

To: Ms Kathy Modes - NRC Fax: 610-337-5269

From: Allen Smith - AGY

MS16

P-3

37-30750-01  
03036072

Re: Request for "UNBOLTING AND BOLTING OF  
NUCLEAR GAUGING DEVICES"  
Modification.

Ms. Modes,

Please find attached, answers (addendum) to  
the procedure noted above

Thanks,

Allen Smith

Smith  
3/12/05  
@ 11:35a

136208



HUNTINGDON PLANT  
1200 Susquehanna Avenue  
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United States Nuclear Regulatory Commission  
Nuclear Materials Safety Branch  
475 Allendale Road  
King of Prussia, PA 19406

March 16, 2005

Attn: Ms. Kathy Modes  
Re: Update to Request for Information  
Mail Control Number 136208

*37-30750-01  
02036072*

Dear Ms. Modes,

Advanced Glassfiber Yarns, LLC (AGY) is providing information in support of your questions regarding NUREG 1556, Volume 4, Appendix N.

- Q Identify who will perform non-routine maintenance.
- A At the present time only Allen Smith, the proposed Radiation Safety Officer, or properly licensed facilities shall conduct the requested operations.
  
- Q Ensure that doses to personnel and the public are within limits and ALARA.
- A The AGY procedure stipulates that non-essential personnel shall be removed from the area and that the shutter mechanism secured closed during authorized non-routine maintenance.
  
- Q Ensure the source is secured or under constant surveillance
- A AGY personnel shall ensure that the licensed device is secured from theft and unauthorized access or under constant surveillance during all routine and non-routine operations
  
- Q Ensure appropriate labels and signs are used.
- A Conspicuous labels and cautions signs shall be in place
  
- Q Ensure that manufacturer's instructions and recommendations are followed.
- A AGY personnel shall ensure that non-routine operations are conducted as per available manufacturer instructions and approved procedures.
  
- Q Ensure that replacement parts are provided by the manufacturer or evaluated to verify that there would be no degrading of engineering safety evaluation.
- A AGY personnel will contract with the device manufacturer, distributor or another licensed facility for repair or replacement of safety related components.

- Q Confirm that individuals performing non-routine maintenance will wear whole body and extremity monitoring or demonstrate that unmonitored individuals will not receive in excess of 10% of annual limits.
- A Radiation levels at 30 cm from the shielding of Berthold Model LB7440F devices containing 50 mCi of Cs-137 were measured at 0.4 mR/hour. Radiation levels at the surface of shielding were measured at 5.0 mR/hour. Installation/removal, alignment, etc. are not expected to take longer than 0.5 hours per task. If the same individual conducted this task 50 times in a calendar year (well above anticipated need), exposures to whole body and extremities would be well below the requirement for monitoring.
- Q Verify that at least one radiation survey meter meeting the NUREG 1556, Volume 4 criteria is available during non-routine maintenance.
- A AGY maintains at least one radiation survey meter that meets acceptance criteria.
- Q What steps are taken to ensure radiation levels in non-routine maintenance areas do not exceed 10CFR20.1301 limits?
- A Radiation surveys shall be conducted with a calibrated survey meter prior to, during and upon completion of non-routine maintenance. The surveys should include shutter-closed verification prior to removal, exposures to individuals during removal/transfer, and shutter open levels following installation as per the operating procedure and license condition.