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June 27, 2006

NH883

Division of Nuclear Materials Safety Branch 2  
U.S. Nuclear Regulatory Commission, Region I  
475 Allendale Road  
King of Prussia, PA 19406-1415

Subject: **Application for Amendment to License**  
Reference: **License Number 37-30089-01**

03033342

This letter is to request a license amendment for the following changes:

1. Bradley Knight, Plant Engineer, is being named Radiation Safety Officer as of July 1, 2006. He is replacing Jeff Melat.
2. Bradley Knight is also applying for non-routine maintenance under Appendix N of NUREG-1556. Bradley's qualifications include attending the 40 hour radiation safety course at Ohmart Vega, attended Radiological Control Maintenance School in Ballston Spa, NY, served six years as a nuclear mechanical operator in the US Navy, and has a BS in Chemistry and an AS in Nuclear Technology. The non-routine maintenance Bradley would be performing includes installation, relocation, and alignment of gauges.
3. Procedures to be followed for non-routine maintenance include:  
Doses to personnel and members of the public are within regulatory limits and ALARA (e.g., use of shielded containers or shielding); the source is secured against unauthorized removal or access or under constant surveillance; appropriate labels and signs are used; manufacturer's or distributors instructions and recommendations are followed; 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; and before being returned to routine use, the gauge is tested to verify that it functions as designed and source integrity is not compromised.
4. Bradley Knight will perform a prospective evaluation demonstrating that while performing non-routine operations he is not likely to receive, in one year, a radiation dose in excess of 10% of the allowable limits.
5. At the Scrubgrass facility, we have possession of two survey instrument that meets the criteria in "Radiation Safety Program - Instruments in NUREG-1556, Vol. 4, 'Consolidated Guidance about Materials Licenses: Program-Specific Guidance about Fixed Gauges Licenses,' dated October 1998."
6. 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 include:

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NMSC/RGN MATERIALS-002

Commitment to performing monthly surveys with a survey instrument 30 cm from all shielded sources during non-routine operations, and commitment 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

If you have any questions about this change, please contact me at 814.385.6661 x15.

Sincerely,

A handwritten signature in cursive script, appearing to read "Jack Egley".

Jack Egley  
Acting General Manager

This is to acknowledge the receipt of your letter/application dated

6/27/2006, and to inform you that the initial processing which includes an administrative review has been performed.

AMBUS, 37-30089-01  
There were no administrative omissions. Your application was assigned to a technical reviewer. Please note that the technical review may identify additional omissions or require additional information.

Please provide to this office within 30 days of your receipt of this card

A copy of your action has been forwarded to our License Fee & Accounts Receivable Branch, who will contact you separately if there is a fee issue involved.

Your action has been assigned Mail Control Number 139066.  
When calling to inquire about this action, please refer to this control number.  
You may call us on (610) 337-5398, or 337-5260.