

DRC-2014-005722

September 29, 2014

VIA EMAIL AND HAND-DELIVERY

Rusty Lundberg
Utah Department of Environmental Quality
Division of Radiation Control
State of Utah Office Park
195 North 1950 West
Salt Lake City, UT 84116
rlundberg@utah.gov



RECEIVED
SEP 29 2014
DEPARTMENT OF
ENVIRONMENTAL QUALITY

Re: **RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION**
Shooting Canyon Uranium Milling Facility
Radioactive Materials License UT 0900480
Ground Water Quality Discharge Permit UGW170003

Dear Mr. Lundberg:

By letter dated September 16, 2014, the Department of Environmental Quality, Division of Radiation Control ("DRC") provided Uranium One Americas, Inc. ("Uranium One") and Anfield Resources Holding Corp. ("Anfield," and together with Uranium One, the "Applicants") with a Request for Additional Information ("RAI") concerning the transfer of control of the above referenced Radioactive Materials License and Ground Water Quality Discharge Permit. The Applicants' responses to the RAI are addressed below and are numbered according to the numbering in the RAI.

RAI 1: Provide a complete description of the transaction (transfer of stocks or assets, or merger). Indicate whether the name has changed and include the new name. Include the name and telephone number of a licensee contact who DRC may contact if more information is needed.

(a) Confirm new name of proposed licensee: Anfield Resources Holding Corp.

The name of the proposed licensee is Anfield Resources Holding Corp.

(b) Provide contact information including the name and telephone numbers of the person(s) responsible for the Mill oversight, engineering, groundwater compliance and Radiation Safety oversight.

Corporate oversight for the Mill will be provided by Mr. Joshua Bleak, President of Anfield Resources Holding Corp. Contact information for Mr. Bleak is:

Anfield Resources Holding Corp.
3346 W. Guadalupe Rd.
Apache Junction, AZ 85120
Phone: (480) 288-6530

Engineering, groundwater compliance, and Radiation Safety oversight will be provided by Ms. Sheryl Garling and Mr. Roger Garling of R and D Enterprises, Inc.

R and D Enterprises, Inc.
4495 Squaw Creek Road (82604)
P.O. Box 3321
Casper, WY 82602
Phone: (307) 277-3861

(c) Include the mailing address and telephone number for the proposed licensee if these items are to be modified

Anfield's address and telephone contact information is:

Anfield Resources Holding Corp.
3346 W Guadalupe Rd.
Apache Junction, AZ 85120
Phone Number: (480) 288-6530

RAI 2: Describe any changes in personnel or duties that relate to the licensed program. Include training and experience for new personnel.

All information requested under RAI 2 is attached hereto as Schedule A.

RAI 3: Describe any changes in the organization, location, facilities, equipment or procedure that relate to the licensed program.

No additional information required.

RAI 4: Describe the status of the surveillance program (surveys, wipe tests, quality control) at the present time and the expected status at the time that control is to be transferred.

(a) Have Uranium One confirm all required surveillance records were given to Anfield for their review

Uranium One confirms that all required surveillance records were given to Anfield for Anfield's review.

(b) Please confirm that on the date of transfer all surveillance will be current

The Applicants confirm that on the date of transfer all surveillance will be current.

RAI 5: Confirm that all records concerning the safe and effective decommissioning of the facility will be transferred to the transferee (proposed licensee). These records include documentation of surveys of ambient radiation levels and fixed and/or removable contamination, including methods and sensitivity.

(a) Please confirm that Uranium One and Anfield understand that the records transfer requirement includes all records concerning the safe and effective decommissioning of the facility and the methods and sensitivities for all measurements necessary to document the safe and effective decommissioning of the facility.

The Applicants confirm their understanding that the records transfer requirement includes all records concerning the safe and effective decommissioning of the facility and the methods and sensitivities for all measurements necessary to document the safe and effective decommissioning of the facility.

RAI 6: Confirm that the transferee will abide by all constraints, conditions, requirements and commitments of the transferor or that the transferee will submit a complete description of the proposed licensed program.

No additional information required.

RAI 7: Surety requirements including financial surety arrangements.

(a) Anfield must submit a financial mechanism that secures the funds necessary for decommissioning the Shootaring Mill.

Anfield confirms that it will submit a financial mechanism that will adequately secure the funds necessary for decommissioning the Shootaring Mill. Anfield is in the process of obtaining a new Letter of Credit from the Bank of Montreal in the same form as the current Letter of Credit (LOC BMCH388139OS) for the Radioactive Materials License and in the amount of the recently approved decommissioning estimate of \$9,346,014.00. Anfield will file the new Letter of Credit with the DRC on or before the closing of the proposed transaction between Uranium One and Anfield.

If you have any questions about the enclosed responses, please contact the officers of the Applicants named below.

Uranium One Americas, Inc.



Donna Wichers, President
Phone: (307) 234-8235, ext. 333
Email: Donna.Wichers@uranium1.com

Anfield Resources Holding Corp.



Joshua Bleak, President
Phone: (480) 288-6530
E-mail: jbleak@mjresources.com

Enclosures

Schedule A

Information Requested by RAI 2

1. The DRC has requested a US NRC license number under which Ms. Garling was named as the RSO. Below is a table of US NRC or agreement state licensed facilities at which Ms. Garling has recently served as the RSO or performed other radiation safety or environmental work.

License Number	Licensee	Activity
USNRC 49-29405-01	Inter-Mountain Laboratories, Inc., Sheridan, WY	2010-2012 Contract Radiation Safety Officer; Currently, consult with staff on USNRC regulatory criteria
TCEQ R03626	Uranium Energy Corporation/ South Texas Mining Venture Hobson Facility, Texas	2012-current Provide license required ALARA and Environmental audit services and reports; DOT Hazmat and RAM training
TCEQ R06062	Uranium Energy Corporation/ South Texas Mining Venture LaPalangana, Texas	2012-current Provide license required ALARA and Environmental audit services and reports; DOT Hazmat and RAM training
USNRC SUA-1534	CAMECO Resources Crow Butte Resources, Nebraska	2011-current Provide license required ALARA audit service and report; DOT Hazmat and RAM training
USNRC SUA-1341	Uranium One Americas, Inc. Wyoming	2012 Provided license required ALARA audit service and report
USNRC 49-26846-01	Energy Laboratories, Inc., Casper, WY	1990-02/25/2008 Contract and employee Radiation Safety Officer

2. The DRC has requested information on the refresher training on uranium recovery facility health physics within the past two years. Both Mr. and Ms. Garling attended a training course in February 2014. Certificates evidencing this training are enclosed herewith.

Ms. Garling has worked for domestic uranium (UR) recovery facilities in the following areas: baseline sampling, environmental and process analytical chemistry support, radiation safety officer, decommissioning and decontamination, and technical support. Ms. Garling's training and work experience includes the following:

- The proper application and use of portable, laboratory and passive monitoring and detection devices and instrumentation to measure and detect alpha, beta and gamma radiation at UR facilities;

- Perform field and laboratory analytical measurements, field sampling, process sampling, and proper collection, handling, and preserving samples to support compliance monitoring programs for operational, environmental and occupational exposure;
 - Perform manual and electronic calculations to assess occupational exposure for total effective dose equivalent using TLD/OSL gamma dosimeters, radon daughters, air particulate and bioassay analytical results;
 - Design, construction, operation, baseline sampling, and decommissioning activities for uranium recovery ISR research and development facilities, commercial ISR, and conventional mining operations;
 - Provide thorough hands-on experience to identify radiation exposure hazards, controls and monitoring required for uranium recovery processes.
3. Because Anfield has indicated that the Radiation Safety Officer will be a consultant, the UDRC has requested additional information. Anfield responds as follows:

- a. *Describe the control over the radiation safety program that will be delegated so that the Consultant – RSO will be able to exercise his/her authority over facility employees when confronted with radiation safety problems that require implementation of corrective actions.*

Anfield will delegate authority to the RSO such that the RSO will have the responsibility for development and implementation of the radiation protection program with the goal of maintaining occupational exposures as low as reasonably achievable (ALARA). The RSO will have the authority to comply with regulatory requirements and enforce policies that could impact the radiation protection program. The RSO will have the primary responsibility for the technical adequacy of the radiation program and the implementation of the ALARA program. The RSO will prescribe adequate equipment and facilities to monitor radiation exposures for the attainment of the ALARA goal. The RSO will review and approve plans and changes in operating procedures to ensure adequate radiation protection and meet the goals of the ALARA program. The RSO will have the responsibility for the periodic audit of procedures to meet ALARA objectives.

- b. *Describe the relationship that will exist between the Consultant – RSO and the licensee's institutional management regarding expenditure of funds to facilitate the objectives of the licensee's radiation safety program and related regulatory requirements.*

Anfield management will financially support the implementation of the radiation protection and ALARA programs to comply with regulatory requirements. Anfield will allocate adequate funds as requested by the RSO to implement these programs. The RSO will submit budgets to Anfield management that will reflect anticipated expenditures to support the radiation protection and ALARA programs.

- c Identify other commitments of the Consultant – RSO for other NRC or Agreement State licensed facilities (identify if the Consultant – RSO is currently named as RSOs on or provides consulting services for other radioactive material licensees), and describe how the Consultant-RSO will allocate time to permit the performance of the duties of the RSO as described in the regulations or license application. State the Consultant – RSO's minimum amount of onsite time (approximate hours per week)*

Approximately 30% of R and D enterprises, Inc.'s current commitments encompass technical consultation services for a variety of uranium recovery and O&G operations. These commitments are shown in the table above where "current" is indicated in the right-hand column. R and D Enterprises, Inc's commitment to other NRC or Agreement State operations includes technical support services for baseline monitoring, generating environment effluent monitoring reports, locating radiation monitoring and analytical instrumentation and equipment, ALARA, environmental and laboratory audits, commercial analytical laboratory consulting, data validation, and radiation safety. R and D Enterprises, Inc will fulfill the duties as RSO in accordance with the current practices approved by the State of Utah for Uranium One Americas, Inc. Anfield does not foresee any changes in the current approved practices until license renewal and modification. The RSO will be able to allocate the necessary time to comply with current license conditions. Anfield is committed to providing RSO coverage appropriate to site conditions.

- d Appoint a licensee representative who will serve as the point of contact during the RSO's absence. It may be prudent to appoint a representative of executive management who speaks with authority when interacting with the regulatory agency, has the authority to act on the Consultant's findings, and is allowed to assist the Consultant-RSO who has limited authority*

Anfield's representative that will serve as the point of contact during the RSO's absence will be Mr. Roy Fuller, VP of Regulatory Affairs of Anfield, who will have the authority to act on all of the Consultant-RSO's findings.

- e Describe the overall availability of the Consultant – RSO to respond to questions or operational issues that arise during the conduct of the licensee's radiation safety program and related regulatory requirements. What is the maximum amount of time that it will take the Consultant – RSO to arrive at the facility in the event of an emergency that requires his/her presence?*

The Consultant-RSO will be available via phone or email to respond to questions or operational issues that arise on an ongoing basis. The Mill is currently on stand-by status, and site activities include general maintenance, inspections, and overall site security. The Consultant-RSO is located in Casper, Wyoming. In the event that the RSO's presence is required it will take approximately 6-10 hours to arrive on site.

Radiation Safety & Control Services, Inc.

Awards this certificate to

Roger Garling

in recognition of satisfactory completion of a 40 hour course in

Radiation Safety Officer Training

Orlando, FL

February 17- 21, 2014




Jennifer A. Collins - Enrolled Training Manager

Course Instructors:

This course has been approved for 40, Category A, CE credits (reference number NHZ0183001) by the ASRT and 32 CE credits by the AAHP (ID number 2013-00-002).

NOTE: This class satisfies the Department of Transportation requirements listed in Title 49 CFR, parts 172 subpart H, (a) (1), (3), and (4) and expires three years from the date listed above. Note that the employer must provide any function-specific training required to meet all of subpart H requirements.

Radiation Safety & Control Services, Inc.

Awards this certificate to

Sheryl Garling

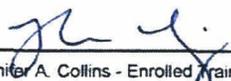
in recognition of satisfactory completion of a 40 hour course in

Radiation Safety Officer Training

Orlando, FL

February 17- 21, 2014




Jennifer A. Collins - Enrolled Training Manager

Course Instructors:

This course has been approved for 40, Category A, CE credits (reference number NHZ0183001) by the ASRT and 32 CE credits by the AAHP (ID number 2013-00-002).

NOTE: This class satisfies the Department of Transportation requirements listed in Title 49 CFR, parts 172 subpart H, (a) (1), (3), and (4) and expires three years from the date listed above. Note that the employer must provide any function-specific training required to meet all of subpart H requirements.