Technical Review Acceptance Table

| Chapter 1 – Proposed Activities | | |
|---|---------|--|
| Section – Criteria | Present | Location in report |
| (1a) Corporate entities | yes | Page 1-2 |
| (1b) Location (county, state, and facility name) | yes | Sections 1.4, 2.1 |
| (1c) Land ownership | yes | Section 1.5 |
| (1d) Ore-body locations and estimated U ₃ 0 ₈ content | yes | Section 1.6 |
| (1e) Proposed solution extraction method and recovery process | yes | Section 1.8 |
| (1f) Operating plans, design throughput, and annual $U_3 \\ 0_8$ production | yes | Section 1.7, 1.9 |
| (1g) Estimated schedules for construction, startup, and duration of operations | yes | Section 1.10, Fig 1-4 |
| (1h) Plans for project waste management and disposal | yes | Section 1.11 |
| (1i) Plans for ground-water quality restoration, decommissioning, and land reclamation | yes | Sections 1.12, 1.13, 6.1-6.4 |
| (1j) Surety arrangements for facility decommissioning, ground-water restoration, and site reclamation | yes | Sections 1.13, 1.14, 6.6, Appendix E |

| Chapter 2 – Site Characterization | | |
|--|---------|-----------------------------------|
| Section - Criteria | Present | Location in report |
| 2.1 Site Location and Layout | | |
| (1) Maps | | |
| well fields | yes | Section 3.1.5 Figures 3-3, 3-4 |
| surface impoundments | yes | Section 3.0, Figure 3-3, 3-4 |
| diversion channels | no | |
| proposed monitoring wells (not identified in Legend) | yes | Section 3.0, Figure 3-5 |

| deep injection wells | no | |
|--|-----|--|
| recovery plant buildings | yes | Section 3.0, Figure 3-1 |
| (2) Previous maps | NA | |
| (3) Maps of exclusion area boundaries and fences | yes | Section 2.1 Figure 2.1-1 |
| (4) Maps of applicant property and leases and current adjacent properties | yes | Section 1, Section 2-2 Figure 2.2-2 |
| (5) Maps of nearby population centers and transportation links | yes | Section 2.2 Figure 2.2-1 |
| (6) Topographic map of drainage basins and variations in drainage gradient in vicinity of proposed ISL facility | yes | Section 2.2, 2.7 Figures 2.2-4, 2.7.2 |
| (7) Proposed ISL is clearly labeled at a scale appropriate to the area being covered (regional and local) with sufficient clarity | yes | Figure 2.1-1, Figure 2.2-1 |
| (8) Data sources are documented | yes | Section 2.2 |
| (9) Maps include designation of scale, orientation and geographic coordinates | yes | All maps |
| 2.2 Uses of Adjacent lands and Waters | | |
| (1a) Surrounding land and water usesmap with residences, and ground-water supply wells, and abandoned wells | yes | Figure 2.2-2, Figure 2.2-9 |
| (1b) present and projected (life of facility) water use with methodology/sources of information | yes | Sections 2.2.3, 3.1.6 |
| (1c) present and projected water use (surface and ground) including withdrawal with methodology / sources of information | yes | Tables 2.2-7, 2.2-9 |
| (1d) ground water well info (depth, elevations, flow rates, drawdown, and description of producing aquifers | yes | Figure 2.2-9 (incomplete) |
| (1e) location of abandoned drill holes (depth, type of use, condition at closing, plugging procedure, date of completion) | yes | Section 2.2.3, 2.6 Figures 2.2-9, 2.6-34 thru 2.6-47 |
| (1f) nature and extent of projected land use with methodology/sources of information | no | |
| (1g) location of all nuclear fuel cell facilities located or proposed within 50-mile radius | yes | Figure 2.2-3, Table 2.2-6 |
| (2) Human residences, nearest site boundary(ies) to residences, surface and ground-water use, and projected water use for each 221/2-degree sectors centered on the 16 cardinal compass points | | Figure 2.2-2 |

| (3) Data source documentation | | |
|--|-----|------------------------------------|
| (4) Maps include designation of scale, orientation and geographic coordinates | yes | |
| 2.3 Population Distribution | | |
| (1) Population data including demographic information on minority and low-income populations | yes | Section 2.3.4 |
| (2) Map of suitable scale, populations centers within 50 mile radius | yes | Figure 2.3-1 |
| (3) Map with concentric 1, 2, 3, 4, 5, 10, 20 30, 40, 50, 60, 70 and 80 km divided into 221/2-degree sectors centered on the 16 cardinal compass points with population totals | yes | Figure 2.3-1 Section 2.3.1.6 |
| (4) Significant population and visitor statistics of neighboring schools, plants, hospitals, sports facilities, residential areas, parks, and forests within 2 miles of proposed ISL (identify data sources) | yes | Section 2.3.1.4 Section 2.3.1.5 |
| (5) Projections of population, visitor, and food production data for life of ISL | yes | Section 2.3.1.3 Table 2.3-3 |
| (6) Methodology and sources for projections | yes | Section 2.3.1.3 |
| 2.4 Historic, Scenic, and Cultural Resources | | |
| (1) Listing of properties included or eligible for National Register (National Landmarks) | yes | Section 2.4.1 |
| (2) Map showing all National Register Properties and Landmarks with respect to facilities | no | |
| (3) Discussions of treatment of areas of historic, scenic, and cultural significance following prescribed guidance. | no | |
| (4) If delegated by NRC, evidence of contact with state historical preservation and tribal authorities. | no | |
| (5) If delegated by NRC, memorandum of agreement with state historical preservation and tribal authorities. | no | |
| (6) Letter from state historical preservation officer | no | |
| (7) Aesthetic and scenic quality of the site rated in accordance with US Bureau of Land Management 8400 | yes | Section 2.4.2.4 |
| 2.5 Meteorology | | |
| (1) Description of general climate, local and regional based on appropriate data sources precipitation, evaporation | yes | Section 2.5.3 |

| - Joint-frequency distribution (wind speed and direction, stability class, period of record, height of data) | yes | Section 2.5.3.2 Section 2.5.3.3 |
|--|---------------|--|
| - Average inversion height | yes | Section 2.5.3.4 |
| - Diurnal and monthly averages of temp and humidity | yes | Section 2.5.3.1 |
| - Station locations and height | yes | Section 2.5.2 |
| - Minimum of one full year of joint frequency data | yes | Section 2.5.3.1 |
| On-site program designed IAW Regulatory Guide 3.63, "Onsite Meteorological Measurement Program for Uranium Recovery Facilities—Data Acquisition and Reporting" (NRC, 1988) | no | Section 2.5.1 |
| (2) Regional weather patterns and local meteorological conditions based on weather station data/on-site monitoring Local severe weather Information on anticipated air quality impacts from non-radiological sources | yes | Section 2.5.2. |
| (3) Meteorological data used for assessing impacts are substantiate as being representative of expected long-term conditions | yes and no | Section 2.5.3.3 |
| (4) Description of existing air quality (ISL air quality impacts are indistinguishable from background - radiological and non-radiological | no | |
| (5) Meteorological and air quality data are documented in open file or other reports | yes | Section 2.5.3.6 |
| 2.6 Geology and Seismology | | |
| (1) Description of local and regional geology | yes | Sections 2.6.1, 2.6.2 |
| (1a) surface sampling and descriptions | yes | Sections 2.6.2, 2.6.3 |
| (1b) cutting and core logging reports | no | |
| (1c) wireline geophysical logs | yes | Section 2.6.2, Figures 2.6-3 to 2.6-16 |
| (1d) geologic interpretations of surface geology and balanced cross sections (i) Maps (ii) Cross sections through ore deposit roughly perpendicular and parallel to the principal ore trend (iii) Fence diagrams showing stratigraphic correlations | yes | Section 2.6.2, CSX: Figures 2.6.3 to 2.6-16 Isopachs: Figures 2.6- 18 to 2.6-32 |
| (2) Maps of sufficient scale and resolution showing intended geological information and features | no | Section 2.6.1 and 2.6.2 (wrong scale) |
| (3) In local stratigraphic section, all important | yes | Section 2.6.2, |
| | | |

| units/zones are clearly marked | | Figure 2.6-1 |
|--|-----|---|
| (4) Geological and geochemical description of mineralized zone and geological units immediately surrounding the zone is provided | yes | Section 2.6.2 |
| (5) Inventory of economically significant mineral and energy-related deposits, in addition to uranium, is included (well abandonment and plugging issue) | yes | Section 2.2 |
| (6) Description of local and regional geologic structure including folds and faults | yes | Section 2.6.2, Figure 2.6-18 and 2.6-32 |
| (7) Discussion of seismicity & seismic history of region | yes | Section 2.6.6 |
| (8) Generalized stratigraphic column | yes | Figure 2.6-1, Figure 2.7-1 |
| (9) Sources of all geological and seismological data are documented | yes | Section 2.6.7 |
| (10) Proper map scale and orientation shown | yes | |
| (11) Short-term seismic stability has been demonstrated for ISL in accordance with Regulatory Guide 3.11, Section 2.6 (NRC, 1977) | yes | Section 2.6.6 |
| (12) General description of site soils and their properties (i.e., impact on construction and operation on erosion) | yes | Section 2.6.5 |
| (13) Description of site soils and their properties where land application of water is anticipated | NA | |
| 2.7 Hydrology | | |
| (1) Characterized surface-water bodies and drainage within licensed area (maps providing relevant information) | yes | Section 2.7.1 Figures 2.7-1 and 2.7-2 |
| (2) Assessment for the potential for flooding and erosion that could affect ISL facilities Modeling, if needed. | yes | Section 2.7.1 Figures 2.7-6, 2.7-7, 2.7-8 |
| (3) Local and regional hydraulic gradient and hydrostratigraphy | yes | Section 2.7.2 |
| potentiometric maps (local and regional) | | Figures 2.7-10; Figures 2.7-13 to 2.7-17 |
| Hydraulic parameters | | Section 2.7.2.4 |
| (4) Reasonably comprehensive chemical and radiochemical analysis of water samples within and outside mineralized zones | yes | Section 2.7.3.1 and 2.7.3.2 |
| Four seasonably variable sampling events | | |

| (5) Seasonable/historical variability in potentiometric head | no | |
|---|--------|---|
| (6) Past, current, and future ground water use | yes | Section 2.2.3 Addendum 2.7 |
| 2.8 Ecology | | |
| (1) Inventories of terrestrial and aquatic species | NA | |
| (2) Inventories of locally significant domestic flora and fauna (cattle, sheep, etc.) | NA | |
| (3) Identified endangered species | NA | |
| (4) Description of species-environment relationships within radius of expected impacts | NA | |
| (5) All sources or ecological information are documented | NA | |
| 2.9 Background Radiological Characteristics | | |
| (1) Monitoring programs to establish background radiological characteristics IAW Regulatory Guide 4.14, Revision 1, Section 1.1, collected at least 12 consecutive months | yes/no | Section 2.9.2 -2.9.10 Section 2.9.2 Section 2.9.4 Section 2.9.11 |
| (2) Soil sampling is conducted at both 5-cm and 15-cm depths for background decommissioning data | yes | Section 2.9.3 |
| 2.10 Other Environmental Features | | |
| Background Non-Radiological Characteristics | | |

| Chapter 3 – Description of Proposed Facility | | |
|---|---------|-------------------------------------|
| Section - Criteria | Present | Location in report |
| 3.1 In Situ Leaching Process and Equipment | | |
| (1) Sufficiently detailed discussion of mineralized zone(s), aerial extent and approximate thickness with U ₃ O ₈ grade | yes/no | Section 3.1.1 |
| (2a) Well design and construction - injection and recovery wells | yes | Section 3.1.3, Figure 3 -2 |
| (2a) Well design and construction - monitor wells | yes | Section 3.1.3, Figure 3 -2 |
| (2b) Well integrity testing - injection and recovery wells | yes | Section 3.1.3.4 |
| (3) Number, location and screened intervals of excursion monitoring wells | yes/no | Section 3.1.4, 3.1.4.1 (incomplete) |
| (4) Methods for timely detection and cleanup of leaks | yes | Section 3.3.1 |

| Chapter 3 – Description of Proposed Facility | | |
|--|---------|--|
| Section - Criteria | Present | Location in report |
| from surface and near-surface pipes within well fields | | |
| (5a) Description of ISL process - projected down-hole injection pressures with the hydrostatic pressure of the fluid column (avoid hydrofracturing in aquifer) | yes/no | Section 3.1.5 |
| (5b) Overall production rates should be higher than injection rates | yes | Section 3.1.4, 3.1.5.3, 3.1.6.1 |
| (5c) Proposed plant material balances and flow rates should be acceptably described | yes | Section 3.1.6.1, Figures 3-6 and 3-7; |
| (5d) Lixiviant makeup | yes | Section 3.1.4 |
| (5e) Description/identification of gaseous, liquid, and solid wastes and effluents generated | yes | Sections 3.3.3, 3.3.5, 4.1.2 |
| (5f) Effects of ISL are likely to have on surrounding water users | yes/no | Sections 3.1.6.1, 7.2.5.1 (incomplete) |
| (5fi) Ability to control lixiviant from the production zones to surrounding environs | no | |
| (5fii) Ground-water and surface water pathways that might transport solutions off-site in event of uncontrolled excursion | no | |
| (5fiii) Impact of ISL operations on ground-water flow patterns and aquifer levels | no | |
| (5fiv) Expected post-extraction impact on geochemical properties and water quality | yes | Section 6.1.2 Table 6-2 |
| (6) Proposed operating plans and schedules including timetables for well field operation, surface reclamation, and ground-water restoration | yes | Section 3.2.3, Figure 3-10 |
| (7) Analysis of flood and flood velocities | yes | Section 2.7.1 |
| (8) Design of diversion channels | yes | Section 3.5.3 |
| (9) Review plans, specifications, inspection programs, and quality assurance/quality control | no | |
| (10) Results from other production areas | NA | |
| (11) Approved waste disposal agreement for 11e.(2) byproduct materials disposal. | no | |
| 3.2 Recovery Plant, Satellite Processing Facilities, Well Fields, and Chemical Storage Facilities - Equipment Used and Materials Processed | | |
| Note: Smith Ranch Central Processing Plant (CPP) | | |

| Chapter 3 – Description of Proposed Facility | | |
|---|---------|------------------------------|
| Section - Criteria | Present | Location in report |
| is currently licensed | | |
| (1) Application provides diagrams showing the proposed (or existing) plant/facilities layout in adequate detail | yes | Figure 3-8 |
| (2) Areas were dust, fumes, or gases would be generated are clearly identified, along with a description of the source of the emissions | yes | Section 5.7.1.1 |
| (3) All ventilation, filtration, confinement, dust collection and radiation monitoring equipment are described as to size, type, and location | yes | Section 4.1.2.1 |
| (4) Availability requirements for safety equipment are adequately stated, and measures for ensuring availability and reliability are clearly identified | no | |
| (5) Specifications, quantities, locations, and operating conditions such as flow rates, temperatures, and pressures of radioactive materials and those hazardous materials with the potential to impact radiological safety, are clearly identified | no | Section 3.2.2 (incomplete) |
| (6) List of applicable federal, state, and local regulations that licensee intends to use to ensure that process chemicals having the potential to impact radiological safety are safely handled | yes | Section 3.2.2 |
| (7) Controls used for eliminating or mitigating the hazards presented by the radioactive materials and those hazardous materials with the potential to impact radiological safety, are adequately described | no | |
| 3.3 Instrumentation and Control | | |
| (1) Instrumentation has been described for various components of the processing facility, including well fields, well field houses, trunk lines, production circuit, surface impoundments, and deep injection disposal wells | yes | Sections 3.3.1, 3.3.2, 3.3.3 |
| (2) Instrumentation is designed to allow the plant operator to continuously monitor and control a variety of systems and parameters, including total flow into the plant, total waste flow leaving the plant, tank levels, and yellowcake dryer | yes | Sections 3.3.2 |
| (3) Control components of the systems are equipped with backup systems that activate in the event of a failure of the operating system | yes | Sections 3.3.1 |
| (4) Well field operating pressures are kept below casing | | |

| Chapter 3 – Description of Proposed Facility | | |
|--|---------|--------------------|
| Section - Criteria | Present | Location in report |
| and formation rupture pressures to prevent vertical excursions. Operation pressure are routinely monitored | yes | Sections 3.1.3.4 |
| (5) Manufacturer's recommendations for maintenance and operation of yellowcake dryers, and checking and logging requirements contained in 10 CFR Part 40, Appendix A, Criterion 8 are followed | NA | |

| Chapter 4 – Effluent Control System | | |
|---|---------------|--------------------------|
| Section - Criteria | Present | Location in report |
| 4.1 Gaseous and Airborne Particulates | | |
| (1) Monitoring and control systems are located to optimize their intended function | no and yes | Section 4.1.1 |
| (2) Monitoring and control systems are appropriate for the types of effluents generated | no and yes | Section 4.1.1 |
| (3) Provides a demonstration that adequate ventilation systems are planned for the process building to avoid radon gas buildup. (Consistent with Reg Guide 8.31) (i) recovery solutions entering the plant (ii) extraction process (where tanks are vented) (iii) uranium particulate emissions resulting from drying and packing operations and spills | yes | Sections 4.1.1 and 4.1.2 |
| (4) Demonstrates that the effluent control systems will limit exposures under both normal and accident conditions | no | Section 4.1.1 and 4.1.2 |
| (5) Demonstrates that the operations will be conducted so that all airborne effluent releases are as low as reasonably achievable | no | |
| 4.2 Liquids and Solids | | |
| (1) Common liquid effluents generated from the process bleed, process solutions, wash-down water, well development water, pumping test water, and restoration waters are properly controlled | yes and no | Section 4.2.1 |
| On-site land applications (i) description of waste physical/chemical properties (ii) description of the proposed manner and condition of waste disposal (iii) analysis/evaluation of pertinent information on | NA | |

| Chapter 4 – Effluent Control System | | |
|---|---------|---------------------------------------|
| Section - Criteria | Present | Location in report |
| affected environment | | |
| (iv) information on nature and location of other facilities likely to be affected | | |
| (v) analyses and procedures to ensure that doses are maintained as low as is reasonably achievable | | |
| For land applications | | |
| (i) concentrations of radioactive contaminants in soils to show that levels of radium and other nuclides in the soil will not exceed the standard in 10 CFR part 40, Appendix A | | |
| (ii) impacts to ground-water and surface-water quality(iii) impacts on land use, particularly crops and vegetation | NA | |
| (iv) exposures and health risks that may be associated with radioactive constituents reaching the food chain. Doses and risks conform to 10 CFR part 20 | | |
| (2) On-site evaporation systems are designed and operated in a manner that prevents migration of waste from the evaporation system to the subsurface monitoring and inspection programs | | |
| Actions to be taken if surface impoundment water analysis indicates leaking | yes | Section 4.2.4.4 Addendum 4-A |
| (i) notify NRC with 48 hours | | Section 5.3.1.1 |
| (ii) analyze standpipe water quality samples for leak parameters for specified period | | |
| (iii) file written report with NRC within 30 days of first notification | | |
| (3) Design, installation and operation of surface impoundments used to manage 11e.(2) byproduct material meet relevant guidance provided in Regulatory Guide 3.11, Section 1 | | |
| Inspections consistent with Regulatory Guide 3.11.1 | | |
| Sufficient capacity and designed, constructed, maintained, and operated to prevent overtopping during (i) normal or abnormal operations, overfilling, wind and wave action, rainfall, or run-on | yes | Sections 4.2.3, 5.3.1 Addendum 4-A |
| (ii) malfunctions of level controllers, alarms, and other equipment | | |
| (iii) human error | | |
| (4) Design of surface impoundment used to manage 11e.(2) byproduct material meets or exceeds the | yes | Addendum 4-A |

| Chapter 4 – Effluent Control System | | |
|--|---------|------------------------------|
| Section - Criteria | Present | Location in report |
| requirements in 10 CFR Part 40, Appendix A, Criterion 5(A) | | |
| Design details, drawings, and pertinent analysis should be provided | | |
| Tests should show that liner will not deteriorate when subjected to the waste products and expected atmospheric and temperature conditions | | |
| Quality control program for installation components Protection features to prevent damage to impoundments components | | |
| - Leak detection system | | |
| - Inspections | | |
| (5) Plans and procedures are provided for addressing contingencies for all reasonably expected system failures | | |
| (a) listing of likely consequences of any failures in process or well field equipment | | |
| (b) identification of appropriate plant and corporate personnel to be notified | | |
| (c) measures for quickly containing and mitigating the impacts of released materials | no | |
| (d) provisions for issuing radiation work permits for workers to mitigate impacts | | |
| (e) specific procedures for complying with notification requirements in the regulations | | |
| (6) Contains a description of the methods to be used for disposing of contaminated solid wastes that are generated during the operation of the facility Applicant has an approved waste disposal agreement for 11e.(2) byproduct materials disposal at an NRC or NRC Agreement State licensed disposal facility | no | Section 4.2.3 (no agreement) |
| (7) Water quality certification and discharge permits have been obtained, or plans are in place to obtain them. | NA | Section 4.2 |
| (8) Acceptable methods for effluent disposal by release to surface water, evaporation from surface impoundments, land application, and deep well injection | yes | Section 4.2 |

| Chapter 4 – Effluent Control System | | |
|---|---------|-------------------------|
| Section - Criteria | Present | Location in report |
| are consistent with NRC guidance | | |
| (9) Alternatives to liquid management activities have been considered and none is found to be obviously superior to the selected option | yes | Sections 4.2.4.4, 8.1.7 |
| 4.3 Contaminated Equipment | yes | Section 4.2.3 |

| Chapter 5 - operations | | |
|---|---------------|---|
| Section - Criteria | Present | Location in report |
| 5.1 Corporate Organization and Admin procedures | | |
| (1) Adequate descriptions of corporate organization | | |
| Radiation safety officer - responsibilities and authority outlined in Reg Guide 8.31, Sec. 1.2 | yes | Section 5.1 |
| (2) Organizational structure shows integration among groups that support the operation and maintenance of the facility | yes and no | Figure 5-2 |
| (3) Established Safety and Environmental Review Panel (at least three members with appropriate expertise) | yes | Section 5.2.4 |
| (4) Proposed administrative procedures conform with Regulatory Guide 8.2 and Regulatory Guide 4.15 Covers 10 CFR 20.1101 10 CFR 40.32(b), (c) and (d) | yes | Section 5.7.10 & Addendum 5-A (QA Plan) |
| (5) Sufficient independence is available to the plant supervisor, radiation safety officer, and Safety and Environmental Review Panel | yes | Sections 5.1.6; 5.1.7; and 5.2.4 |
| 5.2 Management Control Program | | |
| (1) Proposed management control program is sufficient to assure that all proposed activities that may affect health, safety, and the environment, including compliance with any license commitments or conditions, will be conducted in accordance with written operating procedures 10 CFR 40.60 - Reporting Requirements | yes | Sections 5.2.1, 5.2.3, 5.2.5, 5.1.10 |

| Chapter 5 - operations | | |
|--|---------|--------------------|
| Section - Criteria | Present | Location in report |
| 10 CFR 20, Subpart M - Reports/Notification of Incidents | | |
| (2) Provides a process that will be used to identify and prepare operating procedures for routine work. Development, approval, and review (annual) of SOPs by radiation safety staff | yes | Section 5.2.1 |
| 3) Presents methods for review and approval of non- routine work or maintenance activity by the radiation safety staff | yes | Section 5.2.2 |
| (4) Provides for the establishment of a Safety and Environmental Review Panel and associated records/reports | yes | Section 5.2.4 |
| (5) Exempted from requirements of 20 CFR 1902(e) for areas within facility provided proper signs are conspicuously posted | yes | Section 5.2.6 |
| (6) Licensee has agreed to administer a cultural resources inventory before engaging in any development activity not previously assessed by NRC | yes | Section 5.2.7 |
| (7) Record keeping and retention plans maintained and retained for receipt, transfer, and disposal of any source or byproduct material processed or produced by licensed facility for period set out in license conditions | yes | Section 5.2.3 |
| Permanently maintained and retained until license termination: (8a) Records of on-site radioactive disposal such as by deep well injection, land application, or burial under 10 CFR 20.2002 and 20.2007 | yes | Section 5.2.3 |
| (8b) Records required by 10 CFR 20 Subpart L specifically 10 CFR 20.2103(b)(4) | yes | Section 5.2.3 |
| Section 5.2.3 (8c) | | |
| 10 CFR 40, Appendix A, Criteria 8 and 8A Criterion 8Milling operations Criterion 8ADaily inspections of tailings or waste | no | |
| retention systems | no | |
| Regulatory Guide 3.11.1 - Operational Inspection and Surveillance of Embankment Retention Systems for Uranium Mill Tailings (Rev. 1, ML003740229) | no | |
| Section 5.2.3 (8d)(i) – descriptions of spills, excursions, contamination events or unusual occurrences | yes | Section 5.2.3 |

| Chapter 5 - operations | | |
|---|---------------|--------------------|
| Section - Criteria | Present | Location in report |
| Section 5.2.3 (8d)(ii) – info of site characterization, residual soil contamination, hydro, geo, surface impoundments, ponds, lagoons, and well field aquifer anomalies | yes | Section 5.2.3 |
| Section 5.2.3 (8d)(iii) – as built drawings of structures, equipment, well fields, modifications | yes | Section 5.2.3 |
| Section 5.2.3 (8d)(iv) – drawings of buried pipes or pipelines | yes | Section 5.2.3 |
| Section 5.2.3 (8d)(v) – preoperational background radiation levels | yes | Section 5.2.3 |
| (9) Licensee demonstrates that records can be provided to a new owner or new licensee or licensee in the event that the property or license is transferred or to NRC after license termination | yes | Section 5.2.3 |
| (10) New licensees or owners demonstrate that any such records received from a previous owner or licensee will be retained or turned over to NRC after license termination | yes | Section 5.2.3 |
| (11) Records will be maintained as hard copy originals, as copies on microfiche, or electronically protected | yes | Section 5.2.3 |
| (12) Reports of spills, evaporation pond leaks, excursions of source, 11e.(2) byproduct material will be made to Headquarters Project Manager within 48 hours of the event. Written notice within 30 days of notification | yes | Section 5.1.10 |
| (13) Annual report will be submitted to the NRC that includes the as low as is achievable audit report, land use survey, monitoring data, corrective action program report, one of the semiannual effluent and environmental monitoring reports, and the Safety and Environmental Review Panel (SERP) information | yes | Section 5.2.5.2 |
| 5.3 Management Audit and Inspection Program | | |
| The proposed frequencies, types, and scopes of reviews and inspections, action levels, and corrective action measures are acceptable to implement the proposed controls (see Regulatory Guides 3.11, 3.11.1, and 8.31). ALARA Policy | yes and no | Section 5.3 |
| 5.4 Qualifications for Personnel Conducting the Radia | tion Safety | Program |
| Personnel meet minimum qualifications and experience for radiation safety staff that are consistent with requirements in Regulatory Guide 8.31, Section 2.3 | | |

| Chapter 5 - operations | | |
|--|---------|------------------------------|
| Section - Criteria | Present | Location in report |
| 5.5 Radiation Safety Training | | |
| (1) Consistent with the approach described in Regulatory Guide 8.31, Section 2.5 | | |
| (2) Consistent with Regulatory Guide 8.13 | | |
| (3) Consistent with Regulatory Guide 8.29 | | |
| 5.6 Security program – Passive and Active controls | yes | Section 5.6 |
| 5.7 Radiation Safety Controls and Monitoring | | |
| 5.7.1 Effluent Control Techniques | | |
| (1) Radon gas from processing tanks within enclosed buildings is properly controlled | yes | Section 5.7.1 |
| (2) Emissions from yellowcake drying operations are properly controlled | NA | |
| Release of liquids into surface waters must comply with the public dose limits in 10 CFR 20.1301, which must be demonstrated by one of the following methods: (3a) The licensee demonstrates compliance with 10 CFR Part 20, Appendix B (i) Showing that the discharge of effluent from any surface impoundment is within 10 CFR part 20, Appendix B, limits at the point of discharge (ii) Monitoring the incoming process water to demonstrate compliance with the effluent discharge requirements of 10 CFR Part 20, Appendix B for process water (3b) The licensee demonstrates that the total effective dose equivalent to the individual likely to receive the highest dose from the facility does not exceed the annual dose limit for the public | no | Section 5.7.1.2 (incomplete) |
| (4) The applicant describes minimum performance specifications for the operation of the effluent controls and the frequencies of tests and inspections to ensure proper performance to specifications | no | Section 5.7.1.1 (incomplete) |
| (5) Record keeping for the effluent control techniques is sufficient to meet requirements in 10 CFR 20.2103(b)(4) | no | |
| (6) The applicant describes emergency procedures in the event of equipment failures or spills, references existing emergency procedures, or commits to the development of emergency procedures | no | |
| (7) The effluent control techniques are designed to keep | yes | |

| Chapter 5 - operations | | |
|--|---------|-----------------------|
| Section - Criteria | Present | Location in report |
| exposures to members of the public as low as is reasonably achievable as described in Regulatory Guide 8.37, Section 2 | | |
| (8) The effluent control techniques are designed to limit exposures to members of the public from emissions to air (excluding Radon-222 and progeny) to no greater than 0.1 mSv (10 mrem/yr) | no | |
| 5.7.2 External Radiation Exposure Monitoring Program | | |
| (1) The application contains one or more drawings that depict the facility layout and the location of monitors for external radiation. (Regulatory Guide 4.14, Section 1.1.5 and 2.1.6) | yes | Section 5.7.2 |
| (2) The application provides criteria to be used in establishing which employees are to receive external exposure monitoring. (Regulatory Guide 8.34) | yes | Section 5.7.2.2 |
| (3) Monitoring equipment is identified by type, sensitivity, calibration methods and frequency, availability, and planned use to protect health and safety | yes | Sections 5.7.1, 5.7.2 |
| (4) All monitoring equipment has a lower limit of detection that allows measurement of 10 percent of the applicable limits (Regulatory Guide 8.3) | yes | Section 5.7.1 |
| (5) Plans for documentation of radiation dose levels for corrective action that are consistent with 10 CFR Part 20 | yes | Section 5.7.2 |
| (6) Application presents radiation dose levels for corrective action that are consistent with 10 CFR Part 20 | no | |
| (7) Radiation doses will be kept as low as is reasonably achievable by following Regulatory Guide 8.10 1a, 1c, 1e and 1f, 1b, 1d, Regulatory Guide 8.31 | no | |
| (8) The applicant monitoring program is adequate to protect workers from hazards of beta radiation resulting form the decay products of uranium-238 when effective shielding is not present | NA | |
| (9) The monitoring program is sufficient to detect and control gamma radiation from uranium decay products in areas where large volumes of uranium may be present and is consistent with Regulatory Guide 8.30 | yes | Section 5.7.2.1 |
| (10) The program for external exposure monitoring and determining doses from external exposure is consistent with Regulatory Guide 8.34, Section C | yes | Section 5.7.2.2 |

| Chapter 5 - operations | | |
|---|---------|--------------------|
| Section - Criteria | Present | Location in report |
| 5.7.3 Airborne Radiation Monitoring Program | | |
| (1) The applicant provides one or more drawings that depict the facility layout and the location of samplers for airborne radiation (Regulatory Guide 8.3) | yes | Section 5.7.3.2 |
| (2) Monitoring equipment is identified by type, sensitivity, calibration methods and frequency, availability and planned use to accurately measure concentrations of airborne radioactive species. | yes | Section 5.7.3.2 |
| (3) Planned surveys of airborne radiation are consistent with the guidance in Regulatory Guide 8.3 | yes | Section 5.7.3.2 |
| (4) The proposed monitoring program is sufficient to adequately protect workers from radon gas releases from venting of processing tanks and from yellowcake dust from drying operations, spills, and maintenance activities (Regulatory Guide 4.14, Sections 1.1 and 2.1 and Regulatory Guide 8.3) | yes | Section 5.7.3.3 |
| (5) Plans for documentation of radiation exposures are consistent with the requirements in 10 CFR 20.2102, 20.2103, 20.2106, and 20.2110 | yes | Section 5.7.4 |
| (6) The applicant demonstrates that respirators will routinely be used for operations with drying and packing areas and identifies the criteria for determining when respirators will be required for special jobs or emergency situations (Regulatory Guide 8.15, Revision 1) | no | |
| (7) For license renewal applications, the historical results summary of the airborne radiation monitoring program is included through the most recent reporting period preceding the submittal of the application | NA | |
| 5.7.4 Exposure Calculations | | |
| (1) Methodologies proposed to determine the intake of radioactive materials by personnel in work areas where airborne radioactive materials could exist (10 CFR 20.1204 and 20.1201) | yes | Section 5.7.4.1 |
| (2) Exposure calculations for natural uranium are consistent with Regulatory Guide 8.30, Section 3. Inhale | yes | Section 5.7.4.1 |
| Calculating DCA-hr - besides no possibility of inhalation with respirator | | |
| For airborne radon daughter exposure (working levels), calculations are consistent with Regulatory | yes | Section 5.7.4.2 |

| Chapter 5 - operations | | |
|---|---------|------------------------------------|
| Section - Criteria | Present | Location in report |
| Guide 8.30 and Regulatory Guide 8.34, Section C. | | |
| Krusnetz method | | |
| (4) Calculations and guidance for prenatal and fetal radiation exposure are consistent with Regulatory Guide 8.36 and Regulatory Guide 8.13 | yes | Section 5.7.4.4 |
| (5) Exposure calculations are presented for routine operations, non-routine operations, maintenance, and clean-up activities and are consistent with Regulatory Guide 8.30 and Regulatory Guide 8.34 | yes | Section 5.7.4.1 |
| (6) Parameters used in exposure calculations are representative of conditions at the site and include the time-weighted exposure that incorporates occupancy time and average airborne concentrations | yes | Section 5.7.4.1 Section 5.7.4.2 |
| (7) Estimation of airborne uranium concentrations take into account the maximum production capacity requested in the application and the anticipated efficiencies of airborne particulate control systems reviewed using Sections 4.1 and 5.7.1 of ISL Standard Review Plan | no | |
| (8) Reporting and record keeping of worker doses is done in conformance with Regulatory Guide 8.7 and 10 CFR 20.2103 | yes | Section 5.7.4.5 |
| (9) For license renewal applications, the historical results of radiation exposure calculations are included through the most recent reporting period preceding this submittal | NA | |
| 5.7.5 Bioassay program | | |
| Bioassay program is acceptable if it meets: (1) Consistent with applicable sections of Regulatory Guide 8.22 and Regulatory Guide 8.31 Can confirm results from airborne radiation monitoring program and exposure calculations | yes | Section 5.7.5 |
| (2) Determination of which workers will be monitored in the bioassay program | yes | Section 5.7.5 |
| (3) Sampling and analysis frequencies include baseline urinalyses for all new employees and exit bioassays on termination of employment (consistent with Regulatory Guide 8.22 and Regulatory Guide 8.8.9, Revision 1) | yes | Section 5.7.5 |
| (4) Action levels for bioassay monitoring are set in | no | Section 5.7.5 |

| Chapter 5 - operations | | |
|---|---------|--------------------|
| Section - Criteria | Present | Location in report |
| accordance with Regulatory Guide 8.22, Section 5 | | (incomplete) |
| (5) All reporting and record keeping are done in conformance with the requirements of 10 CFR Part 20, Subparts L and M | yes | Section 5.7.4.5 |
| (6) For license renewal applications, the historical bioassay program results are included through the most recent reporting period preceding the submittal of the application | NA | |
| 5.7.6 Contamination Control Program | | |
| (1) Radiation surveys of workers will be conducted to prevent contaminated employees from entering clean areas (Regulatory Guide 8.30) | yes | Section 5.7.6 |
| (2) Requirements for a contamination control program (e.g., maintaining change areas and personal alpha radiation monitoring before leaving radiation areas) are included in standard operating procedures or are discussed in application Consistent with Regulatory Guide 8.30 | yes | Section 5.7.6 |
| (3) Action levels for surface contamination are set in accordance with (Regulatory Guide 8.30) | yes | Section 5.7.6 |
| (4) Monitoring equipment by type, specification of the range, sensitivity, calibration methods and frequency, availability, and planned use is adequately described | yes | Section 5.7.6 |
| (5) All reporting and record keeping is done in conformance with the requirements of 10 CFR Part 20 | yes | Section 5.7.6 |
| (6) The licensee will ensure that radioactivity on equipment or surfaces is not covered by paint, plating, or other covering material unless contamination levels are below limits specified in Table 5.7.6.3-1 | no | |
| (7) The radioactivity of the interior surfaces of pipes, drain lines, or duct work will be determined by making measurements at all traps and other appropriate access points. | yes | Section 5.7.6 |
| (8) The licensee will make a comprehensive radiation survey, in conformance with Regulatory Guide 8.30, Section 1 and NUREG-1575, Revision 1 | no | |
| (9) Appropriate criteria are established to relinquish possession or control of equipment or scrap having surfaces contaminated with material in excess of the limits specified in Table 5.7.6.3-1 (a) Provide detailed information describing the | yes | Section 5.7.6 |

| Chapter 5 - operations | | |
|--|---------|--------------------|
| Section - Criteria | Present | Location in report |
| equipment, or scrap, radioactive contaminants, and the nature and extent, and degree of residual surface contamination | | |
| (9b) Applicant will provide a detailed health and safety analysis that reflects that the residual amounts of contaminated materials on surface areas, together with other considerations such as prospective use of the equipment, or scrap, are unlikely to result in an unreasonable risk to the health and safety of the public | yes | Section 5.7.6 |
| (9c) Applicant includes materials created by special circumstances including, but not limited to, the razing of buildings, transfer of structures or equipment, or conversion of facilities to a long-term storage facility or to standby status | no | |
| 5.7.7 Airborne Effluent & Env. Monitoring Program | | |
| (1) The proposed airborne effluent and environmental monitoring program is consistent with Regulatory Guide 4.14, Sections 1.1 and 2.1 | | |
| Regulatory Guide 4.14, Sections 1.1 and 2.1 | yes | Section 5.7.7 |
| Regulatory Guide 8.37, Section 3 | | |
| (2) The proposed locations of the airborne effluent monitoring stations are consistent with guidance in Regulatory Guide 4.14, Section 1.1.1 | | |
| Regulatory Guide 4.14, Section 2.1.2 | no | |
| Criteria used in selecting location Sampling locations show on topographic map | | |
| (3) The proposed airborne effluent and environmental monitoring program should sample radon, air particulates, surface soils, subsurface soils, vegetation, direct radiation, and sediment in accordance with Regulatory Guide 4.14, Section 3 (Quality of Samples) | yes | Section 5.7.7 |
| (4) The proposed sampling methods are consistent with guidance in Regulatory Guide 4.14, Section 3 (Quality of Samples) | yes | Section 5.7.7 |
| (5) For license renewal applications, the historical airborne effluent and environmental monitoring program results are included through the most recent reporting | NA | |

| Chapter 5 - operations | | |
|--|---------|--|
| Section - Criteria | Present | Location in report |
| period. | | |
| (6) The applicant commits to semiannual airborne effluent and environmental monitoring reporting | yes | Section 5.7.7 |
| 5.7.8 Ground-water & Surface-water Monitoring Programs | | |
| (1)For each new well field, the applicant's approach for establishing baseline water quality is sufficient to: | | |
| (i) define the primary restoration goal of returning each well field to its pre-operational condition | no | |
| (ii) provide a standard for determining when an excursion has occurred | | |
| (2) Applicant selects excursion indicator constituents and upper control limits | yes | Section 5.7.8.2.6 |
| (3) Applicant establishes criteria for determining monitoring well locations. Horizontal and vertical exclusions | | |
| (4) Applicant establishes well field test procedures. Well are tested to prove hydraulic connection between production, injection, and monitoring wells | yes | Section 5.7.8.2.5 |
| (5) Applicant defines operational approaches for the monitoring program (which wells will be sampled for excursion indicators, monitoring frequency, and criteria for determining that an excursion has occurred | yes | Section 5.7.8.2.6 Section 5.7.8.2.7 |
| (6) If ISL is located adjacent to bodies of surface-water, the applicant must establish a surface-water monitoring program that will be effective to detect migration of contaminants into surface-water bodies or demonstrate that the risk in negligible | yes | Section 5.7.8.2.8 Appendix A1 |
| 5.7.9 Quality Assurance | | |
| (1) The quality assurance program has been established and applied to all radiological, effluent, and environmental programs (Regulatory Guide 4.14, Section 3 and 6 and Regulatory Guide 4.15) | yes | Section 5.7.10 Addendum 5-A |
| (2) All reporting and record keeping will be done in conformance with the criteria presented in Section 5.3.2 of this standard review plan | no | |
| (3) For license renewal applications, the historical quality assurance program results are included through the most recent reporting period preceding the submittal of the application | NA | |

| Chapter 6 – Groundwater Quality Restoration, Surface Reclamation and Facility Decommissioning | | |
|--|---------|-------------------------------------|
| Section - Criteria | Present | Location in report |
| 6.1 Plans and Schedules for Groundwater Quality Restoration | | |
| (1) Estimates volume of and quality of extraction solutions that need to be cleaned up during groundwater restoration | yes | Section 6.1.4 |
| (2) Applicant describes the method used for estimating well field pore volume and the associated horizontal and vertical flare | yes | Section 6.6 |
| (3) The application includes well field restoration plans (description of processes and projected completion schedule) | yes | Section 6.1.3, 6.1.5, Figure 6-1 |
| (4) Restoration standards | yes | Section 6.1.1 |
| (5) Post-reclamation stability monitoring | yes | Section 6.1.8.2 |
| (6) External effects of ground-water restoration | no | Section 6.1.7 (incomplete) |
| (7) methods for abandoning wells | yes | Section 6.1.9 |
| (8) Descriptions of water consumption impacts | yes | Sections 3.1.6 & 6.1.7 |
| (9) alternatives to primary or secondary standards | no | |
| (10) onsite evaporation | NA | |
| (11) release to surface waters | NA | |
| (12) land applications | NA | |
| (13) deep well injections | yes | Section 6.1.10 |
| 6.1 Plans and Schedules for Reclaiming Disturbed Lands | | |

| Chapter 6 – Groundwater Quality Restoration, Surface Reclamation and Facility Decommissioning | | |
|---|---------|------------------------|
| Section - Criteria | Present | Location in report |
| (1) appropriate cleanup criteria | yes | Section 6.4, Table 6-7 |
| (2) pre-reclamation radiological survey | yes | Section 6.2.1, 6.2.2 |
| (3) procedures for interpretation of pre-reclamation radiological survey results | no | |
| (4) pre-construction surface contour map | yes | Figure 2.1-1 |
| (5) any changes to existing NRC-approved radiation safety program | no | |
| (6) approved waste disposal agreement | no | |
| (7) submit final reclamation plan 12-months before planned commencement | yes | Sections 6.2.1, 6.4 |
| (8) Decommissioning addresses non-radiological hazardous constituents | yes | Section 6.3.3 |
| (9) QA/QC program addresses all aspects of decommissioning | no | |
| 6.3 Procedures for Removing and Disposing of Structures, Waste Materials, and Equipment | | |
| (1) a program is in place to control residual contamination on structures and equipment | yes | Section 5.7 |
| (2) Measurements of radioactivity on the interior surfaces of pipes, drain lines, and duct work will be determined by making measurements at all traps and other appropriate access points, provided that contamination at these locations is likely to be representative of contamination on the interior of the pipes, drain lines, and duct work | yes | Section 6.3.2 |
| (3) Surfaces of premises, equipment, or scrap that are likely to be contaminated but are of such size, construction, or location as to make the surface inaccessible for purposes of measurement are presumed to be contaminated in excess of the limits. | yes | Section 6.3.2.1 |

| Chapter 6 – Groundwater Quality Restoration, Surface Reclamation and Facility Decommissioning | | |
|--|---------|------------------------------------|
| Section - Criteria | Present | Location in report |
| (4) Before release of structures for unrestricted use, the licensee makes a comprehensive radiation survey to establish that contamination is within the limits specified in standard review plan Section 5.6.7 | yes | Section 6.3.2.1 |
| (5) A contract between the licensee and a waste disposal operator exists to dispose of 11e.(2) byproduct material | yes | |
| (6) The applicant commits to providing final (detailed) decommissioning plans for structures and equipment to the NRC for review and approval at least 12 months before the planned commencement of decommissioning of such structures and equipment | yes | Section 6.3 |
| 6.4 Methodologies for Conducting Post-Reclamation and Decommissioning Radiological Surveys | | |
| (1) The cleanup criteria for radium in soils are met as provided in 10 CFR Part 40, Appendix A, Criterion 6(6) | yes | Section 6.4.1.1 Section 6.4.1.2 |
| (2) Background radionuclide concentrations are determined using appropriate methods as described in Section 2.9 of standard review plan | yes | Section 2.9 |
| (3) Acceptable cleanup criteria for uranium in soil, such as those in Appendix E of standard review plan, are proposed by applicant | yes | Sections 6.4.1.2 and 6.4.1.3 |
| (4) For areas that already meet the radium cleanup criteria, but that still have elevated thorium levels, the applicant proposes an acceptable cleanup criterion for thorium-230 | no | |
| (5) The survey method for verification of soil cleanup is designed to provide 95-percent confidence that the survey units meet the cleanup guidelines | no | |
| 6.5 Financial Assurance | | |
| (1) The bases for establishing a financial surety in 10 | yes | Appendix E |

| Chapter 6 – Groundwater Quality Restoration, Surface Reclamation and Facility Decommissioning | | |
|---|---------|--------------------------|
| Section - Criteria | Present | Location in report |
| CFR Part 40, Appendix A, Criterion 9, are satisfied | | |
| (2) All activities included in the cost estimate are activities that are included either in the reclamation plan or in the operation review completed using Sections 6.1 through 6.4 of this standard review plan | yes | Appendix E |
| (3) All activities included either in the reclamation plan or in Sections 6.1 through 6.4 of standard review plan are included in the financial analysis | yes | Appendix D |
| (4) The assumptions used for the proposal surety are consistent with what is known about the site and design and operations of the facility and its effluent control system | yes | Appendix E |
| (5) Surety values are based on current dollars (or are adjusted for inflation) and reasonable costs for the required reclamation activities are defined | yes | Appendix E |
| (6) The applicant commits to funding the approved financial surety through one of the mechanisms described in 10 CFR Part 40, Appendix A, Criterion 9 | yes | |
| (7) The applicant commits to updating the surety value annually, in response to changes in closure or decommissioning plans, and as necessitated by changes in the facility and its operations | no | Section 6.6 (incomplete) |
| (8) The applicant commits to extending the surety for an additional year if NRC has not approved a proposed revision 30 days prior to the surety expiration date | yes | Section 6.6 |
| (9) The applicant commits to revising the surety arrangement within 3 months of NRC approval of a revised closure (decommissioning) plan if estimated costs exceed the amount of the existing financial surety | yes | Section 6.6 |
| (10) Surety documentation includes a breakdown of costs; the basis for cost estimates with adjustments for inflation; a minimum 15-percent contingency; and changes in engineering plans, activities performed, and any other conditions affecting estimated costs for site | yes | Appendix E |

| Chapter 6 – Groundwater Quality Restoration, Surface Reclamation and Facility Decommissioning | | |
|--|---------|--------------------|
| Section - Criteria | Present | Location in report |
| closure | | |
| (11) The licensee commits to submitting for NRC approval an updated surety to cover any planned expansion or operational change not included in the annual surety update at 90 days prior to beginning associated construction | no | |
| (12) The licensee commits to providing NRC with copies of surety-related correspondence submitted to a state, a copy of the state's surety review, and the final approved surety arrangement | no | |
| (13) Reclamation/decommissioning plan cost estimates, and annual updates should follow the outline in Appendix C to the standard review plan | yes | Appendix E |

| Chapter 7 – Environmental Affects | | |
|--|---------|-----------------------|
| Section - Criteria | Present | Location in report |
| 7.1 Site Preparation and Construction | | |
| 7.2 Effects of Operations | | |
| (1) All anticipated significant environmental impacts from facility operations are identified and applicant provides | | Section 7.2.1 |
| (i) mitigation measures for these impacts | | Section 7.2.2 |
| (ii) justification for why impacts cannot be mitigated | yes | |
| (iii) justification for why it is not necessary to mitigate these impacts to protect the local environment | | Section 7.2.4,1 |
| (2) The applicant demonstrates that the anticipated impacts on terrestrial and aquatic ecology, air quality, surface-and ground-water systems, land, and land use are environmentally acceptable | yes | Sections 7.2.3-7.2.10 |
| 7.3 Radiological Effects | | |
| 7.3.1.1 Exposure from Water Pathways | | |
| (1) The estimates of individual exposure to radionuclides at the site boundary meet the regulatory requirements in 10 CFR 20.1302(b)(2)(i) | yes | Section 7.3.1.1 |

| Chapter 7 – Environmental Affects | | |
|---|---------|------------------------------------|
| Section - Criteria | Present | Location in report |
| (2) Calculations of concentrations of radionuclides in receiving water at locations where water is consumed or is otherwise used by humans or where it is inhabited by biota of significance to human food chains are included in the compliance demonstration for public dose limits in 10 CFR 20.1301 | yes | Section 7.3.1.2 Section 7.3.1.3 |
| (3) For facilities that generate liquid effluents, the relevant exposure pathways are included in a pathway diagram provided by the applicant | no | |
| (4) The conceptual model (scenarios and exposure pathways) is similar to and consistent with methodologies for liquid effluent exposure pathways in Regulatory Guide 1.109 | no | |
| (5) The conceptual model used for calculating the source term and individual exposures from liquid effluents at the facility boundary is representative of conditions described at the site, as reviewed in Section 2.0 of the standard review plan | no | |
| (6) The parameters used to estimate the source term, environmental concentrations and exposures are applicable to conditions at the site, as reviewed in Section 2.0 of the standard review plan | no | |
| 7.3.1.2 Exposures from Air Pathways | | |
| (1) The estimates of individual exposure to radionuclides at the site boundary meet the regulatory requirements in 10 CFR 20.1302(b)(2)(i) with regard to annual average concentrations in airborne effluents or the dose limit in 10 CFR 20.1301 | yes | Section 7.3.1.3 |
| (2) Calculations of concentrations of radionuclides in air at locations downwind where residents live or where biota of significance to human food chains exist are included in the compliance demonstration for public dose limits in 10 CFR 20.1301 | yes | Section 7.3.1.3 |
| (3) Relevant airborne exposure pathways are included in the pathway diagram provided by the applicant. | yes | Figure 7-2 |
| (4) The conceptual model used for calculating the source term and individual exposures from airborne effluents at the facility boundary is representative of conditions described at the site as reviewed in Section 2.0 of this standard plan | yes | Section 7.3.1.3 |
| (5) The parameters used to estimate the source term, environmental concentrations, and exposures are | yes | Section 7.3.1.3 |

| Chapter 7 – Environmental Affects | | |
|---|---------|--------------------------------|
| Section - Criteria | Present | Location in report |
| applicable to conditions at the site, as reviewed in Section 2.0 of this standard review plan | | |
| 7.3.1.3 Exposures from External Radiation | | |
| 7.3.1.4 Total Human Exposures | | |
| 7.3.1.5 Exposures to Flora and Fauna | | |
| (1) The model and parameters values used for calculation of concentrations of radionuclides in important local flora and fauna are consistent with generally accepted health physics practices and are applicable to the species identified at the site, as reviewed in Section 2.0 of the standard review plan | yes | Section 7.3.1.3.6 |
| 7.4 Non-Radiological Effects | | |
| (1) The estimated concentrations of nonradiological wastes in effluents at the point of discharge and the projected effects for both acute and chronic exposure of the biota are adequately quantified in accordance with the NEPA Act of 1969 requirements in 10 CFR 51.45 and 51.60 | yes | Section 7.4 |
| 7.5 Effects of Accidents | | |
| (1) The applicant has provided analyses of credible accident consequences that are consistent with the facility design and planned operations and are sufficient to identify likely environmental impacts from operations | yes | Section 7.5.1 Section 7.5.2 |
| (2) Analyses of accident consequences include mitigation measures, as appropriate | yes | Section 7.5.1 Section 7.5.2 |
| (3) Analyses of accidents include results from operating experience at similar facilities | yes | Section 7.5.1 Section 7.5.2 |
| (4) For radiological accidents, the applicant's response program provides for notification to NRC in compliance with the requirements of 10 CFR 20.2202 and 20.2203 | yes | Section 7.5.1 Section 7.5.2 |
| 7.6 Economic and Social Effects of Construction & Operation | | |

| Chapter 8 – Alternatives to Proposed Action | | |
|---|---------|--------------------|
| Section - Criteria | Present | Location in report |
| The applicant considers process alternatives to the proposed action | yes | Section 8.1 |
| a) The no-action alternative (must be included.) | yes | Section 8.1 |

| Chapter 8 – Alternatives to Proposed Action | | |
|--|---------|--------------------|
| Section - Criteria | Present | Location in report |
| b) Alternative ore extraction processes such as traditional open-pit and underground mining | yes | Section 8.4.1 |
| c) Alternative lixiviant chemistry | yes | Section 8.3.1.1 |
| d) Alternative ground-water restoration and long-term monitoring techniques | yes | Section 8.3.1.2 |
| e) Alternative monitoring and waste management practices | yes | Section 8.3.1.3 |
| f) Uranium recovery process alternatives | yes | Section 8.3.1 |
| g) Construction of a central processing facility versus use of satellite facilities | no | |
| 2) The alternatives are compared with the proposed actions considering the site characteristics as reviewed in Section 2.0 of this standard review plan and consistent with existing uranium extraction standards and practices The rationale for selecting the proposed method should be provided, and the proposed action should be shown to be at least as effective as the considered alternatives in meeting all regulatory requirements. If the application is for a new commercial-scale license, the consideration should be based on the results of the research and development site, if applicable | yes | Section 8.6 |
| 3) The applicant considers the environmental, social, and economic effects of a no-action alternative. Presumably, the applicant will provide information to demonstrate that the proposed action will provide social and economic benefits that outweigh the environmental impact of operating the facility. | no | |
| 4) The applicant clearly identifies the preferred alternative and demonstrates that it would meet the requirements of 10 CFR Part 40, Appendix A | no | |

| Chapter 9 – Cost Benefit Analysis | | |
|--|---------|--------------------|
| Section - Criteria | Present | Location in report |
| The economic benefits of the construction and operation of the proposed facility are acceptably summarized. These may include, but are not limited to: a) Tax revenues to be received by federal, state, and local governments | yes | Section 9.3.3 |

| Chapter 9 – Cost Benefit Analysis | | |
|---|---------|-------------------------------|
| Section - Criteria | Present | Location in report |
| b) Temporary and permanent jobs | yes | Section 9.3.2 |
| c) Incremental increases in regional productivity of goods and service | no | |
| d) Enhancement of recreational values | no | |
| e) Environmental enhancement in support of the propagation or protection of wildlife and the improvement of wildlife habitats | no | |
| f) Creation and improvement of local roads, waterways, or other transportation facilities | no | |
| g) Increased knowledge of the environment as a consequence of ecological research and environmental monitoring activities associated with plant operation and technological improvements from the applicant's research program | no | |
| 2) Economic benefits are estimated based on realistic assumptions and objective sources such as census data, tax information, and other site characteristics reviewed in Section 2.0 of this standard review plan. | yes | Section 9.3 |
| 3) The applicant provides a summary of the costs of plant decommissioning and site reclamation costs, and ground-water restoration | no | |
| 4) The applicant summarizes short-term external costs as they affect the interests of people other than the owners and operators of the proposed facility. These may include, but are not limited to a) Housing shortages | yes | Section 9.4.1.1, Table 9-3 |
| b) Local inflation | no | |
| c) Noise and congestion | yes | Section 9.4.1.3 |
| d) Overloading of the water supply, water treatment facilities, and disposal landfills | yes | Section 9.4.1.2 |
| e) Crowding of schools, hospitals, recreational facilities, or other public facilities | yes | Section 9.4.1.2 |
| f) Disruption of people's lives (e.g., ranching, farming) through the acquisition of land | no | |
| 5) The applicant summarizes long-term external costs as they affect the interests of people other than the owners and operators of the proposed facility. These may include, but are not limited to a) Impairment of recreational values through reduction in | yes | Section 9.4.2.1, 9.4.2.3 |

| Chapter 9 – Cost Benefit Analysis | | |
|---|---------|--------------------|
| Section - Criteria | Present | Location in report |
| wildlife and sport animals | | |
| b) Restrictions on access to land or water | no | |
| c) Aesthetic impacts | yes | Section 9.4.2.1 |
| d) Degradation or limited access to areas of historical, scenic, or cultural interests | no | |
| e) Lost income related to limitations on access to land and facilities | no | |
| f) Decreased real estate values | no | |
| g)Increased cost to provide government services for increased populations | no | |
| 6) The applicant identifies who is most likely to be affected by the construction and operation of the proposed facility, and to the extent possible, identifies how long the disturbance is expected. This information should be consistent with the population information reviewed in Section 2.3 of this standard review plan | no | |
| 7) If the application is for a renewal, the applicant provides a summary of the actual economic benefits and costs of the facility since the last licensing action | NA | |
| 8) A comparison of the benefits and costs is presented that acceptably justifies proceeding with the in situ leach operations | yes | Section 9.5 |
| 9) For special case environmental assessments (e.g., those that have substantial public interest, decommissioning cases involving on-site disposal, decommissioning/ decontamination cases that allow radioactivity in excess of release criteria, or cases where environmental justice issues have been previously raised) the applicant has provided sufficient data to assess environmental justice issues in accordance with NUREG-1748 (NRC, 2001) | NA | |
| 10) The irreversible and irretrievable commitments of resources for the construction, operation, restoration, reclamation, and decommissioning of the proposed facility are appropriate considering the following: a) Permanent land withdrawal | no | |
| b) Permanent commitment of mineral resources | no | |
| c) Permanent commitment of water resources Post ground-water restoration impacts at public water | yes | Section 9.4.3 |

| Chapter 9 – Cost Benefit Analysis | | |
|---|---------|--------------------|
| Section - Criteria | Present | Location in report |
| supply wells are acceptable if the water quality at town wells is consistent with EPA primary and secondary drinking water standards and NRC standards for uranium | | |
| d) Irreversible loss of surface vegetation | no | |
| e) Irreversible loss of wildlife or wildlife habitat | no | |
| f) Irreversible commitments of material resources including processing chemicals and energy needs | no | |
| 11) For each resource area, the applicant identifies who is affected, the duration of impacts, and any mitigation measures proposed as necessary to alleviate or reduce impacts | no | |

| Chapter 10 – Environmental Approvals and Consultations | | |
|---|---------|--------------------|
| Section - Criteria | Present | Location in report |
| The applicant provides a summary of all permits or licenses obtained for the proposed facility. These should clearly identify | yes | Section 10.1 |
| a) the type of permit or license | | |
| b) The granting authority (local, state, regional, tribal authorities, or federal) | yes | Section 10.1 |
| c) The permit or license number (if appropriate) | yes | Section 10.1 |
| d) The current status, with expiration date, if appropriate | yes | Section 10.1 |
| 2) For permits not yet granted, the applicant provides a discussion of the current status of the application and objective evidence that the applicant has applied for, but has not yet received, the permit from the granting authority. Such evidence may include copies of documents such as letters from the granting authority or the permit application | yes | Section 10.1 |
| For permits and licenses not yet granted, the applicant indicates when approval is expected. Consultations with the granting authority can be summarized | yes | Section 10.1 |
| 4) The granting authority is clearly defined and appropriate to the area being permitted or licensed. If permits are granted under Agreement State status, this should be identified in the application | yes | Section 10.1 |

| Chapter 10 – Environmental Approvals and Consultations | | |
|---|---------|--------------------|
| Section - Criteria | Present | Location in report |
| 5) For licenses renewals and amendments, the applicant summarizes public meetings and meetings held with environmental and other citizens' groups since the last licensing application, and responses to the concerns expressed at these meetings | NA | |