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January 7, 2002

Kathy Dolce Modes
Health Physicist
Nuclear Materials Safety Branch 2
Division of Nuclear Materials Safety
Nuclear Regulatory Commission
Region 1
475 Allendale Road
King of Prussia, PA 19406-1415

MS 16

P-3

37-28639-01

Dear Kathy Dolce Modes,

Subject: Mail Control No 130621 Docket No 03032156

This letter is in response to your letter concerning request for additional information concerning the application for renewal of license control number 130621. Two copies of this information are enclosed.

Question 1

Please find enclosed with this letter, Appendix B from the NUREG-1556 Volume 4 book to address your question along with a detail listing of the sealed source and device model numbers.

Question 2

The sealed source and device model numbers are in the first section of Appendix B, enclosed.

Question 3

Neither Kim Olszewski or Steve Everson have had any of this training. Chuck Morgan has had this training. Therefore, Chuck Morgan will be the interim RSO until the position of Electrical Engineer has been filled and the individual as received the appropriate training. When this is completed, NRC will be informed as the name of the new RSO and be presented the certificate of the completed training.

Question 4

The facility will maintain records of receipt, transfer, and disposal of fixed gauges and physical inventories will be conducted at least every 6 months or at other intervals approved by NRC, to account for all sealed sources and devices received and possessed under the license.

Records will be kept according to the following schedule:

Type of Record	How long record must be maintained
Receipt	For as long as the material is possessed until 3 years after transfer and disposal
Transfer	For 3 years after transfer
Disposal	Until NRC terminates the license
Important to Decommissioning	Until the site is released for unrestricted use

130621

January 7, 2002

If you need any further information, please contact me at 570-524-8458.

I look forward to a successful renewal of our license.

Sincerely,

A handwritten signature in cursive script that reads "Steve Everson".

Steve Everson
Maintenance/Environmental/Project Leader
BBA Nonwovens

Suggested Format for Providing Information Requested in Items 5 Through 11 of NRC Form 313

Table B.1 Items 5 & 6: Materials To Be Possessed and Proposed Uses

Yes	No	Radioisotope	Manufacturer or Distributor Model No.	Quantity	Use As Listed on SSD Certificate	Specify Other Uses Not Listed on SSD Certificate
	X	Cobalt-60	Sealed source manufacturer or distributor and model number: Device manufacturer or distributor and model number:	Not to exceed either the maximum activity per source or maximum activity per device as specified in Sealed Source and Device Registration Certificate	Yes [] Specific description of the gauge use: _____ _____ _____ _____	[] Not applicable [] Uses are: _____ (Submit safety analysis supporting safe use)
X		Krypton-85 SEE ATTACHED LIST	Sealed source manufacturer or distributor and model number: Device manufacturer or distributor and model number:	Not to exceed either the maximum activity per source or maximum activity per device as specified in Sealed Source and Device Registration Certificate	Yes [X] Specific description of the gauge use: USE TO MEASURE BASIS WEIGHT OF NONWOVEN SHEET MAKING PROCESS _____ _____ _____	[] Not applicable [] Uses are: _____ (Submit safety analysis supporting safe use)
	X	Strontium-90	Sealed source manufacturer or distributor and model number: Device manufacturer or distributor and model number:	Not to exceed either the maximum activity per source or maximum activity per device as specified in Sealed Source and Device Registration Certificate	Yes [] Specific description of the gauge use: _____ _____ _____ _____	[] Not applicable [] Uses are: _____ (Submit safety analysis supporting safe use)
	X	Cesium-137	Sealed source manufacturer or distributor and model number: Device manufacturer or distributor and model number:	Not to exceed either the maximum activity per source or maximum activity per device as specified in Sealed Source and Device Registration Certificate	Yes [] Specific description of the gauge use: _____ _____ _____ _____	[] Not applicable [] Uses are: _____ (Submit safety analysis supporting safe use)

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Yes	No	Radioisotope	Manufacturer or Distributor Model No.	Quantity	Use As Listed on SSD Certificate	Specify Other Uses Not Listed on SSD Certificate
	<input checked="" type="checkbox"/>	Americium-241	Sealed source manufacturer or distributor and model number: _____ Device manufacturer or distributor and model number: _____	Not to exceed either the maximum activity per source or maximum activity per device as specified in Sealed Source and Device Registration Certificate	Yes <input type="checkbox"/> Specific description of the gauge use: _____ _____ _____ _____ _____	<input type="checkbox"/> Not applicable <input type="checkbox"/> Uses are: _____ (Submit safety analysis supporting safe use)
	<input checked="" type="checkbox"/>	Other Isotope (Specify):	Sealed source manufacturer or distributor and model number: _____ Device manufacturer or distributor and model number: _____	Not to exceed either the maximum activity per source or maximum activity per device as specified in Sealed Source and Device Registration Certificate	Yes <input type="checkbox"/> Specific description of the gauge use: _____ _____ _____ _____ _____	<input type="checkbox"/> Not applicable <input type="checkbox"/> Uses are: _____ (Submit safety analysis supporting safe use)
Financial Assurance Required and Evidence of Financial Assurance Provided						

Table B.2 Items 7 Through 11: Training and Experience, Facilities and Equipment, Radiation Safety Program, and Waste Disposal

Item No. and Title	Suggested Response	Yes	Alternative Procedures Attached
<p>7. Individual(s) Responsible For Radiation Safety Program And Their Training And Experience</p> <p>7.1 Radiation Safety Officer</p> <p>Name: <u>CHUCK MORGAN</u></p>	<p>Before obtaining licensed materials, the proposed RSO will have successfully completed the training described in Criteria in the section entitled "Individual(s) Responsible for Radiation Safety Program and Their Training and Experience - Radiation Safety Officer" in NUREG-1556, Vol. 4, dated October 1998.</p> <p>AND</p> <p>Before being named as the RSO, future RSOs will have successfully completed the training described in Criteria in the section entitled "Individual(s) Responsible for Radiation Safety Program and Their Training and Experience - Radiation Safety Officer" in NUREG-1556, Vol. 4, dated October 1998. Within 30 days of naming a new RSO, we will submit the new RSO's name to NRC to include in our license.</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>7. Individual(s) Responsible For Radiation Safety Program And Their Training And Experience</p> <p>7.2 Authorized Users - <u>CHUCK MORGAN</u></p>	<p>PROPOSED AUTHORIZED USERS:</p> <p>Before using licensed materials, authorized users will have successfully completed the training described in Criteria in the section entitled, "Authorized Users" in NUREG-1556, Vol. 4, dated October 1998.</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>8. Training for Individuals Who in the Course of Employment are Likely to Receive Occupational Doses of Radiation in Excess of 1 mSv (100 mrem) in a Year (Occupationally Exposed Workers) and Ancillary Personnel</p>	<p>The applicant is <i>not</i> required to, and should not, submit is training program, for individuals who in the course of employment are likely to receive occupational doses of radiation in excess of 1 mSv (100 mrem) in a year (occupationally exposed workers) and ancillary personnel, to the NRC for review during the licensing phase.</p>	Need Not Be Submitted with Application	
<p>9. Facilities and Equipment</p>	<p>We will ensure that the location of each fixed gauge meets the Criteria in the section entitled "Facilities and Equipment" in NUREG-1556, Vol. 4, dated August 1998.</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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Item No. and Title	Suggested Response	Yes	Alternative Procedures Attached
10. Radiation Safety Program - Audit Program	The applicant is <i>not</i> required to, and should not, submit its audit program to the NRC for review during the licensing phase.	Need Not Be Submitted with Application	
10. Radiation Safety Program - Survey Instruments	<p>Surveys pursuant to 10 CFR 20.1501 will be performed by a person specifically authorized by the NRC or an Agreement State to perform these surveys.</p> <p style="text-align: center;">OR</p> <p>We will use instruments that meet the Criteria in the section entitled "Radiation Safety Program - Instruments," in NUREG-1556, Vol. 4, dated August 1998, and <i>one</i> of the following:</p> <p style="padding-left: 40px;">Each survey meter will be calibrated by the manufacturer or other person authorized by the NRC or an Agreement State to perform survey meter calibrations.</p> <p style="text-align: center;">OR</p> <p>We will implement the model survey instrument calibration program in Appendix I to NUREG-1556, Vol. 4, dated August 1998.</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
10. Radiation Safety Program - Material Receipt and Accountability	Physical inventories will be conducted at intervals not to exceed 6 months or at other intervals approved by the NRC, to account for all sealed sources and devices received and possessed under the license.	<input checked="" type="checkbox"/>	<input type="checkbox"/>
10. Radiation Safety Program - Occupational Dosimetry	We will perform a prospective evaluation demonstrating that unmonitored individuals are not likely to receive, in one year, a radiation dose in excess of 10% of the allowable limits in 10 CFR Part 20 or we will provide dosimetry that meets the Criteria in the section entitled "Radiation Safety Program - Occupational Dosimetry," in NUREG-1556, Vol. 4, dated August 1998.	<input type="checkbox"/>	<input type="checkbox"/>
10. Radiation Safety Program - Public Dose	The applicant is not required to submit a response to the public dose section during the licensing phase. However, during NRC inspections, licensees must be able to provide documentation demonstrating, by measurement or calculation, that the total effective dose equivalent to the individual likely to receive the highest dose from the licensed operation does not exceed the annual limit for individual members of the public.	Need Not Be Submitted with Application	

Item No. and Title	Suggested Response	Yes	Alternative Procedures Attached
10. Radiation Safety Program - Operating & Emergency Procedures	<p>If the gauge meets one or more of the safety conditions specified in "Discussion," in the section entitled "Radiation Safety Program-Operating Emergency Procedures," in NUREG 1556, Vol. 4, dated August 1998 state the following:</p> <p>Operating and emergency procedures will be developed, implemented, maintained, and distributed, and will meet the Criteria in the section entitled "Radiation Safety Program - Operating and Emergency Procedures," in NUREG-1556, Vol. 4, dated August 1998.</p> <p>For each gauge requested that does not meet one or more of the safety conditions specified in "Discussion," in the section entitled "Radiation Safety Program-Operating Emergency Procedures," in NUREG 1556, Vol. 4, dated August 1998 provide your operating, emergency and lock-out (if applicable) procedures to NRC for review.</p>	<p><input checked="" type="checkbox"/></p> <p><input type="checkbox"/> Procedures Attached</p>	<p><input type="checkbox"/></p>
10. Radiation Safety Program - Leak Test	<p>Leak tests will be performed at intervals approved by the NRC or an Agreement State and specified in the Sealed Source and Device Registration Certificate. Leak tests will be performed by an organization authorized by NRC or an Agreement State to provide leak testing services for other licensees or using a leak test kit supplied by an organization authorized by NRC or an Agreement State to provide leak test kits to other licensees and according to the kit supplier's instructions.</p> <p style="text-align: center;">OR</p> <p>We will implement the model leak test program published in Appendix M to NUREG-1556, Vol. 4, dated August 1998.</p>	<p><input checked="" type="checkbox"/></p> <p><input type="checkbox"/></p>	<p><input type="checkbox"/></p>

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Item No. and Title	Suggested Response	Yes	Alternative Procedures Attached
10. Radiation Safety Program - Maintenance	<p><u>ROUTINE MAINTENANCE</u> We will implement and maintain procedures for routine maintenance of our fixed gauges according to each manufacturer's or distributor's written recommendations and instructions.</p> <p><u>NON-ROUTINE MAINTENANCE OPERATIONS</u> The gauge manufacturer, distributor or other person authorized by NRC or an Agreement State will perform non-routine operations such as installation, initial radiation survey, repair, and maintenance of components related to the radiological safety of the gauge, gauge relocation, replacement, and disposal of sealed sources, alignment, or removal of a gauge from service.</p>	<input checked="" type="checkbox"/>	<p><input type="checkbox"/></p> <p><input type="checkbox"/> The information listed in Appendix N supporting a request to perform non-routing operations in-house is attached</p>
10. Radiation Safety Program - Transportation	The applicant is <i>not</i> required to submit its response to transportation during the licensing process; this issue will be reviewed during inspection. However, the licensee should develop, implement, and maintain transportation procedures according to NRC and DOT regulations.	Need Not Be Submitted with Application	
10. Radiation Safety Program - Fixed Gauges Used at Temporary Job Sites	<p>This is not applicable to our program. We will not use fixed gauges at temporary job sites.</p> <p style="text-align: center;">OR</p> <p>We will develop, implement, maintain and distribute procedures that meet the Criteria in the section entitled "Radiation Safety Program - Fixed Gauges Used at Temporary Job Sites" in NUREG-1556, Vol. 4, dated August 1998.</p>	<p><input checked="" type="checkbox"/> Not Applicable</p> <p><input type="checkbox"/></p>	<p><input type="checkbox"/></p>
10. Radiation Safety Program - Minimization of Contamination	The applicant is not required to submit a response to minimization of contamination if the applicant's responses meet the criteria for the following sections: Radioactive Material - Sealed Sources and Devices, Facilities and Equipment, Radiation Safety Program - Operating and Emergency Procedures, Radiation Safety Program - Leak Testing, and Waste Management - Gauge Transfer and Disposal.	Need Not Be Submitted with Application	

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Item No. and Title	Suggested Response	Yes	Alternative Procedures Attached
11. Waste Management - Gauge Disposal & Transfer	The applicant is not required to submit a response to waste management during the licensing process. However, the licensee should develop, implement, and maintain gauge transfer and disposal procedures in its radiation protection program.	Need Not Be Submitted with Application	

APPENDIX B TABLE B.1 Items 5 & 6 Materials To be Possessed and Proposed Uses

BBA Reference	Device Model	Device Serial #	Source Serial #	Isotope	Date Installed	Quantity
WF 1	U-7 S-11					
Frame		972242631	K-1753-P	Kr-85	08/01/00	250mCi
DL6	O-5 S-11					
Frame		383194632	K-1269-P	Kr-85	05/01/96	9.3GBq
DL8	O-5 S-11					
Frame		383194631	K-1262-P	Kr-85	05/01/96	9.3GBq
DL1	5001-S-70-A	5301				
Frame	SCL-77A	2906				
Detector	HU557	1430	9523	Kr-85	01/31/94	1200mCi
DL3	5001-S-70-A	5591				
Frame	SCL-77A	2834				
Detector	HU557	102	9540	Kr-85	06/20/94	1200mCi
DL5	5001-S-70-A	5305				
Frame	SCL-77A	2939				
Detector	HU557	1425	9531	Kr-85	01/31/94	1200mCi
DL7	5001-S-70-A	5308				
Frame	SCL-77A	2930				
Detector	HU557	100	9532	Kr-85	01/31/94	1200mCi
WF2	4 x 4 S-70A	13002				
Frame	SCL-77A	2836				
Detector	HU557	1379	9586	Kr-85	03/23/98	1200mCi