

TELEPHONE CONVERSATION

To: Mr. Chris Kennedy
From: Rachel Browder *RB*
Date: October 12, 2005
Subject: New License Clarifications and Request for Additional Information

Docket: 030-37023
License: 50-29212-01
Control: 470682

The following items were discussed regarding your new license application for Teck-Pogo Inc., Pogo Mine Joint Venture.

1. Additional sources as delineated on the Sealed Source Device Registry for the Ronan SA-1 gamma gauge for Cs-137 will be added to the authorization in Item 7.
2. ✓ Clarification for Item 17 regarding what activities would be authorized on the license for Chris Kennedy and others who are trained to perform such authorized activities. (Acceptable training would include manufacturer's or distributor's courses for non-routine operations or equivalent.) Please commit to the training that would be provided to other authorized personnel.

- ✓ Please provide a request for removal, relocation and radiation surveys of the gauge.

Please provide procedures for removal, relocating and performing surveys of the gauge. The procedures should include a statement that doses to personnel performing activities are within regulatory limits and ALARA will be implemented. You should monitor the dose and provide dosimetry as required.

Please provide statement that the sources will be secured against unauthorized removal or access or under constant surveillance.

- ✓ Please provide statement that manufacturer's or distributors instructions and recommendations will be followed when implementing non-routine operations.

- ✓ Please provide a statement that any non-manufacturer/non-distributor supplied replacement components or parts, or the use of materials, (e.g., lubricants) other than those specified or recommended by the manufacturer or distributor are evaluated to

ensure that they do not degrade the engineering safety analysis performed and accepted as part of the device registration.

Please provide a statement that before returning the gauge to routine use, the gauge is tested to verify that it functions as designed and source integrity is not compromised.

Confirm that individuals performing non-routine operations on gauges will wear both whole body and extremity monitoring devices or perform a prospective evaluation demonstrating that unmonitored individuals performing non-routine operations are not likely to receive, in one year, a radiation dose in excess of 10% of the allowable limits.

Describe steps to be taken to ensure that radiation levels in areas where non-routine operations will take place do not exceed 10 CFR 20.1301 limits. For example, applicants can do the following:

- commit to perform survey with a survey instrument.
- specify where and when surveys will be conducted during non-routine operations.
- commit to maintaining, for 3 years from the date of the survey, records of the survey, instruments used, measured radiation levels correlated to the location of those measurements, as required by 10 CFR 20.2103.

I appreciate your cooperation.

A handwritten signature in black ink that reads "Rachel S. Browder". The signature is written in a cursive style with a large, stylized initial "R".

Rachel Browder