



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION IV
611 RYAN PLAZA DRIVE, SUITE 400
ARLINGTON, TEXAS 76011-4005

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FACSIMILE

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FOR: Ken Pollock, Nuclear Testing Services

FROM: JIM MONTGOMERY
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SUBJECT: NRC License Renewal Additional Information Needed

As per our telephone conversation this morning, pls. provide the additional information as noted in the checked (✓) paragraphs of the attached "Appendix G" from NRC document NUREG-1556, Vol. 1, Rev. 1. If you have any questions pls. call or e-mail and fax info. back to me at the above number. Pls. be sure to sign and date your response.

THANKS, JIM MONTGOMERY

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Non-routine maintenance or repair (beyond routine cleaning and lubrication) involves detaching the source or source rod from the device and any other activities during which personnel could receive radiation doses exceeding NRC limits (see Figure 8.7). If this maintenance or repair is not performed properly, with attention to good radiation safety principles, the gauge may not operate as designed and personnel performing these tasks could receive radiation doses exceeding NRC limits.

A typical moisture-density gauge contains 0.37 gigabecquerels (10 millicuries) of cesium-137 and 1.5 gigabecquerels (40 millicuries) of americium-241 as a neutron source. In about 9 minutes, an unshielded cesium-137 source of this activity can deliver 0.05 sievert (5 rems) to a worker's hands or fingers (i.e., extremities), assuming the extremities are 1 centimeter from the source. Some gauges contain sources of even higher activities with correspondingly higher dose rates. The threshold for extremity monitoring is 0.05 sievert (5 rems) per year.

Thus, applicants wishing to perform non-routine maintenance must use personnel with special training and follow appropriate procedures consistent with the manufacturer's instructions and recommendations that address radiation safety concerns (e.g., use of radiation survey meter, shielded container for the source, personnel dosimetry). Accordingly, applicants must provide the following information:

- Describe the types of work, maintenance, cleaning, repair, etc., to be performed that necessitate detaching the source or source rod from the device or that could cause personnel to receive radiation doses exceeding NRC limits. The principal reason for obtaining this information is to assist in the evaluation of the qualifications of individuals who will conduct the work and the radiation safety procedures they will follow.
- Identify who will perform non-routine maintenance, their training and experience, and why they are competent to perform non-routine maintenance.
- Submit procedures for safe handling of the radioactive source while the source or source rod is detached from the gauge. These procedures should ensure the following:
 - Doses to personnel and members of the public are within regulatory limits and ALARA (e.g., use of shielded containers or shielding);
 - The source or source rod is secured against unauthorized removal access or is under constant surveillance;
 - Appropriate labels and signs are used; and
 - Manufacturer's instructions and recommendations are followed.
- ✓ • Confirm that individuals performing non-routine maintenance on gauges will always wear both whole-body- and extremity-monitoring devices or that an evaluation will be available to demonstrate that these individuals are not likely to receive, in one year, more than 10 percent of the applicable dose limits. The dose limits are illustrated in Figure 8.3.

APPENDIX G

- ✓ • Verify possession of at least one survey instrument meeting the following criteria:
 - Be capable of detecting gamma radiation;
 - Be capable of measuring from 0.01 to 0.5 mSv/hr [1 to 50 mrem/hr];
 - Be calibrated at least annually with radionuclide point sources emitting radiation of the type and energy of the sealed sources in the gauge;
 - Be calibrated at at least 2 points, each located at approximately one-third and two-thirds of each scale; readings within ± 20 percent are acceptable;
 - Be calibrated by a person specifically licensed by NRC or an Agreement State to calibrate radiation detection instruments; and
 - Be checked for functionality prior to use (e.g., with the gauge or a check source).

Note: Records of instrument calibration must be maintained for 3 years after the record is made. [10 CFR 20.2103]

- ✓ • Describe steps to be taken to ensure that radiation levels in areas where non-routine maintenance will take place do not exceed 10 CFR 20.1301 limits. For example, applicants can do the following:
 - Commit to performing surveys with a survey instrument (as described above);
 - Specify where and when surveys will be conducted during non-routine maintenance; and
 - Commit to maintaining, for 3 years from the date of the survey, records of the survey (e.g., who performed the survey, date of the survey, instrument used, measured radiation levels correlated to location of those measurements), as required by 10 CFR 20.2103.