



**UNITED STATES
NUCLEAR REGULATORY COMMISSION**
REGION IV
1600 E. LAMAR BLVD.
ARLINGTON, TX 76011-4511

September 21, 2017

Mr. Michael Griffin, Vice President
Permitting, Regulatory and
Environmental Compliance
Strata Energy, Inc.
2929 New Haven Road
Oshoto, WY 82721

SUBJECT: NRC INSPECTION REPORT 040-09091/2017-003

Dear Mr. Griffin:

This letter refers to the U.S. Nuclear Regulatory Commission (NRC) inspection conducted from August 29 - 31, 2017, at your Ross Project in Crook County, Wyoming. The purpose of the inspection was to examine activities conducted under your license as they relate to public health and safety, and to confirm compliance with the Commission's rules and regulations and the conditions of your license. The inspection findings were discussed with members of your staff at the conclusion of the onsite inspection on August 31, 2017.

This inspection examined activities conducted under your license as they relate to public health and safety, the common defense and security, and to confirm compliance with the Commission's rules and regulations, and with the conditions of your license. Within these areas, the inspection consisted of selected examination of procedures and representative records, observations of activities, and interviews with personnel. Specifically, the inspectors reviewed the licensee's management control, radiation protection, effluent control, transportation, and emergency preparedness programs. No violations were identified and no response to this letter is required.

In accordance with Title 10 of the *Code Federal Regulations* (CFR) 2.390 of the NRC's "Agency Rules of Practice and Procedure," a copy of this letter, and its enclosure, will be made available electronically for public inspection in the NRC Public Document Room or from the NRC's Agencywide Documents Access and Management System (ADAMS), accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html>. To the extent possible, your response, should you choose to provide one, should not include any personal privacy or proprietary, information so that it can be made available to the Public without redaction.

If you have any questions concerning this inspection, please contact Ms. Bernadette Baca, Health Physicist at 817-220-1235 or the undersigned at 817-200-1191.

Sincerely,

/RA/

Ray L. Keller, P.E., Chief
Fuel Cycle and Decommissioning Branch
Division of Nuclear Materials Safety

Docket: 040-09091
License: SUA-1601

Enclosures:
NRC Inspection Report 040-09091/2017-003

cc:
Scott W. Ramsey, Wyoming Office of Homeland Security
Ryan Schierman, Wyoming Department of Environmental Quality
Mark Rogaczewski, Wyoming Department of Environmental Quality

U.S. NUCLEAR REGULATORY COMMISSION
REGION IV

Docket: 040-09091

License: SUA-1601

Report: 04009091/2017-003

Licensee: Strata Energy, Inc.

Location: Ross Project
Crook County, Wyoming

Dates: August 29-31, 2017

Inspectors: Bernadette D. Baca, Health Physicist
Fuel Cycle and Decommissioning Branch
Division of Nuclear Materials Safety

Martha R. Poston, Health Physicist
Fuel Cycle and Decommissioning Branch
Division of Nuclear Materials Safety

Accompanied by: Noletu Moti, Chief Inspector - NPP
National Nuclear Regulator
Republic of South Africa

Approved by: Ray L. Kellar, P.E., Chief
Fuel Cycle and Decommissioning Branch
Division of Nuclear Materials Safety

Attachment: Supplemental Information

EXECUTIVE SUMMARY

Strata Energy, Inc., In-Situ Recovery Facility
NRC Inspection Report 04009091/2017-003

The U.S. Nuclear Regulatory Commission (NRC) performed a routine scheduled health and safety inspection from August 29 - 31, 2017, which included observations of site activities, independent surveys, review of records, and interviews with site personnel. In summary, the license was conducting operations in accordance with regulatory and license requirements as described below.

Management Control and Organization

The organizational structure and staffing levels maintained by the licensee during the inspection period met the requirements specified in the license and were sufficient for the work in progress. The licensee's safety and environmental reviews were performed in accordance with the license requirements. The licensee conducted audits, inspections and program reviews as required by regulatory requirements and the license. (Section 1.2)

In-Situ Leach Facilities

The licensee has conducted in-situ recovery and operations in accordance with the license and regulatory requirements. Radiological controls including signs and postings were implemented in accordance with license and regulatory requirements. (Section 2.2)

Radiation Protection

The licensee implemented a radiation protection program that met the requirements of 10 CFR Part 20 and the license. Occupational doses were less than established limits. (Section 3.2)

Effluent Control and Environmental Protection and Maintaining Effluents from Materials Facilities As Low As Reasonably Achievable

The licensee conducted environmental monitoring in accordance with license requirements. The licensee reported the results in semi-annual reports to the NRC. The annual dose to members of the public remained below regulatory limits. The licensee was documenting spills and conducting excursion sampling as specified in the license. (Section 4.2)

Inspection of Transportation Activities and Radioactive Waste Processing, Handling, Storage and Transportation

The licensee's performance is in accordance with regulations and license commitments for processing, handling, storage and transportation of radioactive materials and waste. (Section 5.2)

Emergency Preparedness and Fire Protection

The licensee was implementing and maintaining an Emergency Response and Fire Protection Program consistent with its license conditions and operating procedures. (Section 6.2)

Report Details

Site Status

At the time of the inspection, Strata Energy, Inc. (Strata) was extracting uranium using the in-situ recovery process. Strata has been operating its uranium recovery operations since December 2015. Uranium processing and drying operations are not currently conducted at the Stata facility, rather the loaded resin is shipped to another NRC-licensed facility for conversion of the uranium loaded resins into yellowcake product. Since the last inspection, Strata sent 16 shipments of resins off-site for further processing.

Strata has header houses operating in Mine Units 1 and 2. Eight header houses are in service, with a ninth header house in recirculation mode and a tenth under construction. Strata currently utilizes one surface impoundment (Pond 1) for short-term storage of liquid 11e.(2) byproduct material prior to disposal in a deep disposal well. The flow rates to the deep disposal well averaged 12 to 19 gallons per minute.

At the time of the inspection, Strata was in a maintenance outage. The licensee was making modifications to the Central Processing Plant (CPP) to incorporate the main trunk line in the building structure for improved temperature control and install a catch basin for potential leaks. In addition, the licensee was installing additional vent valves in the ion exchange column circuit to reduce air locking of the circuit and installing a new concrete pad and booster pump for deep disposal well (DDW) DDW2.

1 Management Organization and Control (88005)

1.1 Inspection Scope

Ensure that the licensee has established an organization to administer the technical programs and to perform internal reviews, self-assessments and audits.

1.2 Observations and Findings

a. Organizational Structure

The inspectors reviewed the licensee's organization structure for Ross Project. At the time of the inspection, the site staffing consisted 40 full-time employees. All management positions were filled with qualified individuals. The RSO is supported by a full-time qualified radiation safety technician.

b. Safety and Environmental Review Panel (SERP)

License Condition 9.4 of the performance based license requires, in part, that the licensee establish a SERP process to evaluate whether program changes require an NRC license amendment prior to implementation. The inspectors reviewed ten SERP evaluations completed since the January 2017 inspection:

SERP 17-01	Approval of the new RSO
SERP-17-02	Approval for the startup of Header House 7 in Mine Unit 2
SERP-17-03	Change to the pond monitoring well action levels
SERP-17-04	Discontinuation of airborne monitoring station (South)

SERP-17-05	Approval for the startup of Header House 8 in Mine Unit 2
SERP-17-06	Approval of a technical report update to show “as built” conditions
SERP-17-07	Change to the Shallow Aquifer Upper Control Limits for Mine Unit 2.
SERP-17-08	Approval of Mine Unit 2 Upper Control Limits
SERP-17-09	Approval for startup of Header House 9 in Mine Unit 2
SERP-17-10	Testing of injection pumps to determine if high pressure pump needed to maintain injection flow rates to Disposal Well 2.

In accordance with License Condition 9.4, the licensee is expected to submit a description of each change, including a summary of each safety and environmental evaluation to the NRC in a future annual report. The inspectors found that the licensee correctly implemented the performance-based license, and the evaluations did not require prior NRC approval.

c. Audits and Inspections

Title 10 CFR 20.1101(c) and Section 2.3.3 of Regulatory Guide 8.30, as required in License Condition 9.7, require the licensee to conduct annual audits of the radiation safety and the As Low As is Reasonably Achievable (ALARA) programs. The inspectors reviewed the annual audit for 2017. The audit, performed by an outside contractor on March 29, 2017, included an evaluation of occupational exposures, radiation survey results, training and compliance with license and regulatory requirements. The inspectors determined that the audit met the requirements of 10 CFR 20.1101(c) and Section 2.3.3 of Regulatory Guide 8.30 of License Condition 9.7, as appropriate. The licensee plans to submit the results of the Radiation Safety/ALARA audit to the NRC as part of the next annual report.

Daily walk downs were required to be conducted by the Radiation Safety Officer (RSO), or Radiation Safety Technician (RST) or in their absence, by a qualified designee, provide the RSO reviews the walk down documentation, within 3 hours of the start of the next workday. The inspectors reviewed the walk-down documentation from February 2017 through August 2017. The inspectors verified the RSO, RST or a qualified designee conducted the walkdowns except for a few days which were document as self-identified issues by the RSO. The inspectors verified the RSO or RST conducted the required review of all walkdowns conducted by qualified designees.

1.3 Conclusions

The organizational structure and staffing levels maintained by the licensee during the inspection period met the requirements specified in the license and were sufficient for the work in progress. The licensee’s safety and environmental reviews were performed in accordance with the license requirements. The licensee conducted audits, inspections and program reviews as required by regulatory requirements and the license.

2 In-Situ Leach (ISL) Facilities (89001)

2.1 Inspection Scope

Determine if in-situ recovery activities were conducted in accordance with regulatory requirements and the license.

2.2 Observation and Findings

a. Uranium Recovery

At the time of this inspection, uranium recovery production was being performed at Mine Units 1 and 2. Since the previous inspection in January 2017, the licensee placed Header Houses 7 and 8 into production and has Header House 9 in recirculation mode.

The average daily production for the facility since the previous inspection ranged between 711 and 3,330 gallons per minute (gpm), which is less than the maximum average daily flowrate of 7,500 gpm as stipulated in License Condition 10.2. In accordance with License Condition 10.1, the lixiviant consisted of native groundwater, carbon dioxide, sodium bicarbonate and oxygen.

In Section 3.1.4 of the License Application (referenced in License Condition 9.2), the licensee committed to maintaining a production bleed between 0.50 - 2.00 percent, with an average of 1.25 percent. Since the previous inspection, the monthly average of daily bleed varied between 0.6 – 0.97 percent of the daily production rate. The inspectors determined the long-term daily production bleed, over the inspection period, was in accordance with licensed conditions.

The inspectors reviewed the licensee's swabbing results for both mine units during the maintenance outage. "Swabbing" is the mechanical means of pulling or lifting liquids, in this case water, from a well. With the CPP shutdown and no injection volumes, the licensee was maintaining the inward hydraulic gradient with wellfield swabbing activities. The licensee was drawing approximately 3,000 to 6,000 gallons of swabbing water averaged over both mine units per day between two swabbing rigs. The licensee performed increased monitoring of the monitoring wells for excursions. The inspectors briefly reviewed the monitoring well parameters and levels. The longer term effect on the inward hydraulic gradient will be reviewed at a later date.

The inspectors reviewed the daily pressure records for the injection and recovery wells since the previous inspection. The maximum daily pressure, in documents reviewed by the inspectors, was recorded as 138.84 pounds per square inch. The daily pressures were below the maximum 140 pounds per square inch.

b. Site Tours

The inspectors conducted a site tour of the CPP, selected header houses, retention pond, 11e.(2) storage areas, and deep disposal well house. The tour of the CPP was limited due to the maintenance outage. However, the inspectors reviewed the maintenance work in progress for radiological and safety controls.

The inspectors measured the gamma radiation exposure rates throughout the facility using a Ludlum microRoentgen survey meter (NRC No 015530 calibration due 7/24/2018, calibrated to Ra-226). The highest dose measured in the CPP was 200 microRoentgen per hour ($\mu\text{R/hr}$) near the transfer water tank and transfer water decant tank. No area was identified that met the definition of a radiation area (5.0 millirem in one hour) that was not posted as a radiation area.

The inspectors found that all entrance areas to the facility and wellfields were posted with the words, "Any Area Within This Facility May Contain Radioactive Material", as required by License Condition 9.11.

The inspectors also reviewed the licensee's program for site security, including the use of locked gates, fences, and cameras.

c. Mechanical Integrity Tests

License Condition 10.5 states, in part, the licensee shall perform well integrity tests on each injection and production well before the wells are utilized and on wells that have been serviced with equipment or procedures that could damage the well casing. Additionally, each well shall be retested at least one every five years. The inspectors reviewed documents regarding the mechanical integrity tests of wells since the previous inspection. During the inspection period, there were three failures of 153 wells tested. The wells were repaired and passed retesting.

2.3 Conclusion

The licensee has conducted in-situ recovery and operations in accordance with the license and regulatory requirements. Radiological controls including signs and postings were implemented in accordance with license and regulatory requirements.

3 Radiation Protection (83822)

3.1 Inspection Scope

Determine whether the licensee's radiation protection program was conducted in compliance with the license and 10 CFR Part 20 requirements.

3.2 Observations and Findings

a. Occupational Exposures

The inspectors reviewed the licensee's occupational exposure records for fourth quarter of 2016 and the first two quarters of 2017. Employees were monitored for external exposure using optically stimulated luminescence dosimeters. The highest deep dose equivalent exposure (DDE) reviewed was 25 millirem (0.25 milliSievert) for the fourth quarter 2016, assigned to the RST. The maximum DDE assigned for the first quarter of 2017 was 8 mrem (0.08 milliSievert) for the RST. The highest DDE assigned for the second quarter of 2017 was 2 mrem (0.02 milliSievert) to a production operator.

Based on the dosimetry data for calendar year 2016, which provided dosimetry to all Strata employees, a decision was made to reduce the number of individuals badged from 40 to 16. Individuals who remained on monitoring included: The production operations staff, the radiation safety staff, lab personnel and those individuals who had offices in the CPP.

Internal dose or Committed Effective Dose Equivalent (CEDE) is based on radon monitoring and uranium particulate sampling and bioassay results. No bioassay result was above the action level for investigation, except for the spiked samples. The inspectors determined internal exposures were well below the limits established in 10 CFR 20. The inspectors confirmed the licensee had conducted air sampling at the required intervals. Appropriate exposures were calculated and recorded for each employee.

All doses were below the limits established in 10 CFR 20.1201.

b. Radiation Work Permits

License Condition 10.4 requires the licensee to use Radiation Work Permits for non-routine activities not covered in a standard operating procedure. Since the previous inspection, Radiation Work Permits were issued and involved the inspection and maintenance of various tanks, replacement and installation of various valves, the installation of production and injection line filter canisters, various pump repairs, injection line repair, consolidation of laboratory samples, and fall off testing. The inspectors reviewed the permits and found they included the necessary air sampling and protective equipment requirements for the work being performed.

c. Radiation Safety Instrumentation

The inspectors reviewed the licensee's operability, calibration and maintenance records for survey instruments. The inspectors determined the radioactive sources used for instrument checks included the appropriate range of energies and particles for detection and was adequate for the specified use. Instruments reviewed were found to be in calibration. The licensee uses an offsite vendor to perform annual calibration for radiation safety instrumentation. The inspectors observed survey meters used by licensee personnel when exiting restricted areas. The survey meters examined by the inspectors were found to be in calibration and were used appropriately by licensee's staff.

d. Radiation Protection Surveys

The inspectors reviewed the licensee's routine contamination and gamma radiation surveys. The licensee conducted weekly removable contamination surveys in designated clean areas of the facility, such as lunch rooms and office areas. Monthly gamma radiation surveys were conducted in the CPP, wellfield, and the deep disposal well. Monthly contamination spot checks were conducted on clean trash containers. Monthly contamination surveys were conducted on respirators. Quarterly spot checks were conducted on workers and vehicles. Since the last inspection, two random surveys were performed of the laboratory/bioassay preparation area and a resin trailer. The inspectors verified the surveys were being conducted and documented as required. No

widespread contamination problems or unposted radiation areas were identified by the licensee during these surveys.

The inspectors reviewed a representative sample of free release surveys to ensure compliance with License Condition 9.6 requirements. The records indicated that the release surveys were performed as required to ensure that alpha, beta, and gamma levels were below the action limits.

3.3 Conclusions

The licensee implemented a radiation protection program that met the requirements of 10 CFR Part 20 and the license. Occupational doses were less than established limits.

4 **Effluent Control and Environmental Protection (88045) and Maintaining Effluents from Material Facilities ALARA (87102)**

4.1 Inspection Scope

Determine if the environmental and effluent monitoring programs are adequate to monitor the impacts of site activities on the local environment.

4.2 Observations and Findings

a. Environmental Monitoring

The effluent and environmental monitoring programs and reporting requirements are specified in License Conditions 9.2, 9.10, 10.4(B), 10.9, 11.1(D), 11.2, 11.5, and 12.7. The environmental monitoring program included airborne particulates, radon, direct gamma radiation, surface water, soil, and sediment sampling. Sampling of food and vegetation was not specifically required. The results of the licensee's sampling are presented in semiannual reports to the NRC. The inspectors reviewed the semi-annual report for the second half of 2016 (ML17067A176), as required by 10 CFR 40.65 and License Condition 11.1, and interviewed site staff. The licensee utilized six sample stations including a background and nearest resident station. The licensee discontinued airborne monitoring station South. The sample station removal was processed through the SERP and the monitoring program was updated accordingly. In addition, the license required the licensee to collect certain samples from the CPP, header houses, and wellfield as part of the environmental and effluent monitoring program. In summary, the licensee collected and reported all sample results from the six sampling stations for calendar year 2016.

As part of the effluent monitoring program, the licensee analyzed the production and injection fluid for radon concentrations. The inspectors were unable to review the licensee's sampling protocols to ensure consistent and reliable sample results. This program area will be reviewed during a future inspection, to ensure that the licensee's collection and analysis methods resulted in consistent and reliable information.

b. Dose to Members of the Public

The licensee conducted annual assessments of public doses as required by 10 CFR Part 20. Strata monitored radon around the outside of the CPP at the eight

compass directions using radon track etch detectors. These detectors were exchanged on a quarterly basis and analyzed by a qualified laboratory. In accordance with the approved monitoring program, the average concentration of radon was determined for calendar year 2016 by subtracting the average radon concentration from the background environmental monitoring station (Southwest Station) from each cardinal location. In summary, the average radon concentrations at all eight locations were reflective of background concentrations. Therefore, it is concluded a member of the public was not exposed to detectable concentrations of radon above background near the CPP.

The licensee assumed a member of the public most likely to be near the CPP is a contractor or a delivery person. This individual, based on a conservative occupancy time period near the CPP, would obtain a DDE of 5 mrem for the year. Therefore, for calendar year 2016, the measured and calculated maximum total dose for a member of the public was determined to be 5 mrem for a contractor or delivery person onsite.

c. Wellfield and Excursion Monitoring

The inspectors reviewed data collected under the licensee's excursion monitoring program since the last inspection. License Condition 11.5 requires, in part, that the licensee monitor groundwater at the designated monitoring wells twice a month. Since the previous inspection, the licensee implemented the excursion monitoring program in accordance with the established program. No wells were determined to have been on excursion status since the previous inspection.

During the inspection period, the licensee had no spills of production fluid and 14 spills of injection fluid, three of which met the threshold for reporting to the State of Wyoming (i.e., volume greater than 420 gallons or the spill enters a waterway). Three spills also met the NRC's threshold for reporting. The three spills, dated May 25, 2017 (ML17159A494), July 27, 2017, and August 8, 2017, were reported to the NRC in accordance with License Condition 11.6 requirements. The spills did not pose a hazard and did not require soil excavation. The licensee implemented corrective actions to better limit the movement of spills in the wellfield by enhancing berms, drainage, and catch basin areas.

4.3 Conclusions

The licensee conducted environmental monitoring in accordance with license requirements. The licensee reported the results in semi-annual reports to the NRC. The annual dose to members of the public remained below regulatory limits. The licensee was documenting spills and conducting excursion sampling as specified in the license.

5 Inspection of Transportation Activities (86740) and Radioactive Waste Processing, Handling, Storage and Transportation (88035)

5.1 Inspection Scope

Determine whether the licensee's performance is in accordance with regulations and license commitments for processing, handling, storage and transportation of radioactive materials and waste.

5.2 Observations and Findings

a. Transportation

The inspectors reviewed shipments of resins and 11e.(2) made by the licensee since the previous inspection. The licensee made 16 shipments of resin and five shipments of 11e.(2) waste. The shipping records reviewed appropriately identified the shipment contents (activity, radionuclide, chemical form, UN number, etc.) and correctly classified the material being shipped (exclusive use, LSA-1, Class 7, etc.).

During the inspectors waste shipment records review, the inspectors also reviewed the licensee's corrective actions associated with a previous violation for not having shipping paperwork for the returning waste containers. The licensee is considered the shipper of the returning waste container from the disposal site. The licensee now includes, with the initial shipment of waste, LSA-I, Class 7, UN2912 Natural Uranium shipping paperwork for the returning waste containers. The inspectors determined the returning waste containers' paperwork identified the appropriate contents and was correctly classified. The inspectors did not identify additional instances of a returning waste container without the proper shipping paperwork. The actions taken by the licensee to correct and prevent recurrence close violation VIO 040-09091/2017-002-01.

b. Inspection of Byproduct Waste Storage

The inspectors observed 11e.(2) byproduct material waste stored in a covered roll-off container inside a fenced restricted area adjacent to the CPP. The inspectors noted that the fence was secured with a lock and was appropriately posted. The inspectors performed an ambient gamma radiation survey of the fence line to confirm that the area was appropriately posted and controlled in accordance with 10 CFR 20 regulations.

c. Wastewater Treatment Activities

The licensee processes liquid effluent through reverse osmosis units, stored in storage tanks, or disposed to a deep disposal well or one of four evaporation ponds. The licensee does not release liquids directly into the environment during routine operations. Consistent with License Condition 10.7, the licensee has been disposing of plant and wellfield operation wastewater using deep disposal well (DDW) injection and evaporation ponds. The licensee currently has one operational DDW.

The licensee provided the inspectors with the waste disposal rates recorded since the last inspection. In the first quarter, the licensee had two readings above the maximum injection rate of 100 gpm. On January 6, 2017, due to a power failure, the deep disposal well injection meter recorded a maximum injection rate of 100 gpm when the meter came back online. Power was lost in the CPP and communications to the deep disposal well was interrupted. In addition, on March 6, 2017, the deep disposal well injection meter recorded a maximum injection rate of 100 gpm due to work being completed on the meter. In both cases, the 100 gpm values were omitted and the next highest reading were reported; 52 gpm and 61 gpm respectively. In the second quarter, in June, the site lost power due to lightning which resulted in a recorded maximum injection rate of 100 gpm, when the flow meter came back online. The next highest recorded maximum injection rate was 57 gpm. For the inspection period, the maximum injection pressures were maintained below the maximum limit of 1,000 pounds per square inch.

License Condition 10.8 states, in part, routine pond inspections will be conducted and include daily, weekly, monthly, quarterly, and annual inspections. The inspectors toured the pond area and inspected the condition of the ponds, leak detection instrumentation, and the freeboard level. The inspectors also reviewed selected pond inspection documentation for compliance to license requirements with no issues identified.

5.3 Conclusions

The licensee's performance is in accordance with regulations and license commitments for processing, handling, storage and transportation of radioactive materials and waste.

6 Emergency Preparedness (88050) and Fire Protection (88055)

6.1 Inspection Scope

Determine if emergency Preparedness and Fire Protection Program activities were conducted in accordance with the licensee's operating procedures.

6.2 Observations and Findings

a. Emergency Preparedness

The inspectors reviewed the licensee's established procedures for responding to and reporting emergencies, non-routine spills, and transportation incidents. The licensee established agreements with local emergency response agencies, including the fire department, local law enforcement agencies, and local hospitals. The inspectors reviewed records for community meetings with various response agencies since the last inspection of this area. In addition, the inspectors reviewed two onsite medical events with local emergency response agency engagement since the last inspection of this area. The licensee captured lessons learned and updated procedures and contacts as appropriate.

Based on the inspectors' review, the licensee was implementing and maintaining an Emergency Response Program consistent with its license conditions and operating procedures.

b. Fire Protection

The inspectors reviewed the licensee's established procedures and facility systems and equipment for the effectiveness of combustible material and ignition control, operability and maintenance of fire suppression equipment and systems, and fire drill performance.

The licensee maintains facility and personnel readiness with fire drills and evacuation drills. The management of combustible material is managed through housekeeping and appointed storage lockers. Ignition sources are managed through a Hot Permit process for any work which might generate a spark, such as welding, grinding, etc. During the maintenance outage, the inspectors observed the implementation of this permitting process. The licensee has established procedures for the maintenance and testing of

fire extinguishers. The inspectors noted those fire extinguishers reviewed were properly maintained and tested.

Based on the inspectors' review, the licensee was implementing and maintaining a Fire Protection Program.

6.3 Conclusions

The licensee was implementing and maintaining an Emergency Response and Fire Protection Program consistent with its license conditions and operating procedures.

7 **Exit Meeting Summary**

The NRC inspectors presented the inspection findings to the licensee's representatives at the conclusion of the onsite inspection on August 31, 2017. During the inspection, the licensee did not identify any information reviewed by the NRC as proprietary that was included in this report.

SUPPLEMENTAL INSPECTION INFORMATION

PARTIAL LIST OF PERSONS CONTACTED

Licensee Personnel

M. Griffin, Vice President PREC
J. Kukuchka, Controller
S. Cherry, GIS Database Coordinator
C. Harless, Radiation Safety Technician
J. Durand, Operations Superintendent
R. Pond, Manager HSE and RSO
J. Douthit, Vice President, Operations

Items Opened, Closed and Discussed

Opened

None

Closed

VIO	040-09091/2017-002-01	Return shipping papers for 11.e(2) containers were not prepared.
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Discussed

None

Inspection Procedures

IP 86740	Inspection of Transportation Activities
IP 88005	Management Organization and Control
IP 89001	In-Situ Leach (ISL) Facilities
IP 83822	Radiation Protection
IP 88045	Effluent Control and Environmental Protection
IP 87102	Maintaining Effluents from Materials Facilities ALARA
IP 88035	Radioactive Waste Processing, Handling, Storage and Transportation
IP 88050	Emergency Preparedness
IP 88055	Fire Protection

List of Acronyms

ADAMS	Agencywide Documents Access and Management System
ALARA	As Low As is Reasonably Achievable
CFR	Code of Federal Regulations
CEDE	Committed Effective Dose Equivalent
CPP	Central Processing Plant
DDE	Deep Dose Equivalent
DDW	Deep Disposal Well
gpm	Gallons Per Minute
mrem	Millirem
$\mu\text{R/hr}$	microRoentgen per hour
NCV	Non-cited Violation
NRC	U.S. Nuclear Regulatory Commission
RSO	Radiation Safety Officer
RST	Radiation Safety Technician
RWP	Radiation Work Permit
SERP	Safety and Environmental Review Panel
TEDE	Total Effective Dose Equivalent

NRC INSPECTION REPORT 040-09091/2017-003 STRATA ROSS –
 DATED September 21, 2017.

DISTRIBUTION:

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 B. VonTill, NMSS/DUWP/URLB
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 R4DNMS_FCDB

ADAMS ACCESSION NUMBER: ML17264A428

<input checked="" type="checkbox"/> SUNSI Review By:	ADAMS <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input checked="" type="checkbox"/> Non-Sensitive <input type="checkbox"/> Sensitive	<input checked="" type="checkbox"/> Publicly Available <input type="checkbox"/> Non-Publicly Available	Keyword: NRC-002
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