - Experience:
 - URP License reviewer and Inspector (2.5 years)

- WDEQ Water Quality Division and Solid & Hazardous Waste Division and Environmental Private Consultancy - toxicologist, compliance coordinator, and project manager (22 years)
- Dr. AbduNaser Shhub – URP Senior Health Physicist
 - Date of Hire: March 1, 2023
 - Employee Replaced: Dr. Omar Nusair (left May 13, 2022)
 - Length of vacancy: 292 days
 - Education: PhD and MSc in Nuclear Science and Engineering, BSc in Nuclear Engineering
 - Experience:
 - Texas Commission on Environmental Quality, Radioactive Materials Section Health Physicist (1 year)
 - Saudi Aramco
 - Environmental Scientist/RSO (5.5 years)
 - Organizational Performance Advisor/ Business Systems Analyst (12 years)
 - Professor/instructor (3 years)
 - Trainer/Field Engineer (2 years)
 - Research Nuclear Engineer (2.5 years)
- Daniel Call – URP Hydrogeologist/Geochemist
 - Date of Hire: August 17, 2023
 - Employee Replaced: Reid Brown (left April 29, 2023)
 - Length of vacancy: 110 days
 - Education: Bachelor's degree in psychology, master's degree in physical science (Earth Science), master's certificate in geospatial analysis
 - Experience:
 - Field Geologist (7 years)
 - GIS Tech (2 years)
- Curtis Crawford – URP Geologist
 - Date of Hire: December 1, 2023
 - Employee Replaced: Andrew Frazier (left March 20, 2023)
 - Length of vacancy: 256 days
 - Education: B.S. Environmental Science
 - Experience: WDEQ Groundwater, Underground Injection Control - Inspector/ Permit Writer/ Enforcement Coordinator (1.75 years)
- Monte Buchanan – Source Material Program Health Physicist
 - Date of Hire: July 1, 2023
 - Employee Replaced: N/A (new position)
 - Length of vacancy: N/A
 - Education: B.S. in Geophysics
 - Experience:
 - WDEQ/LQD Natural Resource Analyst (16.5 years)
 - Mountain Cement, Co.
 - Utility Operator (4.5 years)
 - Quarry Technician (2 years)
 - Maxim Technologies, Inc. Engineering Technician III (1 year)
- Carol Stark – Source Material Program Health Physicist
 - Date of Hire: August 3, 2023
 - Employee Replaced: N/A (new position)
 - Length of vacancy: N/A
 - Education: Bachelor's Degree in Environmental Conservation,
 - Experience:
 - WDEQ Solid and Hazardous Waste Division,
 - Voluntary Remediation Project Manager (6.5 years)
 - Project Manager (7.5 years)
 - Manufacturing-Works, Sustainable Project Engineer (10 years)

- Fluor Daniel, Naval Petroleum and Oil Shale Reserves, Environmental Coordinator (6 years)
 - David Adams – Previous Uranium Recovery Program Manager
 - Date of Hire: November 3, 2020
 - Date Left: December 23, 2021
 - Employee Replaced: Ryan Schierman (left September 3, 2020)
 - Length of vacancy: 61 days
 - Education: Bachelor's Degree in Environmental Health and Masters Degree in Health Physics
 - Experience:
 - Environment Restoration Group Inc., Project Manager/Sr. Health Physicist/HSO (1 year)
 - URP Senior Health Physicist (3.5 years)
 - ARCADIS, Health Physicist (3 years)
 - Andrew Frazier – Previous URP Geologist
 - Date of Hire: March 16, 2022
 - Date Left: March 20, 2023
 - Employee Replaced: Alan Thompson (retired August 3, 2021)
 - Length of vacancy: 225 days
 - Education: Bachelor's Degree in Geology
 - Experience:
 - Exploration and Mine Development Geologist (13 years)
 - Geologist (6 years)
 - Dr. Omar Nusair – Previous Senior Health Physicist
 - Date of Hire: May 4, 2020
 - Date Left: May 13, 2022
 - Employee Replaced: David Adams (left Jan 10, 2020)
 - Length of vacancy: 115 days
 - Education: Bachelor's Degree in General Physics, Master's Degree in Nuclear Reactor Physics and Engineering, Master's Degree in Applied Nuclear Physics, and Doctorate in Experimental Nuclear Physics
 - Experience:
 - Post-doctoral researcher (3 years)
 - Jordan Research and Training Reactor, Head of Reactor Utilization Department (1.5 years)

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

6.

WDEQ/LQD RESPONSE:

- Daniel Call –
 - Classes remaining:
 - F-104 Health Physics for Uranium Recovery
 - G-109 Licensing Practices and Procedures
 - G-205 Root Cause/Incident Investigation Workshop
 - Other requirements: self-study
 - Estimated qualification date: December 2024
- Curtis Crawford –
 - Classes remaining:
 - G-108 Inspection Procedures
 - F-104 Health Physics for Uranium Recovery
 - G-205 Root Cause/Incident Investigation Workshop
 - H-122 Lab - Health Physics Lab
 - G-109 Licensing Practices and Procedures

- Other requirements: self-study
- Estimated qualification date: April 2025
- Monte Buchanan (Source Material Program) –
 - Classes remaining:
 - G-108 Inspection Procedures
 - F-104 Health Physics for Uranium Recovery
 - G-205 Root Cause/Incident Investigation Workshop
 - Other requirements: self-study
 - Estimated qualification date: December 2024
- Carol Stark (Source Material Program) –
 - Classes remaining:
 - H-122S Fundamentals of Health Physics (Started, need to Finish)
 - H-122L Fundamentals of Health Physics Lab
 - G-108 Inspection Procedures
 - F-104 Health Physics for Uranium Recovery
 - G-109 Licensing Practices and Procedures
 - G-205 Root Cause/Incident Investigation Workshop
 - Other requirements: self-study
 - Estimated qualification date: April 2025

7. Please provide copies of the Program's training procedures.

WDEQ/LQD RESPONSE: Please see attachment.

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

WDEQ/LQD RESPONSE: Wyoming has updated the qualification journal to reflect the changes in NRC-class names and numbers. (Memo dated December 1, 2023)

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

WDEQ/LQD RESPONSE:

- Ryan Schierman – left September 3, 2020 (URP Manager)
- David Adams – left December 26, 2021 (URP Manager)
- Dr. Omar Nusair – left May 13, 2022 (Sr. Health Physicist)
- Andrew Frazier – left March 20, 2023 (Geologist)
- Alan Thompson – retired August 3, 2021 (Geologist)

10. 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.

WDEQ/LQD RESPONSE:

- Position: Uranium Recovery Program Manager
 - Vacated: September 3, 2020
 - Filled: November 3, 2020
 - Length of Vacancy: 61 days
 - Efforts to fill vacancy:
 - Job posed on State Website
- Position: URP Geologist
 - Vacated: August 3, 2021
 - Filled: March 16, 2022
 - Length of Vacancy: 225 days

- Efforts to fill vacancy:
 - Job posed on State Website
- Position: Uranium Recovery Program Manager
 - Vacated: December 26, 2021
 - Filled: February 1, 2022
 - Length of Vacancy: 37 days
 - Efforts to fill vacancy:
 - Job posed on State Website
- Position: URP Health Physicist
 - Vacated: February 1, 2022
 - Filled: March 21, 2022
 - Length of Vacancy: 48 days
 - Efforts to fill vacancy:
 - Job posed on State Website
- Position: URP Senior Health Physicist
 - Vacated: May 13, 2022
 - Filled: March 1, 2023
 - Length of Vacancy: 292 days
 - Efforts to fill vacancy:
 - Job posed on State Website
 - Position shared through OAS emails
 - Posted in Technical Journal
 - Contacted Universities with Health Physics Programs
 - Employee outreach
- Position: URP Geologist
 - Vacated: March 20, 2023
 - Filled: December 1, 2023
 - Length of Vacancy: 256 days
 - Efforts to fill vacancy:
 - Job posed on State Website

11. For Agreement States, does your program have an oversight board or committee which provides direction to the program and is composed of licensees and/or members of the public? If so, please describe the procedures used to avoid any potential conflict of interest.

WDEQ/LQD RESPONSE: The Environmental Quality Council (EQC) was created to serve as an independent entity that reviews matters concerning the prevention, reduction, elimination of pollution, and preservation of Wyoming's water, air, and land quality. The power and duties of the Council are to (1) Promulgate rules and regulations necessary for the administration of the Environmental Quality Act (EQA) 2) Conduct hearings in any case contesting the administration or enforcement of any law, rule, regulation, standard, or order issued or administered by the Department, and (4) Conduct hearings in any case contesting the administration or enforcement of any law, rule, regulation, standard, or order issued or administered by the Department, and (4) Conduct hearings in any case contesting the grant, denial, suspension, revocation, or renewal of any permit, license, certification, or variance authorized or required by the EQA.

Per W.S. 35-11-111 The EQC is made up of 7 members appointed by the Governor with not more than 75% of the members of the same party. At all times there shall be at least one member from the minerals industry and one member from agriculture. Any member receiving more than ten percent of his income from any permit application shall not act on a permit application from that applicant.

Additionally, the Council is governed by State regulations which address conflict of interest.

In addition to the EQC, there is an advisory board for the LQD. The Land Quality Advisory Board consists of 5 members appointed by the Governor. The board consists of one member representing industry, one member representing agriculture, one member representing political subdivision, and 2 members representing the public. The Advisory Board is also subject to State Regulation addressing conflict of interests.

II. Status of Materials Inspection Program

11. Please identify individual licensees or categories of licensees the State is inspecting less frequently than called for in NRC's Inspection Manual Chapter (IMC) 2800 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.

WDEQ/LQD RESPONSE: SUA 1596 Uranium Moore Ranch and SUA 1602 AUC Reno Creek. These sites have been issued a source material license however, no construction activities have commenced. These facilities are not inspected by the Uranium Recovery Program until commencement of construction begins. These facilities may be inspected on a case-by-case basis due to enforcement, allegation, incident, or license issues that may arise prior to the pre-operational inspection at the facility. This is consistent with NRC Region IV decision regarding these sites. (ML18278A285 and ML1827A105).

12. 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.

WDEQ/LQD RESPONSE: No initial inspections were performed during the review period. The following routine and unannounced inspections were performed during the review period:

- March 2020 through December 31, 2020: 11
- 2021: 12
- 2022: 6
- 2023: 8
- 2024 (through June 10): 8

13. Please submit a table, or a spreadsheet, 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) Program Codes
- (4) Priority (IMC 2800)
- (5) Last inspection date or license issuance date, if initial inspection
- (6) Date Due

- (7) Date Performed
- (8) Amount of Time Overdue
- (9) Date inspection findings issued

WDEQ/LQD RESPONSE: See table below. Please note that the inspection frequency is +/- 2 months for the internal goal and +/- per IMC 2801. For ISR facilities, the internal goal is 6 months +/-, or 1 year +/- (under certain circumstances). For Title II sites, it is 2 years +/-.

License Number	Site Name	Previous Inspection	Inspection Date	Inspection Report Sent	Days Between Inspections	Days over (+/- 2 month internal goal)	Days over (+/- 3 month goal)
WYSUA-1548	Cameco Smith Highland	10/2/19	8/19/20	10/6/20	322	82	52
SUA1341	Uranium One	11/14/19	8/26/20	10/7/20	286	46	16
SUA1350	Kennecott Mill	8/29/18	10/21/20	11/24/20	784	4	
WYSUA1601	Strata Energy Inc. Ross	12/3/19	12/3/20	1/26/21	366	126	96
SUA-1597	Nichols Ranch	9/1/20	5/4/21	5/24/21	245	5	
WYSUA-1598	UR Energy Lost Creek	8/3/20	5/26/21	6/25/21	296	56	26
SUA1341	Uranium One	8/6/20	6/28/21	7/27/21	326	86	56
SUA-0672	Orano LuckyMc	8/28/18	7/22/21	8/11/21	1059	279	249
WYSUA-1548	Cameco Smith Highland / NB	8/19/20	9/2/21	10/4/21	379	139	109
WYSUA1601	Strata Energy Inc. Ross	6/29/22	3/23/23	4/28/23	267	27	
WYSUA-1598	UR Energy Lost Creek	5/9/22	5/24/23	6/28/24	380	140	110
SUA1139	Exxon Highland	9/10/20	10/24/23		1139	359	329
WYSUA1341	Uranium Energy Corporation	11/7/22	1/23/24		442	22	
SUA1310	Anadarko Bear Creek	7/14/20	5/28/24		1414	634	604
SUA-442	Pathfinder Shirley Basin	10/5/21	5/29/24		967	187	157
SUA-0672	Orano LuckyMc	7/22/21	5/30/24		1043	263	233
SUA648	Umetco	7/15/20	6/5/24		1421	641	611

14. Please submit a table or spreadsheet 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.

WDEQ/LQD RESPONSE: No inspections are currently overdue.

15. 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.

WDEQ/LQD RESPONSE: No reciprocity inspections have been performed to date.

16. Please provide copies of the Program's reciprocity procedure.

WDEQ/LQD RESPONSE: Wyoming does not have a reciprocity procedure.

III. Technical Quality of Inspections

17. Please provide copies of the Program's inspection procedure(s), or a confirmation that Program is using the NRC's inspection procedures.

WDEQ/LQD RESPONSE: The following URP inspection procedures are attached:

- URP-01 Uranium Recovery Inspection Procedures (In-Situ)
- URP-02 Uranium Mill and 11e.(2) Byproduct Material Disposal Site and Facility Inspection Program
- URP-03 Uranium Mill, In-Situ, and 11e.(2) Byproduct Material Disposal Decommissioning Inspections

- URP-04 Technical Quality of Inspections
- URP-05 Instrumentation Field Function Checks and Use

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

WDEQ/LQD RESPONSE: No updates were made to the written inspection procedures during the reporting period.

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

<u>Inspector</u>	<u>Supervisor</u>	<u>License Category</u>	<u>Date</u>
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WDEQ/LQD RESPONSE: This table will be available for the in-person IMPEP review.

20. 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?

WDEQ/LQD RESPONSE: The Wyoming URP does not have a laboratory. All instrumentation being used is currently in calibration. No updates have been made to the instrumentation or methods of calibration. There were sufficient instruments available throughout the review period.

IV. Technical Quality of Licensing Actions

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

WDEQ/LQD RESPONSE: 14 Source Material Licenses

License Number	Site Name	Notes
WYSUA 56	Western Nuclear Inc Split Rock	License terminated and site transferred to DOE
WYSUA 442	Pathfinder Shirley Basin	Active Disposal
WYSUA 648	Umetco Gas Hills	Decommissioning
SUA 672	Orano Lucky Mc Gas Hills	Decommissioning
SUA 1139	Exxon Mobil Highland	Decommissioning
WYSUA 1310	Anadarko Bear Creek	Decommissioning
WYSUA 1350	Kennecott Sweetwater Mill	Decommissioning
WYSUA 1341	UEC Uranium Corp. Willow Creek	Active
WYSUA 1548	Cameco Power Resources Smith Ranch	Active
SUA 1597	Energy Fuels Nichols Ranch	Active
WYSUA 1598	UR Energy Lost Creek	Active
WYSUA 1601	Strata Ross	Active
WYSUA 1596	UEC Wyoming Corp. Moore Ranch	License Only
WYSUA 1602	AUC Reno Creek	License Only
WYSUA-2010	Pathfinder Shirley Basin ISR	License Only

22. Please provide a list of licensing actions completed during the review period, including program code, license reviewer, and license type

WDEQ/LQD RESPONSE: See the table below.

License	TFN	License Reviewer(s)	Date Approved	Description
WYSUA-1601	7/3/002	Brandi O'Brien	4/15/20	Strata Interim Restoration Report for Stage III*
WYSUA 442	7/3/008	Alan Thompson	4/23/20	Pathfinder Shirley Basin Request to allow grazing on Tailings
WYSUA 1350	6/3/346	Reid Brown	5/11/20	Kennecott Groundwater Plume Report
WYSUA-1601	7/6/006	Alan Thompson	5/15/20	Strata Revision to the Mine Unit 1 Wellfield Data Package
WYSUA-0648	7 2/010		6/22/20	Umetco's Monitoring Well Installation Plan to further expand the well network at Umetco's Gas Hills former uranium mill site
WYSUA 442	7/5/035	Alan Thompson	12/16/20	Pathfinder Shirley Basin North License Amendment
WYSUA-1548	06/4/343	David Adams	1/12/21	Cameco Smith Ranch Mine Unit 1 ACL*
WYSUA-1341	5/2/022	Reid Brown	1/12/21	Uranium One Christensen Ranch MU 2-6 Restoration*
WYSUA-1601	7/6/035	Omar Nusair	1/20/21	Strata request to use the release limits contained in ANSI Standard ANSI/HPS 13.12 for release of materials with contamination associated with low pH lixiviant*
WYSUA-1341	6/1/250	David Adams	1/20/21	UraniumOne Soils Decommissioning MU1-9*
WYSUA-1341	6/1/250	David Adams	1/27/21	Uranium One Irigaray Mine Unit 1-9 Final Status Survey as Amended*
WYSUA-1598	6/3/308	Brandi O'Brien	3/4/21	Lost Creek KM Horizon and LC East Expansion License Review*
WYSUA 056	6/4/344	David Adams	3/29/21	Western Nuclear Split Rock Completion Review Report*
WYSUA-2010	6/1/335	Alan Thompson	5/4/21	Pathfinder Shirley Basin ISR application*
WYSUA 1350	7/4/062	Reid Brown	6/28/21	Kennecott Corrective Action Plan Revision
WYSUA-1341	7/2/082	David Adams	9/27/21	UraniumOne Soils Decommissioning MU1-9

				Addendum - Building Footprints*
WYSUA 1350	7/6/100	David Adams	12/10/2021	Change of Control Request - Willow Creek*
WYSUA-1596	7/1/101	David Adams	12/10/2021	Change of Control Request - Moore Ranch*
SUA 1597	7/5/112	Omar Nusair	3/23/2022	NR requests for alternate decommissioning schedule for PA#1 and 2
WYSUA-1601	7/4/063	Brandi O'Brien and Reid Brown	4/25/22	Strata Oxidant*
WYSUA-1596	7/3/112	Reid Brown	6/17/2022	Moore Ranch Name Change
WYSUA-1341	7/4/112	Reid Brown	9/8/2022	Willow Creek Name Change
WYSUA-1596	7/3/037	Reid Brown and David Adams	10/7/22	Uranium One Moore Ranch License Renewal (UEC Wyoming Corp)*
WYSUA-1601	7/1/105	Omar Nusair	10/14/2022	Strata LC 9.7 and 12.1-12.13 Regarding Qualified Designee
WYSUA-1601	7/2/107	Brandi O'Brien	10/14/2022	Strata LC 10.8 use of Ponds 1 and 2 for retention of liquid source material and associated solids*
WYSUA-1601	7/6/118	Brandi O'Brien	10/14/2022	Strata, Amend LC 12.14(B) to reflect the stochastic DAC for thorium 230
WYSUA-0056	7/5/118	Brandi O'Brien and Cherrie Nelson	10/28/2022	WNI Split Rock, modification to groundwater compliance monitoring program
WYSUA-1548	7/2/156	Reid Brown	2/15/2023	Cameco Amendment to ALARA Submittal Date
WYSUA-1602	7/5/082	Omar Nusair	7/24/23	AUC Reno Creek License Amendment*
WYSUA-1341	7/4/106	Reid Brown	10/6/2023	Completion Review Report Irigaray Mine Units 1-9*
WYSUA-1341	7/4/106	Abdu Naser Shhub	10/6/2023	Partial Site Release (CRR MU1-9)*
WYSUA 1350	7/6/071	Omar Nusair, Naser Shhub and Brandi O'Brien	5/10/24	Kennecott Public Dose Amendment

23. Please indicate whether the licensing records are stored electronically, or in paper files, or in a combination of both.

WDEQ/LQD RESPONSE: Licensing records are stored electronically.

24. 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.

WDEQ/LQD RESPONSE: Please see the table in Question 22, descriptions with a * indicate an action that meets the above criteria.

25. Please provide copy of the Program’s licensing procedure(s) or a confirmation that the Program is using NRC’s NUREG-1556.

WDEQ/LQD RESPONSE: Please see attachment.

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

WDEQ/LQD RESPONSE: Due to Covid, licensees requested and were granted different types of exemptions on sampling frequencies, or other items as necessary. Wyoming will have a list of these exemptions available for the IMPEP team.

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

WDEQ/LQD RESPONSE: The URP wrote a public notice policy document, clarifying which licensing actions need to go to public notice.

28. Please indicate which revision(s) of the Risk-Significant Radioactive Materials Checklist and Pre-Licensing Guidance were used by the Program during this review period.

WDEQ/LQD RESPONSE: These were not used.

29. 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.

WDEQ/LQD RESPONSE: Below is a table showing the renewal applications that have been pending for one year or more. These reviews have been delayed due to competing assignments and priorities, as well as staff turnover. The Nichols Ranch and Lost Creek renewals have made significant progress towards completion recently. The URP plans to utilize regular meetings with licensees to ensure that applications continue to move forward.

License Number	Site Name	Renewal Application Date
WYSUA 1341	UEC Uranium Corp. Willow Creek	2/3/2023
SUA 1597	Energy Fuels Nichols Ranch	6/18/2021
WYSUA 1598	UR Energy Lost Creek	7/31/2021

V. Technical Quality of Incident and Allegation Activities

30. 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). The list should be in the following format:

Licensee Name License # Date of Incident/Report Type of Incident

WDEQ/LQD RESPONSE: As of October 1, 2018, the LQD has had no incidents that require reporting as detailed SA 300 Reporting Material Events or Subpart M of 10 CFR 20. The LQD/URP does track excursions and spills at the facilities as events, however these do not meet the NRC criteria for reporting.

31. Provide a list of allegations that were closed during the review period and any allegations that remain open.

WDEQ/LQD RESPONSE:

License	Incident (I) / Allegation (A)	Date Opened/ Reported to URP	Date Closed
WYSUA-1548	(I) Falsification of scan-out time	9/28/2021	9/23/2022
WYSUA-1548	(A) Allegor claiming they suffered health impacts that required medical intervention	5/16/2022	9/23/2022
N/A	(A) Supposed mill tailings being sold	12/6/2024	12/12/2023
WYSUA-1598	(A) Several compliance allegations	3/8/2024	4/23/2024

32. Provide copies of the Program’s Incident and Allegation procedures.

WDEQ/LQD RESPONSE: Please see attachment.

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

WDEQ/LQD RESPONSE: No changes were made.

C. NON-COMMON PERFORMANCE INDICATORS

I. Legislation, Regulations, and Other Program Elements

34. Please list all currently effective legislation that affects the radiation control program. Denote any legislation that was enacted or amended during the review period.

WDEQ/LQD RESPONSE: The governing statutes for the URP are contained in the Wyoming Environmental Quality Act, Wyo. Stat. §§ 35-11-2001 through -2005. Changes to these statutes were made in 2023 with the passing of House Bill HB0061, which added language allowing Wyoming to pursue amending their Agreement with the NRC to include “Source Material Associated with Milling.” Wyoming is currently in the process of amending the agreement.

35. Are your regulations subject to a "Sunset" or equivalent law? If so, explain and include the next expiration date for your regulations.

WDEQ/LQD RESPONSE: No.

36. Please review and verify that the information in the enclosed State Regulation Status (SRS) sheet is correct and provide a status of any outstanding comments. For those regulations that have not been adopted by the State, explain why they were not adopted, and discuss actions being taken to adopt them. If legally binding requirements were used in lieu of regulations and they have not been reviewed by NRC for compatibility, please describe their use.

WDEQ/LQD RESPONSE: Most of the rule changes do not affect the URP. The RATS-IDs have not been submitted recently due to competing priorities.

37. If you have not adopted all amendments within three years from the date of NRC rule promulgation, briefly describe your State's procedures for amending regulations in order to maintain compatibility with the NRC, showing the normal length of time anticipated to complete each step.

WDEQ/LQD RESPONSE: The process for the URP to amend regulations is as follows:

- The rules are presented to and voted on by the Land Quality Advisory Board (Public notice at this stage) - 30 days public notice prior to each quarterly meeting,
- The rules are presented to and voted on by the Environmental Quality Council (Public notice at this stage 45 days prior)
- Governor's office and Legislative Services Office review of Statement of Principal Reasons and Proposed Rules, 15 days (10 business)
- Final adoption review and signed by the Governor (up to 75 days)
- Upload to the Secretary of State's Office and becomes a State Rule

D. OTHER

38. Is there anything else the IMPEP team should be made aware of while preparing for the IMPEP review?

WDEQ/LQD RESPONSE: Dr. AdbuNaser Shhub will be out of the office the week of the IMPEP. If the IMPEP team has any questions for him, please reach out either before or after that week.

39. 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

WDEQ/LQD RESPONSE: All responses in Section A apply specifically to the Uranium Recovery Program.

MATERIALS REQUESTED TO BE AVAILABLE FOR THE ON-SITE PORTION OF AN IMPEP REVIEW

Please have the following information available for use by the IMPEP review team when they arrive at your office:

- List of open license cases, with date of original request, and dates of follow-up actions.
- List of licenses terminated during review period.
- Copy of current log or other document used to track licensing actions.
- List of all licensing actions completed during the review period (sorted by license reviewer, if possible).
- Copy of current log or other document used to track inspections.
- List of all inspections completed during the review period (sorted by inspector, if possible).
- List of inspection frequencies by license type.
- List of all allegations occurring during the review period. Show whether the allegation is open or closed and whether it was referred by NRC.
- List of all licenses that your agency has imposed additional security requirements upon.

ALSO, PLEASE HAVE THE FOLLOWING DOCUMENTS AVAILABLE:

- All State regulations
- Statutes affecting the regulatory authority of the State program
- Standard license conditions
- Technical procedures for licensing, model licenses, review guides
- SS&D review procedures, guides, and standards
- Instrument calibration records
- Inspection procedures and guides
- Inspection report forms
- Documented training plan, if applicable
- Records of results of supervisory accompaniments of inspectors
- Emergency plan and communications list
- Procedures for investigating allegations
- Procedures for investigating incidents
- Enforcement procedures, including procedures for escalated enforcement, severity levels, civil penalties (as applicable)
- Job descriptions

STATE REGULATION STATUS

State: Wyoming
23-62

Tracking Ticket Number:

Date:

[Amendment(s) reviewed identified by a * at the beginning of the equivalent NRC requirement.]

RATS ID	NRC Chronology Identification	Date Due for State Adoption	Incoming Letter	Outgoing Package	Notes
NA	Wyoming Enabling Legislation Wyoming House Bill HB0027	NA	Proposed ML15225A439 Revised Proposed ML15324A391 Revised Proposed ML17319A925 Revised Proposed ML19004A444 Final Agreement ML18267A261 09/30/2018	Comments 9/28/2015 ML15225A433 Comments 09/26/2016 ML15324A388 Comments 02/28/2018 ML18032A380 No Comments 01/23/2019 ML19004A436	
NA	Wyoming DEQ Regulations to 10 CFR Part 20 Chapter 1: General Provisions Chapter 3: Radiation Protection Standards	NA	Proposed ML16014A133 Revised Proposed ML16097A348 Final ML17319A925	Comments 03/15/2016 ML16014A131 Comments 10/03/2016 ML16097A339 No Comments 02/18/2018 ML18032A380	

RATS ID	NRC Chronology Identification	Date Due for State Adoption	Incoming Letter	Outgoing Package	Notes
NA	Wyoming DEQ Regulations to 10 CFR Parts 19 and 71 Chapter 1: General Provisions Chapter 5: Notice, Instructions and Reports to Workers Chapter 9: Transportation of Licensed Material Chapter 10: Risk-Informed and Performance Based Licensing and Inspection	NA	Proposed ML16095A093 Final ML17319A925	Comments 07/25/2016 ML16095A091 No Comments 02/18/2018 ML18032A380	
NA	Wyoming DEQ Regulations to 10 CFR Parts 40 and 150 Chapter 1: General Provisions Chapter 4: Licensing Requirements for Source and Byproduct Material Chapter 6: Financial Assurance Chapter 10: General Licenses	NA	Proposed ML16194A168 Final ML17319A925	Comments 10/13/2016 ML16194A048 No Comments 02/18/2018 ML18032A380	
2018-2	Miscellaneous Corrections – Organizational Changes 10 CFR Parts 37, 40, 70 and 71	12/21/2021	ML19030B773	ML19030B770 01/30/2019	This rulemaking does not contain provisions applicable to Wyoming's program.
2018-3	Miscellaneous Corrections Parts 1, 2, 34, 37, 50, 71, 73, and 140	07/30/2022			
2019-1	Miscellaneous Corrections Parts 2, 21, 37, 50, 52, 73, and 110	12/18/2022			
2019-2	Organizational Changes and Conforming Amendments Parts 1, 2, 37, 40, 50, 51, 52, 55, 71, 72, 73, 74, 100, 140, and 150	12/30/2022			
2020-1	Individual Monitoring Devices 10 CFR Parts 34, 36, and 39	06/16/2023			
2020-2	Social Security Number Fraud Prevention 10 CFR Parts 9 and 35	08/17/2023			

RATS ID	NRC Chronology Identification	Date Due for State Adoption	Incoming Letter	Outgoing Package	Notes
2020-3	Miscellaneous Corrections 10 CFR Parts 1, 2, 19, 20, 21, 30, 34, 35, 40, 50, 51, 52, 60, 61, 62, 63, 70, 71, 72, 73, 74, 75, 76, 110, and 140	11/16/2023			
2021-1	Miscellaneous Corrections 10 CFR Parts 2, 11, 20, 25, 32, 35, 37, 50, 52,55, 70, 72, 73, 95, and 110	09/08/2024			
2021-2	Miscellaneous Corrections 10 CFR Parts 9, 37, 40, 50, 51, 52, 55, 71, 73, and 110	12/30/2024			
2022-1	Miscellaneous Corrections 10 CFR 1, 2, 20, 30, 40, 50, 55, 70, 73, and 170	none			Provisions are not required for compatibility.
2022-2	Miscellaneous Corrections 10 CFR Parts 20, 35, 50, 51, 52, 72, 73, 110, and 150	none			Provisions are not required for compatibility.
2023-1	Miscellaneous Corrections 10 CFR PARTS 1, 2, 26, 32, 40, 50, 51, 52, 72, and 73	09/25/2026			
NA	Legislation, Articles 15 and 21	NA	ML21194A144	Comments 08/31/2021 ML21194A077	
NA	Proposed Legislation	NA	ML22364A006	No Comments 01/04/2023 ML22364A003	
NA	Final Legislation	NA	ML23059A393	No Comments 03/03/2023 ML23059A385	

RATS ID	NRC Chronology Identification	Date Due for State Adoption	Incoming Letter	Outgoing Package	Notes
NA	Wyoming DEQ Regulations to 10 CFR Parts 19 and 20 Chapter 1: General Provisions Chapter 3: Radiation Protection Standards Chapter 5: Notice, Instructions and Reports to Workers	NA	Proposed ML23290A062	Comments 01/03/2024 ML23285A135	
NA	Wyoming DEQ Regulations to Part 71 and Misc Chapter 1: General Provisions Chapter 6: Financial Assurance Chapter 9: Transportation of Licensed Material	NA	Proposed ML23355A017	Comments 02/29/2024 ML23355A015	