



ATTN: Document Control Desk
Director, Office of Nuclear Materials Safety and Safeguards
U.S. Nuclear Regulatory Commission
Washington DC 20555-0001

March 4, 2024

40-9075

RE: Source and Byproduct Materials License SUA 1600 Renewal Application for the Dewey-Burdock Project, Custer and Fall River Counties, South Dakota.

Powertech (USA) Inc., which is the United States based wholly owned subsidiary of enCore Energy Corp., has been working to bring the Dewey-Burdock Uranium Project in South Dakota into production for over 16 years. Powertech (USA) Inc., is committed to advancing the Dewey-Burdock Uranium Project into production and the renewal of License SUA 1600 is a cornerstone in the future success of the Project. Attached is the SUA 1600 License Renewal Package comprised of the NRC Form 313 and supplemental information to the Form 313, a cross reference to the combined Technical/Environmental Report and the combined Technical/Environmental report. The combined Technical/Environmental report incorporates applicable NRC guidance regulations for both the TR and ER and has been the format used by other licensees.

Background

The NRC issued Source and Byproduct Materials License SUA 1600 on April 8th, 2014. The License was appealed to the Atomic Safety and Licensing Board (ASLB) and again to the 10th DC Circuit Court of Appeals. The 10th Circuit court ruled in favor of the NRC on December 22, 2022, and is considered the effective date of the License. To date all major permitting and licensing processes have been challenged at the agency level (review boards ASLB and Environmental Appeals Board (EAB)) as well as through litigation in the courts.

The project is still years (2-3) away from the ability to start construction. EPA UIC permits (Class III and Class V) were issued on November 24, 2020. The UIC permits were challenged in 2020 to the EPA (EAB) and are scheduled for oral arguments in March of this year. The appeal of the Aquifer exemption for the project is currently stayed in the 8th Circuit Court of appeals pending the EAB ruling on the UIC permits. All of the State of South Dakota required permits and likely hearings have yet to be issued or scheduled. The State of South Dakota will not advance permitting or schedule hearings until all federal permitting, approvals, and challenges are resolved. The only thing that has changed regarding this License is time. There have been no activities undertaken at the site. This renewal application focuses on the few items in the Licensing documents that could be updated, much of the information in the Licensing documents use by the NRC to issue SUA 1600 remains valid, unchanged, and relevant to current conditions.

License Renewal Application Components

Powertech (USA) Inc. License Renewal Application was developed as a combined Technical and Environmental report (TR/ER). The TR/ER document was developed to comply with 10 CFR Part 40,

NMSS20
NMSS

specifically 10 CFR 40.43, 10 CFR 40.31, 10 CFR 40.32 and NUREG 1569. 10 CFR 40.43, Renewal of Licenses states, “Application for renewal of a specific license must be filed on NRC Form 313 and in accordance with § 40.31”. The TR/ER cross reference table identifies the sections of the combined TR/ER where modifications and or additional information to the original License documents is located. As previously indicated, much of the original licensing document information has not been changed.

A key guidance used in the renewal package was NUREG 1569. NUREG 1569 was developed for NRC staff to ensure a consistent quality and uniformity of staff review of applications to develop and operate uranium in situ leach facilities, it also applies to Licenses renewal applications as stated in 10 CFR 40.43. In NUREG 1569, staff is guided to review various sections of an application (outlined in 10 CFR 40.31) for five criteria. These criteria include, area of review, review procedures, acceptance criteria, evaluation of findings and references. Under the review procedures criteria, approximately 92% of the review sections in NUREG 1569 reference Appendix A for guidance when reviewing renewal applications. Specifically, the language states

“For license renewals and amendment applications, Appendix A to this standard review plan provides guidance for examining facility operations and the approach that should be used in evaluating amendments and renewal applications.”

Appendix A of NUREG 1569 is specific guidance for reviewing historical aspects of site performance for License renewals and amendments. As expected, there are few, if any, of the specific areas for review listed in Appendix A, that could be included in this renewal application as the site has never operated, thus there is no data to review. In fact, the language at the bottom of Appendix A states:

“If, after a review of these historical aspects of site operations, the staff concludes that the site has been operated so as to protect health and safety and the environment and that no unreviewed safety-related concerns have been identified, then only those changes proposed by the license renewal or amendment application should be reviewed using the appropriate sections of this standard review plan. Aspects of the facility and its operations that have not changed since the last license renewal or amendment should not be re-examined.”

In addition, as previously mentioned, no activities have been undertaken at the site, subsequently the NRC statement (below) from the Safety Evaluation Report (Revised) (April 8, 2014, Cover letter -TAC J00606) is relevant and applicable now as it was when it was issued in 2014.

“In accordance with 10 CFR 40.32.(d) the staff finds that the issuance of a license to Powertech (USA) will not be inimical to the common defense and security or to the health and safety of the public”.

It should also be noted that SUA 1600 License conditions requiring information prior to the start of construction and operations would address a sizable number of the requirements identified in 10 CFR 40.31 and NUREG 1569, specifically Appendix A for a renewal application. These conditions are identified in Section 9.0 Administrative Conditions; Section 10.0 Operations, Controls, Limits and Restrictions; Section 11.0 Monitoring, Recording and Bookkeeping Requirements and Section 12.0



Preoperational Conditions. The attached License Renewal Application Cross reference table identifies these license conditions as well as tie down requirements (license condition 9.2) to the approved license documents Technical Report, Environmental Report, SEIS Supplement 4 and the Safety Evaluation Report. The License conditions are quite robust in addressing preoperational requirements.

Powertech (USA) Inc., respectfully requests the renewal of SUA 1600 or placement of the License in a state of timely renewal pending further questions or information requests from NRC staff. Powertech (USA) Inc., will provide the NRC with any requested supplemental information in support of this renewal application. If you have questions, please contact me or Jon Winter at jwinter@encoreuranium.com. We look forward to working with NRC staff on a quick and efficient review.

Regards,

A handwritten signature in blue ink, appearing to read 'Peter Luthiger'.

Peter Luthiger
Chief Operating Officer
Office: 361.239.5449
Cell: 361.413.8989
www.encoreuranium.com

Docket No. 40-9075
License No. SUA-1600

Enclosures:

NRC Form 313 and supplemental information
Combined Technical/Environmental Report Cross Reference
Combined Technical/Environmental Report – Application

cc: ATTN: Jen Whitman, Deputy Director, Division of Decommissioning, Uranium Recovery, and Waste Programs, Office of Nuclear Material Safety and Safeguards, U.S. Nuclear Regulatory Commission, Two White Flint North, 11545 Rockville Pike, Mail Stop T-5A10, Rockville, MD 20852-2738



NRC FORM 313

U.S. NUCLEAR REGULATORY COMMISSION

APPROVED BY OMB: NO. 3150-0120

EXPIRES: 07/31/2026

(10-13-2023)
10 CFR 30, 32,
33, 34, 35, 36,
37, 39, and 40



APPLICATION FOR MATERIALS LICENSE

Estimated burden per response to comply with this mandatory collection request: 4.3 hours. Submission of the application is necessary to determine that the applicant is qualified and that adequate procedures exist to protect the public health and safety. Send comments regarding burden estimate to the FOIA, Library, and Information Collections Branch (T-6 A10M), U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001, or by email to InfoCollections.Resource@nrc.gov, and the OMB Reviewer at: OMB Office of Information and Regulatory Affairs, (3150-0120), Attn: Desk Officer for the Nuclear Regulatory Commission, 725 17th Street NW, Washington, DC 20503; email: oir_submission@omb.eop.gov. The NRC may not conduct or sponsor, and a person is not required to respond to, a collection of information unless the document requesting or requiring the collection displays a currently valid OMB control number.

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

APPLICATION FOR DISTRIBUTION OF EXEMPT PRODUCTS FILE APPLICATIONS WITH:

MATERIALS SAFETY AND TRIBAL LIAISON BRANCH
DIVISION OF MATERIALS SAFETY, SECURITY, STATE AND TRIBAL PROGRAMS
OFFICE OF NUCLEAR MATERIALS SAFETY AND SAFEGUARDS
U.S. NUCLEAR REGULATORY COMMISSION
WASHINGTON, DC 20555-0001

ALL OTHER PERSONS FILE APPLICATIONS AS FOLLOWS:**IF YOU ARE LOCATED IN:**

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

SEND APPLICATIONS TO:

LICENSING ASSISTANCE TEAM
DIVISION OF RADIOLOGICAL SAFETY AND SECURITY
U.S. NUCLEAR REGULATORY COMMISSION, REGION I
475 ALLENDALE ROAD, SUITE 102
KING OF PRUSSIA, PA 19406-1415
R1DRSSMail.Resource@nrc.gov

*Note: The preferred method to submit NRC Form 313 is email. Any other document (e.g., financial assurance documents) should be sent via mail.

IF YOU ARE LOCATED IN:

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

MATERIALS LICENSING BRANCH
DIVISION OF RADIOLOGICAL SAFETY AND SECURITY
U.S. NUCLEAR REGULATORY COMMISSION, REGION III
2443 WARRENVILLE ROAD, SUITE 210
LISLE, IL 60532-4352
R3-DRSSMail.Resource@nrc.gov

*Note: The preferred method to submit NRC Form 313 is email. Any other document (e.g., financial assurance documents) should be sent via mail.

IF YOU ARE LOCATED IN:

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

SEND APPLICATIONS TO:

MATERIALS LICENSING BRANCH
DIVISION OF RADIOLOGICAL SAFETY AND SECURITY
U.S. NUCLEAR REGULATORY COMMISSION, REGION IV
1600 E. LAMAR BOULEVARD
ARLINGTON, TX 76011-4511
R4licensing@nrc.gov

*Note: The preferred method to submit NRC Form 313 is email. Any other document (e.g., financial assurance documents) should be sent via mail.

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

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

☐ A. NEW LICENSE

☐ B. AMENDMENT TO LICENSE NUMBER

☒ C. RENEWAL OF LICENSE NUMBER

SUA 1600

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

310 2nd Ave
Edgemont, SD 57735

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

Powertech USA, Inc.
101 N. Shoreline Blvd, Suite 450
Corpus Christi, TX 78401

4. NAME OF PERSON TO BE CONTACTED ABOUT THIS APPLICATION

Jon Winter

BUSINESS TELEPHONE NUMBER

361-239-5449

BUSINESS CELLULAR TELEPHONE NUMBER

307-315-2638

BUSINESS E-MAIL ADDRESS

jwinter@encoreuranium.com

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

5. RADIOACTIVE MATERIAL

a. Element and mass number; b. chemical and/or physical form; and c. maximum amount which will be possessed at any one time.

6. PURPOSE(S) FOR WHICH LICENSED MATERIAL WILL BE USED.

7. INDIVIDUAL(S) RESPONSIBLE FOR RADIATION SAFETY PROGRAM AND THEIR TRAINING AND EXPERIENCE.

8. TRAINING FOR INDIVIDUALS WORKING IN OR FREQUENTING RESTRICTED AREAS.**9. FACILITIES AND EQUIPMENT.****10. RADIATION SAFETY PROGRAM.****11. WASTE MANAGEMENT.****12. LICENSE FEES (Fees required only for new applications, with few exceptions*)
(See 10 CFR 170 and Section 170.31)**

*Amendments/Renewals that increase the scope of the existing license to a new or higher fee category will require a fee.

FEE
CATEGORY

AMOUNT
ENCLOSED \$

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

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

THE APPLICANT AND ANY OFFICIAL EXECUTING THIS CERTIFICATION ON BEHALF OF THE APPLICANT, NAMED IN ITEM 2, CERTIFY THAT THIS APPLICATION IS PREPARED IN CONFORMITY WITH TITLE 10, CODE OF FEDERAL REGULATIONS, PARTS 30, 32, 33, 34, 35, 36, 37, 39, AND 40, AND THAT ALL INFORMATION CONTAINED HEREIN IS TRUE AND CORRECT TO THE BEST OF THEIR KNOWLEDGE AND BELIEF.

WARNING: 18 U.S.C. SECTION 1001 ACT OF JUNE 25, 1948 62 STAT. 749 MAKES IT A CRIMINAL OFFENSE TO MAKE A WILLFULLY FALSE STATEMENT OR REPRESENTATION TO ANY DEPARTMENT OR AGENCY OF THE UNITED STATES AS TO ANY MATTER WITHIN ITS JURISDICTION.

CERTIFYING OFFICER -- TYPED/PRINTED NAME AND TITLE

Peter Luthiger - COO

SIGNATURE

peter luthiger

DATE

1 Mar 2024

FOR NRC USE ONLY

TYPE OF FEE	FEE LOG	FEE CATEGORY	AMOUNT RECEIVED	CHECK NUMBER	COMMENTS
APPROVED BY				DATE	

Powertech USA Inc. SUA 1600
NRC Form 313
Supplemental Information Items 5-12

5. Radioactive Material.
 - a. Element and Mass Number = Natural Uranium,
 - b. Chemical and Physical Form = Any Unspecified
 - c. Maximum Amount that Licensee May Possess at Any One Time = Unlimited, Quantity generated under operation authorized by SAU 1600
6. Purpose(s) for Which Licensed Material Will Be Used.
 - a. Uranium Recovery and processing.
7. Individual(s) Responsible For radiation Safety Program and Their Training Experience.
 - a. Responsible individual(s) and their training experience will be provided as per U.S. Nuclear Regulatory Commission Materials License SUA 1600, Preoperational Condition 12.5.
8. Training For Individuals Working In Or Frequenting Restricted Areas.
 - a. See Dewey-Burdock Application for NRC Uranium Recovery License, Fall River and Custer Counties, South Dakota, Technical Report (December 2013), Section 5.5 and U.S. Nuclear Regulatory Commission Materials License SUA 1600, Conditions 9.6, 10.4, 10.14, 12.5 and 12.14.
9. Facilities And Equipment.
 - a. See Dewey-Burdock Application for NRC Uranium Recovery License, Fall River and Custer Counties, South Dakota, Technical Report (December 2013) Sections 3.0, and NRC Safety Evaluation Report for the Dewey-Burdock Project Fall River and Custer Counties (April 2014), Section 3.0.
10. Radiation Safety Program.
 - a. See Dewey-Burdock Application for NRC Uranium Recovery License, Fall River and Custer Counties, South Dakota, Technical Report (December 2013), Sections 5.4, 5.5 and 5.7; NRC Safety Evaluation Report for the Dewey-Burdock Project Fall River and Custer Counties (April 2014), Sections 5.4, 5.5, and 5.7, and U.S. Nuclear Regulatory Commission Materials License SUA 1600, Conditions 9.6, 9.7, 10.4, 10.3, 10.13, 10.14, 11.2, 12.5, 12.16, 12.17, 12.18, 12.19, 12.20, 12.21 and 12.22
11. Waste Management.
 - a. See Dewey-Burdock Application for NRC Uranium Recovery License, Fall River and Custer Counties, South Dakota, Technical Report (December 2013), Sections 4.2, 4.3 and 4.4; NRC Safety Evaluation Report for the Dewey-Burdock Project Fall River and Custer Counties (April 2014),

Section 4.2 and U.S. Nuclear Regulatory Commission Materials License SUA 1600, Conditions 9.6, 9.9 and 12.6.

12. License Fee Category.

a. Full Cost.

Dewey-Burdock Project
License Renewal Application for SUA-1600
Cross Reference for Combined Technical Report/Environmental Report

Section Title	Technical Report 2009, Revised 2014	Updated supplemental information provided in the combined ER/TR?	SUA-1600 License Conditions	Notes
Proposed Activities				
Licensing Action Requested	Sec 1.1	Yes		Updated licensing action request
Corporate Entities	Sec 1.3	Yes		Revised Corporate Entities
Surety Arrangements	Sec 1.12	Yes	LC 9.5	Made consistent with SUA-1600 LC 9.5
Site Characterization				
Site Location and Layout	Sec 2.1	No	LC 9.2	As there have been no activities at the site, evaluations presented in original approved TR on the site characterization has not changed
Uses of Adjacent Lands and Waters	Sec 2.2	Yes	LC 12.15, 11.8	Updated Agriculture Census data. No new residences or wells within 2 km of Project Area. Preoperational conditions in SUA-1600 Section 12 are required prior to commencement of operations.
Population Distribution	Sec 2.3	Yes		Updated population and demographic data with 2020 Census, updated labor force, employment, taxes, housing, and environmental justice. Updated Figure 2.3-1.
Historic, Scenic, and Cultural Resources	Sec 2.4, Appendix 2.4-A & 2.4-B	Yes	LC 9.8	Updated to include Programmatic Agreement.
Meteorology	Sec 2.5, Appendix 2.5-A, 2.5-B, 2.5-C, 2.5-D, 2.5-E & 2.5-F	No	LC 12.8	Preoperational conditions in SUA-1600 Section 12 are required prior to commencement of operations.
Geology and Seismology	Sec 2.6, Appendix 2.6 A-G	Yes		Updated seismology.
Hydrology	Sec 2.7, Appendix 2.7 A-J	No	LC 10.10B, 10.12, 12.7, 12.9 & 12.10	As there have been no activities at the site, evaluations presented in original approved TR on the site characterization has not changed. Preoperational conditions in SUA-1600 Section 12 are required prior to commencement of operations.
Ecology	Sec 2.8, Appendix 2.8 A-J	Yes		Updated Threatened, Endangered, or Candidate Species and Species Tracked by SDNHP (Section 2.8.5.5).
Background Radiological Characteristics	Sec 2.9, Appendix 2.9-A	No	LC 12.11	As there have been no activities at the site, evaluations presented in original approved TR on the site characterization has not changed. Preoperational conditions in SUA-1600 Section 12 are required prior to commencement of operations.

Section Title	Technical Report 2009, Revised 2014	Updated supplemental information provided in the combined ER/TR?	SUA-1600 License Conditions	Notes
Description of Proposed Facility				
In Situ Leach Process and Equipment	Sec 3.1	No	LC 9.5, 10.1, 10.2, 10.5, 10.10 (A&B), 10.11, 11.1 . 11.2, 11.3, 11.4, 11.5, 11.6, 11.7, 11.8, 12.12	As there have been no activities at the site, evaluations presented in original approved TR on the description of the proposed facility has not changed.
Recovery Plant, Satellite Processing Facilities, Well Fields and Chemical Storage Facilities - Equipment Used and Materials Processed	Sec 3.2	No		As there have been no activities at the site, evaluations presented in original approved TR on the description of the proposed facility has not changed.
Instrumentation Control	Sec 3.2.12	No	LC 12.13	As there have been no activities at the site, evaluations presented in original approved TR on the description of the proposed facility has not changed.
Effluent Control Systems				
Gaseous and Airborne Particulates	Sec 4.1	No	LC 12.13	As there have been no activities at the site, evaluations presented in original approved TR on the effluent control system has not changed.
Liquids and Solids	Sec 4.2 & 4.4	No	LC 10.12, 11.7, & 12.25	As there have been no activities at the site, evaluations presented in original approved TR on the effluent control system has not changed.
Contaminated Equipment	Sec 4.4	No	LC 12.20, & 12.21	As there have been no activities at the site, evaluations presented in original approved TR on the effluent control system has not changed.
Operations				
Corporate Organization and Administrative Procedures	Sec 5.1	No		As there have been no activities at the site, evaluations presented in original approved TR regarding operations has not changed
Management Control Program	Sec 5.2	No	LC 11.6	As there have been no activities at the site, evaluations presented in original approved TR regarding operations has not changed
Management Audit and Inspection Program	Sec 5.3	No	LC 9.6	As there have been no activities at the site, evaluations presented in original approved TR regarding operations has not changed
Qualification for Personnel Conducting the Radiation Safety Program	Sec 5.4	No	LC 9.7	As there have been no activities at the site, evaluations presented in original approved TR regarding operations has not changed
Radiation Safety Training	Sec 5.5	No	LC 10.14	As there have been no activities at the site, evaluations presented in original approved TR regarding operations has not changed
Security	Sec 5.6	No		As there have been no activities at the site, evaluations presented in original approved TR regarding operations has not changed

Section Title	Technical Report 2009, Revised 2014	Updated supplemental information provided in the combined ER/TR?	SUA-1600 License Conditions	Notes
Radiation Safety Controls and Monitoring	Sec 5.7.1 through 5.7.9	No	LC 10.13, 11.2, 11.3, 11.4, 11.5, 11.6, 12.16, 12.17, 12.18, 12.19, 12.20, 12.21, 12.22 (A-D), 12.24	As there have been no activities at the site, evaluations presented in original approved TR regarding operations has not changed
Ground-Water Quality Restoration, Surface Reclamation and Facility Decommissioning				
Plans and Schedules for Ground-Water Quality Restoration	Sec 6.1	No	LC 9.5 & LC 10.6	As there have been no activities at the site, evaluations presented in original approved TR on ground-water quality restoration, surface reclamation and facility decommissioning has not changed
Plans and Schedules for Reclaiming Disturbed Lands	Sec 6.2	No	LC 10.3 & LC 12.23	As there have been no activities at the site, evaluations presented in original approved TR on ground-water quality restoration, surface reclamation and facility decommissioning has not changed
Procedures for Removing and Disposing of Structures and Equipment	Sec 6.3	No		As there have been no activities at the site, evaluations presented in original approved TR on ground-water quality restoration, surface reclamation and facility decommissioning has not changed
Methodologies for Conducting Post-Reclamation and Decommissioning Radiological Surveys	Sec 6.4, Appendix 6.4-A	No	LC 10.3	As there have been no activities at the site, evaluations presented in original approved TR on ground-water quality restoration, surface reclamation and facility decommissioning has not changed
Financial Assurance	Sec 6.6, Appendix 6.6-A	No	LC 9.5	As there have been no activities at the site, evaluations presented in original approved TR on ground-water quality restoration, surface reclamation and facility decommissioning has not changed
Environmental Effects				
Potential Environmental Effects of the Site Preparation and Construction	Sec 7.1	No	License Conditions - Section 10 - Operations, Controls, Limits and Restrictions: Section 11 - Monitoring, Recording and Bookkeeping. Requirements and Section 12 - Preoperational Conditions, all list multiple conditions	As there have been no activities at the site, evaluations presented in original approved TR on environmental effects has not changed
Potential Environmental Effects of Operations	Sec 7.2	No		As there have been no activities at the site, evaluations presented in original approved TR on environmental effects has not changed
Potential Radiological Effects	Sec 7.3	No		As there have been no activities at the site, evaluations presented in original approved TR on environmental effects has not changed
Potential Non-Radiological Effects	Sec 7.4	No		As there have been no activities at the site, evaluations presented in original approved TR on environmental effects has not changed
Potential Effects of Accidents	Sec 7.5	No		As there have been no activities at the site, evaluations presented in original approved TR on environmental effects has not changed
Potential Economic and Social Effects of Construction and Operation	Sec 7.6	Yes		Updated for consistency with updates made to Section 2.3.
Environmental Justice	Sec 7.7	Yes		Updated for consistency with updates made to Section 2.3.4.

Section Title	Technical Report 2009, Revised 2014	Updated supplemental information provided in the combined ER/TR?	SUA-1600 License Conditions	Notes
Alternatives to Proposed Action				
No-Action Alternative	Sec 8.1	No	Sec 2.1 - 2.4	As there have been no activities at the site, evaluations presented in original approved TR on alternatives to proposed action has not changed
Proposed Action	Sec 8.2	No		As there have been no activities at the site, evaluations presented in original approved TR on alternatives to proposed action has not changed
Reasonable Alternatives	Sec 8.3	No		As there have been no activities at the site, evaluations presented in original approved TR on alternatives to proposed action has not changed
Eliminated Alternatives	Sec 8.4	No		As there have been no activities at the site, evaluations presented in original approved TR on alternatives to proposed action has not changed
Cumulative Effects	Sec 8.5	No		As there have been no activities at the site, evaluations presented in original approved TR on alternatives to proposed action has not changed
Comparison of the Predicted Environmental Impacts	Sec 8.6	No		As there have been no activities at the site, evaluations presented in original approved TR on alternatives to proposed action has not changed
Cost-Benefit Analysis				
Introduction	Sec 9.1	No	Sec 8.1 - 8.4	The basic assumptions in the Cost-Benefit Analysis have not changed, over time, economic indicators change, they are different now compared to 2014 and will be different in 2-4 years. Powertech is in the process of developing an updated Preliminary Economic Assessment which will provide some updated economic indicators that were used in the original Cost-Benefit Analysis. Based on the
Alternatives and Assumptions	Sec 9.2	No		
Economic Benefits of Project Construction and Operation	Sec 9.3	No		
External Costs of Project Construction and Operation	Sec 9.4	No		
Cost-Benefit Summary	Sec 9.5	No		
Environmental Approvals and Consultations				
Applicable Regulatory Requirements, Permits, and Required	Sec 10.1	Yes		Tables 10.1.1 has been updated
Environmental Consultation	Sec 10.2	No		
Appendix				
2.6-G USGS Earthquake Database Results				Updated for consistency with updates made to Section 2.6.