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January 5, 2026

Document Control Desk
U.S. Nuclear Regulatory Commission
Washington, DC 20555–0001

Ms. Melanie Wong, Project Manager
Project Manager, Materials Decommissioning Branch
Decommissioning, Uranium Recovery & Waste Programs
Office of Nuclear Materials Safety and Safeguards
U.S. Nuclear Regulatory Commission
MS T-5A10, 11545 Rockville Pike
Rockville, MD 20852

RE: **Homestake Mining Company of California – Grants Reclamation Project – Request for Amendment to License No. SUA-1471 to permanently appoint or temporarily designate a qualified "Radiation Safety Officer (RSO)-Equivalent" (RSO-E) and modify training and qualifications for the Radiation Safety Technician (RST) and Qualified Designee positions in License Condition 32. Docket No. 40-8903**

Dear Ms. Wong:

Homestake Mining Company of California (HMC) respectfully requests that the Nuclear Regulatory Commission (NRC) amend License No. SUA-1471 to modify LC 32 in accordance with the reasons and proposed license amendment request (LAR) outlined in this submittal. The proposed LAR is appropriate for the occupational radiation exposure risk of HMC's ongoing remediation and reclamation activities, as well as consistent with NRC regulatory guidance.

If you have any questions, please do not hesitate to contact me.

Respectfully,

Eric Burch
Signer ID: XGGZKJ0E14...

Eric Burch
Closure Manager
Homestake Mining Company of California
Office: 505.287.4456 x34 | Cell: 775.934.1766

Copy To:

M. McCarthy, Barrick, Salt Lake City, Utah (electronic copy)
D. Lattin, Barrick, Elko, Nevada (electronic copy)
R. Whicker, Environmental Restoration Group, Albuquerque, New Mexico (electronic copy)

Enclosures: Attachment 1 – Documentation of Training for RSO-E Role
Attachment 2 – Technical Memorandum on ROS-E Qualifications
Attachment 3 – NRC Form 313

License Amendment Request

1. Overview

Homestake Mining Company of California (HMC) is requesting an amendment to Condition 32 of Radioactive Materials License SUA-1471 at the Grants Reclamation Project (GRP) in Cibola County near Milan, New Mexico (Site). License Condition (LC) 32 currently states the following:

> *The licensee shall follow the guidance set forth in U.S. Nuclear Regulatory Commission Regulatory Guides 8.22, "Bioassay at Uranium Mills" (as revised), and 8.30, "Health Physics Surveys in Uranium Recovery Facilities" (as revised), or NRC-approved equivalent.*
>
> *The licensee shall follow the guidance set forth in U.S. Nuclear Regulatory Commission Regulatory Guide 8.31, "Information Relevant to Ensuring That Occupational Radiation Exposures at Uranium Recovery Facilities Will Be as Low as Is Reasonably Achievable" (as revised), or NRC-approved equivalent, with the following exception:*
>
> *The licensee may temporarily assign qualified designee(s) to perform daily inspections in the absence of the Radiation Safety Officer (RSO) and Radiation Safety Technician (RST). Qualified designee(s) may perform daily inspections on weekends, holidays, or anytime the RSO and RST must otherwise be absent during Site operations, subject to the training requirements and limitations specified in Attachment 1 of the May 5, 2020, license amendment request (NRC Agencywide Documents Access and Management System (ADAMS) Accession No. ML20133J904).*

Specifically, HMC is requesting the following modifications to LC 32:

1) Modification to permit the licensee to permanently appoint or temporarily designate a qualified "Radiation Safety Officer (RSO)-Equivalent" (RSO-E) for onsite administration and oversight of the radiation protection program (RPP) at the GRP facility for individual(s) that meet the criteria specified in Section 4.2.1 of U.S. Nuclear Regulatory Commission (NRC) Regulatory Guide (RG) 8.31 with respect to qualifications for the RSO role.
2) Modification of the training and qualifications specified in RG 8.31 for the Radiation Safety Technician (RST) position to include only the following requirements: 1) 24 hours of formal health physics classroom training relevant to uranium recovery facilities, 2) Hazardous Materials (HAZMAT) Worker training for shipping of environmental samples that require UN2910 shipping protocols under U.S. Department of Transportation (DOT) regulations, 3) training on the Radiation Protection Program (RPP) Manual and implementing set of standard operating procedures (SOPs), 4) three weeks of on-the-job RST training, and 5) ongoing performance of related duties under the supervision of the RSO-E.
3) Modification of the qualifications stated in Attachment 1 of the May 5, 2020 license amendment request (LAR) (ADAMS Accession No. ML20133J904) to permit a Qualified Designee to perform daily inspections [as approved by NRC under Amendment 56 (ML20147A107)] to be replaced by three (3) months of experience working at the Site (instead of one full year).

The RSO for the facility will continue to be a contracted consultant, a Certified Health Physicist (CHP) with the American Academy of Heath Physics (AAHP) with extensive experience in applied occupational and environmental health physics at UR facilities in the U.S. Consistent with current specifications of LC 32, both

the RSO and RSO-E designee shall at minimum meet the training and qualification specifications for the RSO role as described in Section 2.4.1 of RG 8.31.

2. Radiation Protection Staff Roles and Responsibilities

Under this LAR, current roles and responsibilities for HMC radiation protection staff at the GRP facility will not change. Only the following modifications are requested: 1) the title of the currently designated "Alternate RSO" (ARSO) would change to become "RSO-Equivalent" (RSO-E), 2) RSTs would no longer be required to meet the training and qualifications specifications for the RST position as stated in RG 8.31 since respective job duties are conducted under the supervision of the RSO-E, and 3) the qualifications for the Qualified Designee for daily inspections would change (from 1 year of experience working at the site, to 3 months experience). Accordingly, the RPP Manual will be updated to provide more detailed and comprehensive descriptions of roles and responsibilities for each RPP staff member. These descriptions are as follows:

1) **Radiation Safety Officer:** The RSO, a contracted Certified Health Physicist (CHP) consultant acting on behalf of HMC, reports to the GRP Closure Manager and provides high-level occupational and environmental health physics expertise and licensing support for HMC at the GRP facility, including:

   - Technical and regulatory-based designs for elements of the RPP and associated standard operating procedures (SOPs) in accordance with LC 10 (Tables 1 and 3).
   - Calculation of annual estimates of occupational doses (documented in Annual ALARA Audit Reports per 10 CFR 20.1101).
   - Calculation of annual estimates of public doses (documented in 2nd half semiannual environmental and effluent monitoring reports per 10 CFR 40.65).
   - Routine review of monthly ALARA audit reports generated by the RSO-E (formerly ARSO).
   - Routine review of field level risk assessments (FLRAs) to determine need for RWPs or other radiological controls for nonroutine site activities not covered by SOPs.
   - Issuance of radiation work permits (RWPs) and/or other radiological controls for nonroutine site activities not covered by SOPs.
   - Evaluation and advising for unplanned releases and development of related dose assessments.
   - Technical and regulatory support for license renewals and amendment requests.
   - Develops and performs annual radiation protection training for all applicable GRP employees.
   - Completes relevant health physics and RSO refresher training every two years.
   - Attends routine (monthly) videoconference calls for licensing updates with NRC staff and updates to NRC and other regulatory agencies (e.g., NMED, EPA) concerning GRP activities and projects.
   - Remotely available during routine NRC site inspections (by phone, videoconferencing, or email) including attendance at kickoff/closeout meetings between NRC staff and HMC management.

2) **RSO-Equivalent (formerly ARSO):** The RSO-E reports to both the RSO and Closure Manager, and is responsible for the following:

   - Daily onsite oversight and administration of the RPP as generally defined in LC 10 (Tables 1 and 3) and detailed in the corresponding RPP Manual and implementing set of SOPs.
   - Provides onsite supervision of RSTs and Qualified Designees for daily site inspections, and reviews associated documentation.

- Trains RSTs to perform their job duties as required under the RPP Manual and in accordance with the implementing set of SOPs.
- Serves as the RST as needed (e.g., when a qualified RST is not available due to illness, vacations, offsite trainings, etc.).
- Assists the RSO with annual radiation protection training for all applicable GRP employees.
- Completes relevant health physics and RSO refresher training every two years.
- Completes DOT Hazardous Materials (HAZMAT) Worker training every three years to allow shipping of small quantities of radioactive material (environmental samples) as needed under UN2910 protocols for limited quantities and excepted packaging.
- Performs a site inspection on a weekly basis, which doubles as a daily walkthrough inspection, both of which have been interpreted from RG 8.31 to focus on identification of spills, leaks, or upset conditions that could lead to unplanned exposures to workers or the public as this is not an operational milling facility and radiation protection procedures have limited applicability to most routine site activities. Weekly inspection results are routinely summarized via email to the RSO and Closure Manager, and are documented in monthly ALARA audit reports.
- Acts on behalf of the RSO if the RSO is temporarily unavailable for time-sensitive decision making on RPP matters (e.g., spill response, response to unplanned exposures, determination of need for an RWP or radiation control measures under an FLRA, etc.).
- Evaluates potential exposure circumstances associated with nonroutine work activities, describes the scope of the work to the RSO in FLRAs, and provides recommendations to the RSO regarding the need for any special radiological controls, ranging from personnel and equipment contamination surveys under SOP-2 (FLRAs), to issuance of a RWP under LC 24 and SOP-18.
- Attends routine (monthly) videoconference calls for licensing updates with NRC staff and updates to NRC and other regulatory agencies (e.g., NMED, EPA) concerning GRP activities and projects.
- Physically attends and supports NRC staff during NRC site inspections including attendance at kickoff/closeout meetings between NRC staff and HMC management.

Note that on occasions when the RSO-E is not available for onsite oversight of RSTs and RPP implementation during normal business hours at the GRP facility due to a planned absence (e.g., vacation, offsite trainings, etc.), every effort shall be made to cover the absence with a qualified health physics consultant whom also meets the training and qualification specifications of RG 8.31 for the RSO position, and whom is intimately familiar with the RPP at the GRP facility (i.e., a backup RSO-E).

Also note that this amendment is not intended to imply that the RST cannot work independently at the site if an RSO-E is temporarily unavailable due to an unplanned absence (e.g., illness, injury, family emergency, etc.). In such circumstances, the RST is still subject to remote oversight by the RSO-E (and/or RSO) and documentation generated by RST activities during an unplanned RSO-E absence shall be reviewed by the RSO-E upon returning to active onsite duty. In addition, if an upset condition (e.g., major leak, spill, or unplanned exposure) occurs when the RSO-E is unavailable, the RST will be trained to contact the RSO immediately for advising and to notify the Closure Manager (the backup RSO-E may also be contacted if the RSO cannot be reached immediately).

3) **Radiation Safety Technician:** The RST reports directly to the RSO-E and is responsible for the following:

- Implementation of applicable RPP Manual requirements in accordance with associated SOPs including occupational and environmental radiation monitoring programs under LC 10 (Tables 1 and 3), the RPP Manual, and implementing set of SOPs.
- Oversees and trains Qualified Designees to perform daily site inspections and complete the associated inspection checklist.
- Implements personnel dosimetry and bioassay sampling programs as directed by the RSO-E and as required by LC 10 and the RPP Manual.
- Conducts radiological contamination surveys for designated workplace areas as required under the RPP Manual and applicable SOPs.
- Conducts contamination release surveys for personnel and equipment as required by the RSO and/or RSO-E under an FLRA or RWP as described in the RPP Manual and in accordance with applicable SOPs.
- Collects occupational/environmental air monitoring data, along with samples from groundwater monitoring wells.
- Completes DOT Hazardous Materials (HAZMAT) Worker training every three years to allow shipping of small quantities of radioactive material (environmental samples) as needed under UN2910 protocols for limited quantities and excepted packaging.
- Inspects and maintains site access controls, radiological warning signage, and effluent control and waste management systems.
- Enforces worker compliance with RPP procedures, where applicable (e.g., when radiological controls are required by the RSO or RSO-E under an FLRA or RWP).
- Ensures proper records keeping and maintains instrument calibrations and documentation of proper function for daily use.

4) **Qualified Designees for Daily Inspections:** RG 8.31 specifies that the RSO or RST should perform a daily walk-through (visual) inspection of all work and storage areas of the facility. Given that the GRP is no longer an operational mill, the primary objective of daily walk-through inspections has been interpreted for applicability to site-specific conditions as reflected in the following Qualified Designee responsibilities:

   - Identify leaks, spills, or upset conditions at water treatment and waste management facilities that could lead to unplanned releases and/or potential radiological exposures to workers or the public.
   - Document daily inspection results on the provided checklist for subsequent RSO-E and/or RST reviews.
   - Perform the above tasks when the RSO-E or RST are not available onsite to perform these routine inspections (e.g., weekends, holidays, paid leave, offsite trainings, etc.), subject to the objectives, training requirements, and limitations specified in Attachment 1 of HMC's January 5, 2026 LAR concerning the training and qualification requirements for Qualified Designees (as modified from Amendment 56).
   - The updated training and experience requirements for Qualified Designees are provided in Attachment 1 of this LAR.

3. License Amendment Request

HMC is proposing the following modifications to LC 32 of Radioactive Materials License (RML) SUA-1471 with the NRC:

> *The licensee shall follow the guidance set forth in U.S. Nuclear Regulatory Commission Regulatory Guides 8.22, "Bioassay at Uranium Mills" (as revised), and 8.30, "Health Physics Surveys in Uranium Recovery Facilities" (as revised), or NRC-approved equivalent.*
>
> *The licensee shall follow the guidance set forth in U.S. Nuclear Regulatory Commission Regulatory Guide 8.31, "Information Relevant to Ensuring That Occupational Radiation Exposures at Uranium Recovery Facilities Will Be as Low as Is Reasonably Achievable" (as revised), or NRC-approved equivalent, with the following modifications and exceptions:*
>
> *1) The licensee may permanently appoint or temporarily designate a qualified "Radiation Safety Officer (RSO)-Equivalent" (RSO-E) for onsite administration and oversight of the radiation protection program (RPP) at the GRP facility for individual(s) that meet the criteria specified in Section 2.4.1 of U.S. Nuclear Regulatory Commission (NRC) Regulatory Guide (RG) 8.31 concerning qualifications for the RSO position at a uranium recovery facility.*
>
> *2) The training and qualifications required for the Radiation Safety Technician (RST) position may be modified from RG 8.31 specifications to include only the following requirements: 1) 24 hours of formal health physics classroom training relevant to uranium recovery facilities, 2) Hazardous Materials (HAZMAT) Worker training for shipping of limited quantities of radioactive material (environmental samples) that require UN2910 shipping protocols under U.S. Department of Transportation (DOT) regulations, 3) training on the Radiation Protection Program (RPP) Manual and implementing set of standard operating procedures (SOPs), 4) three weeks of on-the-job RST training, and 5) ongoing performance of related duties under the supervision of the RSO-E.*
>
> 3) *License Condition 32 which permits the licensee to temporarily assign Qualified Designee(s) to perform daily inspections in the absence of the RSO and RST, subject to the training requirements and limitations specified in Attachment 1 of the May 5, 2020 license amendment request (ML20133J904), is hereby amended to replace the previous requirement from License Amendment 56 (ML20147A106) for Qualified Designees to have 1 year of experience working at the Site with a modified requirement for 3 months experience working at the Site.*

Attachment 1 to this submittal provides updated Qualified Designee requirements as modified from HMC's May 5, 2020 license amendment request (ML20133J904). Attachment 2 provides an example technical memorandum from the current RSO for the GRP facility to the Site's Closure Manager which documents the qualifications of two specific individuals that are currently qualified under Section 2.4.1 of RG 8.31 to serve as RSO and recommends respective appointment or designation to serve in an RSO-E capacity at the Site. Note that Attachment 2 is provided as example documentation of qualifications for the RSO-E position, and inclusion in this LAR is not intended to appoint or designate these specific individuals as a licensing action or license condition tied to this LAR – such documentation of qualifications for the RSO-E position will be maintained by the licensee and made available for NRC staff review as part of the part of the routine NRC Site inspection process.

Finally, Attachment 3 provides NRC Form 313. HMC understands that this proposed licensing action is eligible for a Categorical Exclusion to the requirements of 10 CFR 51 per the criteria in §51.22(c)(3)(iv). Therefore, no Environmental Report is provided as identified in Criterion 9 of 10 CFR 40 Appendix A.

Thank you for your time and attention on this matter. If you have any questions, please contact me via e-mail at ebirch@barrick.com or via phone at (775) 934-1766.

ATTACHMENT 1

Qualified Designee Requirements

REQUIREMENTS FOR QUALIFIED DESIGNEE(S) TO PERFORM DAILY INSPECTIONS

1. QUALIFICATIONS: Qualified Designee(s) to perform daily facility inspections under License Condition 32 and the Radiation Protection Program shall be a regular HMC employee with at least three months of experience working at the Site to ensure familiarity with Site objectives, operations and facilities, and must also attend routine annual radiation protection training (given to all regular employees by the RSO) and weekly staff safety meetings. In addition, the Designee must demonstrate to the satisfaction of the RSO or ARSO adequate knowledge of daily inspection objectives and requirements.

2. TRAINING: Qualified Designee(s) shall attend at least two hours of specialized classroom instruction for daily inspections and a minimum of 3 sessions of on-the-job training during daily inspections led by the RSO, ARSO, or RST. An exam will be given to RST Designee trainees following successful completion of all associated training. Trainees must attain an exam score of 70% to qualify as a Qualified Designee for daily inspections. Designees will receive refresher classroom training and an exam for daily inspections annually. All training for this role will be documented and will cover the following scope of daily Site inspections:

    - Facilities to be inspected during each day of licensed operations shall include the ponds (EP-1, EP-2, EP-3, and the East/West Collection Ponds), Large Tailings Pile, Small Tailings Pile, Reverse Osmosis Plant (including tanks, piping, valves, etc., both inside and outside the RO Plant), and groundwater wells and conveyance piping in the immediate vicinity of these facilities.

    - Applicable regulatory requirements under 10 CFR 20 and 10 CFR 40 along with related specifications from NRC Regulatory Guide 8.31 as required by License Condition 32.

    - Types of radioactive materials stored at the Site and where/how these materials are contained in storage to prevent human exposure and environmental migration.

    - Site facilities and access controls.

    - Daily inspection objectives, what to look for, and what to do if upset conditions are observed. Examples of what to look for during daily inspections shall include:

        - Spills or leaks of impacted groundwater.
        - Damage or failure of primary and/or secondary containment systems for caustic, acid or fuel tanks.
        - Release of liquid or solid waste materials from water collection or evaporation ponds.
        - Erosional rills, gullies, piping or subsidence of cover or embankment materials in localized areas on the LTP, STP, and evaporation/collection ponds.
        - Spread of evaporative salts beyond pond liners and/or embankments.
        - Malfunctioning or damaged equipment.
        - Trapped or deceased wildlife.

    - Documentation of inspection results on the daily inspection form and requirements for review of these reports by the RSO, ARSO, and/or RST.

- Response to unplanned release of radioactive materials and spill reporting criteria [from SOP-21 *Spill Response and Reporting*, applicable NRC regulations (10 CFR 20.60), NM Administrative Code regulations, License Condition 41, and Discharge Permit DP 200 requirements].
- Radiation Protection Staff contact information (cell numbers for RSO, ARSO, RST, and Closure Manager).

3. LIMITATIONS: Because the RSO, ARSO, and RST do not normally work onsite on weekends, yet decommissioning activities and groundwater treatment systems and procedures are subject to continuous year-round operations, Qualified Designees will primarily provide daily inspection coverage on weekends. As such, and given additional accommodation for holidays, vacation and sick leave, Qualified Designee(s) may perform daily inspections for up to 120 individual days in any given calendar year, not to exceed 7 consecutive days during any period of RSO/ARSO/RST absence.

4. ADDITIONAL REQUIREMENTS: Daily inspection reports will be reviewed by the RSO, ARSO, or RST no later than the end of the first day of return to work following an absence, and will sign/date the inspection form to document the review. The licensee will ensure that the RSO, ARSO, or RST are available by phone during designee inspections, and the Designee shall contact the RSO, ARSO, or RST as soon as possible to report any upset conditions or identified changes in Site conditions that raise potential radiological exposure concerns with respect to licensed radioactive materials.

ATTACHMENT 2

Technical Memorandum on RSO-E Qualifications

Environmental Restoration Group, Inc.
8809 Washington St NE, Suite 150
Albuquerque, NM 87113
ph: (505) 298-4224

ERG *Professional Health Physics Services*

TECHNICAL MEMORANDUM	
To: Eric Burch (HMC)	**Date**: January 5, 2026
From: Randy Whicker (ERG)	**Project**: HMC Grants Reclamation Project
Direct: 970-556-1174	**Task(s)**: General RSO & Health Physics Support
Cc: Kyle Martinez (HMC); Chuck Farr (ERG)	
Subject: Assessment of RSO-Equivalent qualifications for Kyle Martinez (HMC) and Chuck Farr (ERG)	

Eric,

This technical memorandum provides a review and evaluation of health physics training records and qualifications for Mr. Kyle Martinez to serve as a Radiation Safety Officer (RSO)-Equivalent (RSO-E) at the Homestake Mining Company of California (HMC) Grants Reclamation Project (GRP) under the specifications stated for the RSO position in U.S. Nuclear Regulatory Commission (NRC) Regulatory Guide 8.31 as required under License Condition (LC) 32. In addition, since Chuck Farr with Environmental Restoration Group, Inc. (ERG) has been standing in for Kyle during planned absences (e.g., vacations, offsite trainings, etc.) in recent years, we expect that Chuck also requires documentation that he meets LC 32 requirements to serve as an onsite RSO-E when covering for Kyle in this capacity. Since July 2021, Mr. Martinez has served in an analogous role as "Alternate RSO" (ARSO) under the RPP Manual after meeting the training and qualifications specified for the RSO role in Section 2.4.1 of RG 8.31. This recommendation was documented in a memorandum from the RSO to the GRP Closure Manager on July 16, 2021 and the RPP Manual was updated accordingly (Revision 4, February 1, 2022). Since then, the ARSO (Kyle Martinez) has received considerable additional health physics refresher training and has been responsible for onsite administration of the RPP and implementing SOPs. Although the RST position under the RPP is primarily responsible for implementation of most RPP/SOP requirements, this work has always been conducted under supervision of the ARSO (RSTs report to Kyle Martinez on all RPP matters).

The attached review and documentation demonstrates that both Kyle Martinez (HMC) and Chuck Farr (ERG) meet the necessary training and qualifications to serve in an onsite RSO-E capacity and I recommend an amendment to LC 32 that permits the licensee to appoint or designate one or more qualified individuals to serve as the RSO-E. This is expected to support a license amendment request (LAR) that will modify LC 32 to relieve the current regulatory burden of maintaining qualified RSTs at the site under the current general reference to RG 8.31 in LC 32.

Please let me know if you have questions or need more information.

Thanks,

Randy Whicker, CHP
RSO, HMC Grants Reclamation Project
ERG
Environmental Restoration Group, Inc.
8809 Washington St. NE, Suite 150
Albuquerque, NM 87113
Email: RandyWhicker@ergoffice.com
Primary (cell): 970-556-1174; Office: 505-298-4224

1 Regulatory Requirements

In accordance with 10 CFR 20.1101, all NRC licensees must "develop, document, and implement a radiation protection program commensurate with the scope and extent of licensed activities and sufficient to ensure compliance with the provisions of this part." Based on guidance found in the U.S. Nuclear Regulatory Commission's (NRC) Regulatory Guide 8.31, the radiation protection program (RPP) at uranium recovery facilities is to be developed and administered by a qualified Radiation Safety Officer (RSO).

Although uranium milling facilities at Homestake Mining Company of California's (HMC) Grants Reclamation Project (Site) were demolished and buried in 1995, and the Site has since functioned as a groundwater remediation and environmental monitoring facility working towards Site decommissioning and closure, Condition 21 of Radioactive Materials License (RML) SUA-1471 with the NRC requires that the RSO "shall possess the minimum qualifications as specified in Section 2.4.1 of Regulatory Guide 8.31". While not discussed in RG 8.31, some sites, such the Grants Reclamation Project, do not require a full-time RSO and instead rely on an RSO-Equivalent (RSO-E) to administer RSO responsibilities onsite. NRC staff's communicated expectation is that the RSO-E will meet the specifications in Section 2.4.1 of RG 8.31 for the RSO position.

This review documents that both Kyle Martinez, a fulltime HMC employee with approximately 10 years experience with implementation of the radiation protection program at the GRP facility, and Chuck Farr, a professional health physics consultant with over 30 years experience with radiation protection procedures at the GRP facility, each possess the education, training and experience necessary to qualify as an RSO under RG 8.31 specifications and are thus qualified and recommended to serve in an RSO-E capacity at the GRP facility.

2 Summary of Relevant Education, Training and Experience

Section 2.4.1 of RG 8.31 recommends the following education, training and experience requirements to be appointed as an RSO at a licensed, fully operational uranium mill. These RG 8.31 RSO qualifications are reproduced below, and following each qualification requirement, are notes that summarize how Mr. Martinez and Mr. Farr each meet the specified qualification. Documentation of representative selection of education and relevant health physics trainings is provided in Attachment 1.

1. **Education**: A bachelor's degree in the physical sciences, industrial hygiene, or engineering from an accredited college or university or an equivalent combination of training and relevant experience in UR facility radiation protection. Two years of relevant experience are generally considered equivalent to 1 year of academic study.

    - Kyle Martinez has a B.S. degree in Environmental Science from an accredited university. A copy of his diploma is provided in Attachment 1.

    - Chuck Farr has a B.S. Degree in civil engineering from New Mexico State University. He also has an M.B.A. degree from the University of New Mexico.

2. **Health Physics Experience**: At least 1 year of work experience relevant to UR operations in applied health physics, radiation protection, industrial hygiene, or similar work. This experience should involve actually working with radiation detection and measurement equipment, not strictly administrative or "desk" work.

- Kyle Martinez has over 10 years Site-specific experience with applied health physics and radiation protection serving in RST and ARSO roles at the Site, including direct responsibility for occupational surveys with radiation detection instruments and environmental monitoring with associated equipment. Documentation of his work is reflected in RPP records that are routinely inspected by the NRC, and his performance has consistently maintained the RPP in compliance with applicable regulations and license conditions.

- Chuck Farr has been involved with the GRP facility as a health physics consultant to HMC for over 30 years, and is intimately familiar with the RPP and implementing set of SOPs. For the past 4-5 years Chuck has spent a minimum of 1 day per month at the Site reviewing RPP records (e.g., instrument function checks and calibrations), performing surveys of equipment and personnel, conducting leak tests on check sources, assisting with monthly ALARA audits of the RPP, and assisting with training of RSTs. He has also routinely been standing in for Kyle Martinez as a temporary backup ARSO and RST during planned absences (e.g., when neither Kyle nor a regular RST are available onsite due to vacations, offsite trainings, etc.). Since 2017, Mr. Farr has also physically attended all NRC Site inspections (two inspections per year, each taking three days to complete).

3. **Specialized Training**: At least 4 weeks of specialized classroom training in health physics specifically applicable to uranium recovery. In addition, the RSO should attend refresher training on UR facility health physics every 2 years.

    - Since 2017, Kyle Martinez has logged over 6.5 weeks of specialized classroom training directly relevant to health physics and radiation protection at uranium recovery facilities, and since his internal appointment as ARSO in 2021, he has attended 40 hours of RSO refresher training every other year. A representative selection of formal training certificates for Kyle reflecting a minimum of 4 weeks of applicable training are provided in Attachment 1.

    - Chuck Farr has received well over 4 weeks of specialized classroom training relevant to health physics and radiation protection at uranium recovery facilities, including the following (certificates are provided in Attachment 1):

        - 8 × 4 Hours for DOT HAZMAT / Dangerous Goods Shipping needed for Shipping UN2910 (Radioactive Material, Limited Quantity, Excepted Package)
        - 1 × 8 Hours for NORM Surveyor training
        - 2 × 16 Hours for Ludlum Instrument Calibration training
        - 1 × 40 Hours RSCS Radiation Safety Officer course
        - 2 × 24 Hour Sandia National Laboratories Radiation Worker – II training
        - 1 × 24 Hour Los Alamos National Laboratory Radiation Worker – II training

      These trainings alone amount to 184 hours (4.6 weeks) and Mr. Farr has received additional relevant trainings over the past 30 years.

4. Specialized Knowledge: A thorough knowledge of the proper application and use of all health physics equipment used in the UR facility, the chemical and analytical procedures used for radiological sampling and monitoring, methodologies used to calculate personnel exposure to uranium and its daughters, and a thorough understanding of the UR process and equipment used in the facility and how the hazards are generated and controlled during the UR process.

- Over the past decade of fulltime employment at the GRP facility, Kyle Martinez has acquired a thorough understanding of proper use of health physics instruments and equipment at the Site, including devices for occupational air monitoring, bioassay sampling, dosimetry, and contamination surveys, along with environmental air particulates, radon and ambient gamma dose rate monitoring. He also has knowledge of water treatment system operations to remove uranium from groundwater, and a thorough understanding of associated radiological hazards as well as hazards for other water treatment and waste management facilities (e.g. evaporation ponds) at the Site, and how to recognize and mitigate routine and unplanned releases or worker exposures.

- Over the past 30 years of periodically working as a health physics consultant at the GRP facility, Chuck Farr has also acquired a thorough understanding of proper use of health physics instruments and equipment at the Site, including devices for occupational air monitoring, bioassay sampling, dosimetry, and contamination surveys, along with environmental air particulates, radon and ambient gamma dose rate monitoring. He also has knowledge of water treatment system operations to remove uranium from groundwater, and a thorough understanding of associated radiological hazards as well as hazards for other water treatment and waste management facilities (e.g. evaporation ponds) at the Site, and how to recognize and mitigate routine and unplanned releases or worker exposures.

ATTACHMENT 1: DOCUMENTATION OF TRAINING FOR RSO-E ROLE

University of Phoenix

Upon the recommendation of the Faculty,
University of Phoenix does hereby confer upon

Kyle Wade Martinez

the degree of

Bachelor of Science in Environmental Science

Graduated with Honors

with all the rights, honors and privileges thereunto appertaining.

In witness whereof, the seal of the University and the signatures as authorized by the Board of Trustees, University of Phoenix, are hereunto affixed, this twenty-ninth day of February, in the year two thousand twenty.

Chairman, Board of Trustees

University of Phoenix

President

Radiation Safety & Control Services, Inc.

Awards this certificate to

Kyle Martinez

in recognition of satisfactory completion of a 40 hour course in

Radiation Safety Officer Training

Las Vegas, NV

December 9- 13, 2019

RSCS
Radiation Safety & Control Services

Jennifer A. Collins - Enrollee Training Manager

RSCS
Radiation Safety & Control Services

Course Instructors: Frederick P. Straccia, CHP

This course has been approved for 40 CE credits by the AAHP (ID number 2013-00-002).

ORAU

This is to certify that

Kyle Martinez

has completed the

40-Hour Applied Health Physics I Online Training Course

conducted by

the Professional Training Programs of ORAU

This *28th* day of *June, 2021*

RADIOLOGICAL PTP Since 1948 SCIENCES TRAINING

Tonya Bernhardt, M.S., CHP

Radiation Safety & Control Services, Inc.

Awards this certificate to

Kyle Martinez

in recognition of satisfactory completion of a 40 hour course in

Radiation Safety Officer Training

Las Vegas, NV

December 6- 10, 2021

RSCS
Radiation Safety & Control Services

Enrolled Training Manager

RSCS
Radiation Safety & Control Services

Course Instructors: Frederick P. Straccia, CHP

This course has been approved for 40 CE credits by the AAHP (ID number 2013-00-002).

Kyle Martinez

Has successfully completed the 40 hour technical short course entitled

Radiation Safety Officer

November 6, 2023 - November 10, 2023

This certificate presented in Las Vegas, NV., November 10, 2023

By Nevada Technical Associates, Inc.

Approval codes for CE units are: ASRT, Class A, NVZ0143001, 43 Units. CIHCM Eligible

ROGER SIT

CERTIFICATE NUMBER: 1699286416

ASRT CEU EXPIRATION DATE: SEPTEMBER 1, 2025

Kyle Martinez

Has successfully completed the 40 hour technical short course entitled

Radiation Safety Officer

November 10, 2025 – November 14, 2025

This certificate presented in Las Vegas, NV, November 14, 2025

By Nevada Technical Associates, Inc.

Approval codes for CE units are: ASRT, Class A, NVZ0143001, 41.5 Units. CIHCM Eligible
ASRT CE Units Expiration Date: September 1, 2028

CERTIFICATE NUMBER: 1763643610

ROGER SIT

Radiation Safety & Control Services, Inc.

Awards this certificate to

Chuck Farr

in recognition of satisfactory completion of a 40 hour course in

Radiation Safety Officer Training

Las Vegas, NV

December 9- 13, 2019

RSCS
Radiation Safety & Control Services

Jennifer A. Collins - Enrolled Training Manager

RSCS
Radiation Safety & Control Services

Course Instructors: Frederick P. Straccia, CHP

This course has been approved for 40 CE credits by the AAHP (ID number 2013-00-002).

[redacted]

[redacted]

2018
24
HOURS

[redacted]

1998
24 HOURS

[redacted]

[redacted]

24 HOURS

2017

[redacted]

Certificate of Completion

This certifies that

Chuck Farr

has successfully Completed a 16 hour training session on Calibration and Minor Repair of Ludlum Measurements Instruments Given by Ludlum Measurements Inc.
Sweetwater, Texas

February 10th -11th, 2015

LUDLUM MEASUREMENTS, INC. T E X A S

Randall D. Smith
Customer Training Manager
Ludlum Measurements Inc.

Certificate of Completion

This certifies that

Chuck Farr

Has successfully completed a 16 hour training class on basic Radiation Detection Instrument Calibration from Ludlum Measurements, Inc.

April 5-6th, 2022

This course has been granted 32 continuing education credits by AAHP (American Academy of Health Physics. Course ID 2019-04-001, valid through 2023

LUDLUM MEASUREMENTS, INC. T E X A S

Ashley Ramey

Ashley Ramey

Trainer, Ludlum Measurements Inc.

SPECIALIZED TRAINING CERTIFICATE

Chuck Farr

Has Successfully Completed an **Eight (8) Hour** Training Course as an Oil and Gas

NORM/TENORM SURVEYOR

Course Completed: June 22, 2023

The course is recognized as acceptable specialized training by the Texas Department of State Health Services, 25 TAC §289, and the Railroad Commission, 16 TAC §4.6. The course includes, but is not limited to, the following:

- Origins of NORM, Atomic Theory, Sources of Radiation Exposure, and Minimizing Exposure
- Petroleum, Natural Gas Condensate, Upstream, Midstream, and Downstream Processes
- Biological Effects of Radiation, Exposure to an Unborn Child, and Risks Associated with Radiation Exposure
- NORM/TENORM State Regulations – AR, CO, GA, LA, ME, MS, NM, ND, OH, OR, TX, and WV
- Federal Regulations, CRCPD Part N, Legal Responsibilities, and General / Specific Licenses
- Radiation Protection Plans, Waste Management Programs, Personnel Monitoring, and Liability Minimization
- Survey Instrumentation, Performing Radiation and Contamination Surveys, and Documenting Surveys
- Surveyor Responsibilities, Problems and Solutions, Radiation Units, and Sampling Methods
- Decontamination Methods, Respiratory Protection, Shipping / Manifesting, and Disposal Options

NORM SOLUTIONS "We have solutions for your NORM problems"

www.normsolutions.com

Geri Blanchard, MS, REM, CSP – The NORM LADY™
President / CRSO

Certificate of Training

Awarded To

Chuck Farr

has been trained, tested and successfully completed < 4 Hours of specialized instruction in

DOT, IATA, and NRC Requirements for Shipping Limited Quantity Radioactive Materials

February 17, 2009

Presented By:

Radiation Safety Academy
a division of Dade Moeller & Associates
438 N. Frederick Ave Ste. 220
Gaithersburg, MD 20877

Sean Austin, MS, RSO, CHP
Senior Health Physicist

This certifies that the employee named on this certificate has been trained and tested in accordance with the training requirements of 49 CFR 172, Subpart H.

Employer's Signature

This certificate is valid for 24 months for ICAO/IATA and for three years for U.S. Department and Transportation and U.S. Nuclear Regulatory Commission or Agreement State Agencies.

Environmental Restoration Group, Inc.

ERG

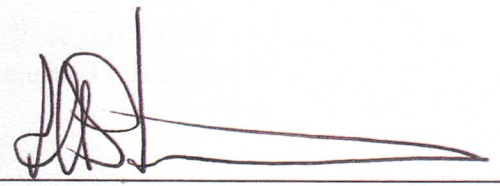
Certificate of Completion

is hereby granted to

Chuck Farr

to certify that he/she has completed to satisfaction:

- **General Awareness & Familiarization of DOT's HAZMAT Regulations,**
- **General Safety Training,**
- **Security Awareness Training,**
- **Function Specific Training – DOT, IATA, & NRC Requirements for Shipping Limited Quantity Radioactive Materials**



Scott Heronimus (instructor)

March 4th, 2011

Date

Environmental Restoration Group, Inc.

ERG

Certificate of Completion

is hereby granted to

Chuck Farr

to certify that he/she has completed to satisfaction:

- **General Awareness & Familiarization of DOT's HAZMAT Regulations,**
- **General Safety Training,**
- **Security Awareness Training,**
- **Function Specific Training – DOT, IATA, & NRC Requirements for Shipping Limited Quantity Radioactive Materials**

Scott Heronimus (instructor)

February 9th, 2015

Date

Exp 2/9/18

Certificate of Training

Awarded to

Chuck Farr

has completed all the requirements for the course

Requirements for Shipping Limited Quantity Radioactive Materials

Recognizing completion of 4 hours of specialized instruction

sponsored by

Dade Moeller Training Academy
438 North Frederick Avenue
Suite 22
Gaithersburg, MD 20877

Course Modules

- Document
- DOT HAZMAT Training Introduction
- Principles of Radiation Safety
- Security Awareness
- General Awareness and Familiarization
- Function Specific Requirements I
- Function Specific Requirements II

Signed:

Academy Training Manager

Date of Completion: 03/11/2018

Dade Moeller
Training Academy
An NV5 Company

Environmental Restoration Group, Inc.

ERG

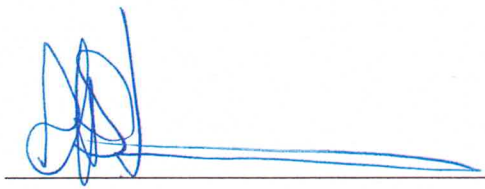
Certificate of Completion

is hereby granted to

Chuck Farr

to certify that he/she has completed to satisfaction:

- **General Awareness & Familiarization of DOT's HAZMAT Regulations,**
- **General Safety Training,**
- **Security Awareness Training,**
- **Function Specific Training – DOT, IATA, & NRC Requirements for Shipping Limited Quantity Radioactive Materials**



Scott Heronimus (instructor)

February 10th, 2017

Date

Environmental Restoration Group, Inc.

ERG

Certificate of Completion

is hereby granted to

Chuck Farr

to certify that he/she has completed to satisfaction:

- **General Awareness & Familiarization of DOT's HAZMAT Regulations,**
- **General Safety Training,**
- **Security Awareness Training,**
- **Function Specific Training – DOT, IATA, & NRC Requirements for Shipping Limited Quantity Radioactive Materials**

Training presented by:

ERG

Environmental Restoration Group, Inc.
8809 Washington St. NE, Suite150
Albuquerque, NM 87113

Chuck Farr (Instructor)

May 13, 2019

Date

Environmental Restoration Group, Inc.

ERG

Certificate of Completion

is hereby granted to:

Chuck Farr

to certify that he/she has completed to satisfaction:

- **General Safety Training**
- **Security Awareness Training**
- **General Awareness & Familiarization of DOT's HAZMAT Regulations**
- **Function Specific Training:**
  - **DOT, IATA, & NRC Requirements for Shipping Limited Quantity Radioactive Materials**
  - **DOT & IATA Requirements for Shipping a High-Pressure Ionization Chamber (HPIC)**
  - **DOT & IATA Requirements for Shipping Lithium-Ion Batteries**
  - **DOT & NRC Requirements for Shipping Low Specific Activity – I (LSA-I) Materials**

Training presented by:

ERG

Environmental Restoration Group, Inc.
8809 Washington St. NE, Suite150
Albuquerque, NM 87113

Chuck Farr (Instructor)

March 30th, 2021

Date

Environmental Restoration Group, Inc.

ERG

Certificate of Completion

is hereby granted to:

Chuck Farr

to certify that he/she has completed to satisfaction:

- **General Safety Training**
- **Security Awareness Training**
- **General Awareness & Familiarization of DOT's HAZMAT Regulations**
- **Function Specific Training:**
  - **DOT, IATA, & NRC Requirements for Shipping Limited Quantity Radioactive Materials**
  - **DOT & IATA Requirements for Shipping a High-Pressure Ionization Chamber (HPIC)**
  - **DOT & IATA Requirements for Shipping Lithium-Ion Batteries**
  - **DOT & NRC Requirements for Shipping Low Specific Activity – I (LSA-I) Materials**

Training presented by:

ERG

Environmental Restoration Group, Inc.
8809 Washington St. NE, Suite150
Albuquerque, NM 87113

C. Farr

Chuck Farr (Instructor)

March 6, 2023

Date

4 HOURS

Environmental Restoration Group, Inc.

ERG

Certificate of Completion

is hereby granted to:

Chuck Farr

to certify that he/she has completed to satisfaction on:

Feb. 13, 2025

- **General Safety Training**
- **Security Awareness Training**
- **General Awareness & Familiarization of DOT's HAZMAT Regulations**
- **Function Specific Training:**
  - **DOT, IATA, & NRC Requirements for Shipping Limited Quantity Radioactive Materials**
  - **DOT & IATA Requirements for Shipping a High-Pressure Ionization Chamber (HPIC)**
  - **DOT & IATA Requirements for Shipping Lithium-Ion Batteries**
  - **DOT & NRC Requirements for Shipping Low Specific Activity – I (LSA-I) Materials**

Training presented by:

ERG

Environmental Restoration Group, Inc.
8809 Washington St. NE, Suite 150
Albuquerque, NM 87113

C. Farr

Chuck Farr (Instructor)

Feb 14, 2025

Date

4 HOURS

ATTACHMENT 3

NRC Form 313

NRC FORM 313 **U.S. NUCLEAR REGULATORY COMMISSION**
(11-25-2025)
10 CFR 30, 32, 33, 34, 35, 36, 37, 39, and 40

APPLICATION FOR MATERIALS LICENSE

APPROVED BY OMB: NO. 3150-0120 **EXPIRES: 07/31/2026**

Estimated burden per response to comply with this mandatory collection request: 4.3 hours. Submittal of the application is necessary to determine that the applicant is qualified and that adequate procedures exist to protect the public health and safety. Send 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 email to Infocollects.Resource@nrc.gov, and the OMB Reviewer at: OMB Office of Information and Regulatory Affairs, (3150-0120), 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.

INSTRUCTIONS: SEE THE CURRENT VOLUMES OF THE NUREG-1556 TECHNICAL REPORT SERIES ("CONSOLIDATED GUIDANCE ABOUT MATERIALS LICENSES") FOR DETAILED INSTRUCTIONS FOR COMPLETING THIS FORM: http://www.nrc.gov/reading-rm/doc-collections/nuregs/staff/sr1556/. SEND ONE COPY OF THE COMPLETED APPLICATION TO THE NRC OFFICE SPECIFIED BELOW OR ONLINE AT https://www.nrc.gov/security/byproduct/ismp/wbl.html.

APPLICATION FOR DISTRIBUTION OF EXEMPT PRODUCTS FILE APPLICATIONS WITH:

MATERIALS SAFETY AND LICENSING BRANCH
DIVISION OF MATERIALS SAFETY, SECURITY, STATE AND TRIBAL PROGRAMS
OFFICE OF NUCLEAR MATERIALS SAFETY AND SAFEGUARDS
U.S. NUCLEAR REGULATORY COMMISSION
11555 ROCKVILLE PIKE
ROCKVILLE, MD 20852-2738

*NOTE: The preferred method to submit NRC Form 313 is online at https://www.nrc.gov/security/byproduct/ismp/wbl.html or email at LBLicensingAssistant.Resource@nrc.gov.
Any other documents (e.g., financial assurance documents) should be sent via email.

ALL OTHER PERSONS FILE APPLICATIONS AS FOLLOWS:

IF YOU ARE LOCATED IN:

ILLINOIS, INDIANA, IOWA, MICHIGAN, MINNESOTA, MISSOURI, OHIO, OR WISCONSIN, SEND APPLICATIONS TO:

MATERIALS LICENSING BRANCH
DIVISION OF RADIOLOGICAL SAFETY AND SECURITY
U.S. NUCLEAR REGULATORY COMMISSION, REGION III
2056 WESTINGS AVENUE, SUITE 400
NAPERVILLE, IL 60563-2657

*NOTE: The preferred method to submit NRC Form 313 is online at https://www.nrc.gov/security/byproduct/ismp/wbl.html or email at R3-DRSSMAIL.Resource@nrc.gov.
Any other documents (e.g., financial assurance documents) should be sent via email.

IF YOU ARE LOCATED IN:

ALABAMA, CONNECTICUT, DELAWARE, DISTRICT OF COLUMBIA, FLORIDA, GEORGIA, KENTUCKY, MAINE, MARYLAND, MASSACHUSETTS, NEW HAMPSHIRE, NEW JERSEY, NEW YORK, NORTH CAROLINA, PENNSYLVANIA, PUERTO RICO, RHODE ISLAND, SOUTH CAROLINA, TENNESSEE, VERMONT, VIRGINIA, VIRGIN ISLANDS, OR WEST VIRGINIA,

SEND APPLICATIONS TO:

LICENSING ASSISTANCE TEAM
DIVISION OF RADIOLOGICAL SAFETY AND SECURITY
U.S. NUCLEAR REGULATORY COMMISSION, REGION I
475 ALLENDALE ROAD, SUITE 102
KING OF PRUSSIA, PA 19406-1415

*NOTE: The preferred method to submit NRC Form 313 is online at https://www.nrc.gov/security/byproduct/ismp/wbl.html or email at R1DRSSMail.Resource@nrc.gov.
Any other documents (e.g., financial assurance documents) should be sent via email.

IF YOU ARE LOCATED IN:

ALASKA, ARIZONA, ARKANSAS, CALIFORNIA, COLORADO, HAWAII, IDAHO, KANSAS, LOUISIANA, MISSISSIPPI, MONTANA, NEBRASKA, NEVADA, NEW MEXICO, NORTH DAKOTA, OKLAHOMA, OREGON, PACIFIC TRUST TERRITORIES, SOUTH DAKOTA, TEXAS, UTAH, WASHINGTON, OR WYOMING,

SEND APPLICATIONS TO:

MATERIALS LICENSING BRANCH
DIVISION OF RADIOLOGICAL SAFETY AND SECURITY
U.S. NUCLEAR REGULATORY COMMISSION, REGION IV
1600 E. LAMAR BOULEVARD
ARLINGTON, TX 76011-4511

*NOTE: The preferred method to submit NRC Form 313 is online at https://www.nrc.gov/security/byproduct/ismp/wbl.html or email at R4licensing@nrc.gov.
Any other documents (e.g., financial assurance documents) should be sent via email.

PERSONS LOCATED IN AGREEMENT STATES SEND APPLICATIONS TO THE U.S. NUCLEAR REGULATORY COMMISSION ONLY IF THEY WISH TO POSSESS AND USE LICENSED MATERIAL IN STATES SUBJECT TO U.S. NUCLEAR REGULATORY COMMISSION JURISDICTIONS.

1. THIS IS AN APPLICATION FOR *(Check appropriate item)*

- ☐ A. NEW LICENSE
- ☑ B. AMENDMENT TO LICENSE NUMBER SUA-1471
- ☐ C. RENEWAL OF LICENSE NUMBER

2. NAME AND MAILING ADDRESS OF APPLICANT *(Include zip code)*

Homestake Mining Company of California
P.O. Box 98
Grants, NM 87020

3. LIST ADDRESS AND/OR TEMPORARY JOB SITE (TJS) ADDRESS, WHERE LICENSED MATERIALS WILL BE USED OR POSSESSED

Homesthke Mining Company of California
560 Anaconda Road, Route 605
Milan, Nm 87021

4. NAME OF PERSON TO BE CONTACTED ABOUT THIS APPLICATION

Eric Burch

BUSINESS TELEPHONE NUMBER	BUSINESS CELLULAR TELEPHONE NUMBER
505-287-4456, ext. 35	775-934-1766

BUSINESS EMAIL ADDRESS
eburch@barrick.com

SUBMIT ITEMS 5 THROUGH 11 ON 8-1/2 X 11" PAPER. THE TYPE AND SCOPE OF INFORMATION TO BE PROVIDED IS DESCRIBED IN THE APPLICABLE **LICENSING GUIDANCE**.

5. RADIOACTIVE MATERIAL a. Element and mass number; b. chemical and/or physical form; and c. maximum amount which will be possessed at any one time.	6. PURPOSE(S) FOR WHICH LICENSED MATERIAL WILL BE USED. 7. INDIVIDUAL(S) RESPONSIBLE FOR RADIATION SAFETY PROGRAM AND THEIR TRAINING AND EXPERIENCE.
8. TRAINING FOR INDIVIDUALS WORKING IN OR FREQUENTING RESTRICTED AREAS.	9. FACILITIES AND EQUIPMENT.
10. RADIATION SAFETY PROGRAM.	11. WASTE MANAGEMENT.

12. LICENSE FEES (Fees required only for new applications, at time of application submission, with few exceptions*) *(See 10 CFR 170 and Section 170.31)*
***Amendments/Renewals that increase the scope of the existing license to a new or higher fee category will require a fee.**

FEE CATEGORY | AMOUNT TO BE PAID VIA www.pay.gov | $ 0

PER THE DEBT COLLECTION IMPROVEMENT ACT OF 1996 (PUBLIC LAW 104-134), YOU ARE REQUIRED TO PROVIDE YOUR TAXPAYER IDENTIFICATION NUMBER. PROVIDE THIS INFORMATION BY COMPLETING NRC FORM 531: https://www.nrc.gov/reading-rm/doc-collections/forms/nrc531info.html. FAX THE COMPLETED NRC FORM 531 TO (301) 415-6725.

13. CERTIFICATION. *(Must be completed by applicant) THE APPLICANT UNDERSTANDS THAT ALL STATEMENTS AND REPRESENTATIONS MADE IN THIS APPLICATION ARE BINDING UPON THE APPLICANT.*

THE APPLICANT AND ANY OFFICIAL EXECUTING THIS CERTIFICATION ON BEHALF OF THE APPLICANT, NAMED IN ITEM 2, CERTIFY THAT THIS APPLICATION IS PREPARED IN CONFORMITY WITH TITLE 10, CODE OF FEDERAL REGULATIONS, PARTS 30, 32, 33, 34, 35, 36, 37, 39, AND 40, AND THAT ALL INFORMATION CONTAINED HEREIN IS TRUE AND CORRECT TO THE BEST OF THEIR KNOWLEDGE AND BELIEF.
WARNING: 18 U.S.C. SECTION 1001 ACT OF JUNE 25, 1948, 62 STAT. 749 MAKES IT A CRIMINAL OFFENSE TO MAKE A WILLFULLY FALSE STATEMENT OR REPRESENTATION TO ANY DEPARTMENT OR AGENCY OF THE UNITED STATES AS TO ANY MATTER WITHIN ITS JURISDICTION.

CERTIFYING OFFICER -- TYPED/PRINTED NAME AND TITLE	SIGNATURE	DATE
Eric Burch Closure Manager	Eric Burch Signer ID: XGGZKJ0E14...	01/05/2026