

**ATTENDANCE/DRAFT MINUTES  
QUARTERLY CONFERENCE CALL ON SUBPART W  
4/6/2010**

Reid Rosnick – EPA	Katie Sweeney – National Mining Assoc.
Tom Peake – EPA	Richard Blubaugh – National Mining Assoc.
Susan Stahle – EPA	Amy Churkill - Powertech
Angelique Diaz – EPA	John Cash – Ur Energy
Sharyn Cunningham – CCAT	Richard Tohe – Sierra Club
Paul Carestia – CCAT	Mary Brooke Sunderland – Sheep Mt. Alliance
Cheryl Dunn – CCAT	Mike Thomas - Uranerz
Lynn Holtz – CCAT	Mike Griffin – Uranium One
Travis Stills – Energy Minerals Law Ctr.	Sarah Fields – Uranium Watch
Scott Bakken - Cameco	
John Hamrick – Cotter Corp.	
Jim Cain – Cotter Corp.	
Randy Whicker – Cotter Corp.	
Zach Rogers – Energy Fuels	
Oscar Paulson – Kennecott Mining	

**Minutes and Discussion**

Welcome - Roll Call

(Reid) – Documents that were requested to be placed on the Subpart W website on the last call have been completed. The list included:

- April 26, 2007 Notice of Intent to Sue
- Civil Suit filed against EPA
- November 3, 2009 letter from DOJ establishing effective date of settlement agreement
- Procedures for fabricating the Method 115 flux equipment
- Quality Assurance Project Plan
- EPA procedures for determining confidential business information
- Contract EP-D-05-002

The contract listed above expired on March 26, 2010, but has been replaced by contract EP-D-10-42, which became effective in March 2010. This document is the current contract between EPA Office of Radiation and Indoor Air and S.Cohen and Associates for technical support work to EPA, and has also been placed on the website.

The contract for this period tasks the contractor with several items related to Subpart W:

**Risk Assessment Model.** The final 1989 EIS used AIRDOS to calculate dose and risk to the public. The contractor will review the appropriateness of using AIRDOS to calculate individual and population dose and risk, and provide a recommendation on the best model for use in presenting findings on individual and populational dose and risk.

**Detailed Risk Estimates.** The contractor will develop detailed risk estimates for each source of emission from the management of uranium byproduct materials from the processing of uranium ores. These estimates were presented on a facility-by-facility basis in the 1989 EIS, and they will be conducted in the same format for this analysis. In addition to existing facilities, two or three representative facilities will also be generated that will be used to approximate conditions of new facilities in different geographic locations. This will be done to accommodate the recognition that several new processing facilities are expected to apply for licenses in the near future.

**Economic Impact Analysis.** The contractor will contribute to analyzing the economic impacts of the Subpart W regulation, and contribute to assessing the distribution of costs and benefits among various segments of the population, with a particular focus on disadvantages and vulnerable groups.

**Background Information Document.** The contractor will also begin drafting chapters for a background information document. Some topics that need to be addressed in the document include; Characterization of the problem being addressed, data and scientific analyses needed to make the decision, historical background, risk assessment.

(John Hamrick) For production of the risk assessments, EPA should take advantage of the public health assessment produced by ATSDR at the Cotter mill.

(Travis Stills) – Settlement agreement letter and spirit contemplated a much broader and deeper set of documents on the website, similar to items that would be requested under a FOIA request. Reid explained that the website is not as complete as a rulemaking docket, and asked what else Travis would like to see on the website. Travis stated that the Plaintiffs would like to see all non-privileged documents while preparing Subpart W, and documents for ongoing work.

Doug Chambers (SENES): will his radon data be included on the website? Reid says that we will look at a national and international basis.

- Travis would like the presentation to be on the Subpart W website.
- Reid will put them on the Subpart W website (also publicly available NMA and NRC website). Katie Sweeney said that it's okay.

(Reid) Public Meeting in Utah. Last meeting in CCAT/EPA Settlement Agreement  
5/24/10; 6pm-8pm, White Mesa Community Center (Ute)

- EPA presentation with plenty time for discussion
- (S. Fields) Will there be an opportunity for individual/group to also present at this meeting? Reid. If one group allowed, then all groups allowed (including industry)

(Reid) Options for various monitoring techniques

- Looking at whether flux rate is still the best option for a standard?
- Compare Subpart W to Subparts B and H (10 mrem/yr). Looking at whether radon flux standard should be changed to an effective dose equivalent based on modeling. Of course some information would be input into model.
- (Oscar Paulson) Concerns over models and validation. What contact does EPA have with model review? (Reid) Realize shortcomings of CAP-88 code and we are making sure validation is good. We are aware of shortcomings and hope to have them addressed.
- (J. Hamrick) Request that EPA consider the amount of radon information collected by mills on a daily basis and where information exists use it as an input for the model
- Solicited information/thoughts from people on the call – contact Reid via E-mail.
- Travis – wants communications on this. Reid said there is none. S. Stahle – recognize that deliberative information will not go on the website.
  
- (S. Fields) When does Subpart B plan on being reviewed? (Reid) No answer now. Decision would be made by ORIA management. No time set to date.
  
- (S. Cunningham) Are we looking at the possibility of radon testing at Subpart W facilities built after 1989. (Reid) Short answer – yes. We will be looking at continuing with work practices or looking at flux standard?
  
- (O. Paulson) NRC looks at dose above background. Concerned about background affecting radon at mills from natural sources. Are we looking at background? (Reid) It is something we will look at. Precedent for GW for 4 quarters of background.
  
- (O. Paulson) Data from Cameco from ISLs? When will it go on the website? (Reid) Commits to have it on by next conference call (July 6<sup>th</sup>).

**Next call date and time**

Tuesday, July 6, 2010 at 11 AM EST

Call-in number: 866-299-3188

Conference code: 2023439563