



ST MARYS CEMENT INC. (U.S.)

St Marys Cement Inc. (U.S.)
Charlevoix Plant
16000 Bells Bay Road
P.O. Box 367
Charlevoix, Michigan
49720 USA
231-547-9971

July 7, 2008

Mr. James R. Mullauer, M.H.S.
Health Physicist
United States Nuclear Regulatory Commission
2443 Warrenville Road
Lisle, IL 60532-4351

RE: St Marys Cement Inc.
16000 Bells Bay Road
Charlevoix, MI 49720

Dear Mr. Mullauer:

This letter and attachment should serve as our response to you regarding your request for further information on our application for renewal of our license # 21-32044-01.

Enclosed please find our completed NRC form 313. I hope this information will allow you to approve our request for renewal of our license. If not, please grant additional time in which to correct any insufficient information you may still require. Thank you very much.

Sincerely,

Sharon Regan-Brown
Radiation Safety Officer
St Marys Cement Inc
213-237-1341

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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 |
|-----|----|--------------|---|---|--|---|
| | | 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 <input type="checkbox"/> Specific description of the gauge use: _____ _____ _____ | [XX] Not applicable _____ [] Uses are: _____ (Submit safety analysis supporting safe use) |
| | | Krypton-85 | 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: _____ _____ _____ | [XX] Not applicable _____ [] Uses are: _____ (Submit safety analysis supporting safe use) |
| | | 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 <input type="checkbox"/> Specific description of the gauge use: _____ _____ _____ | [XX] Not applicable _____ [] Uses are: _____ (Submit safety analysis supporting safe use) |
| | | Cesium-137 | Sealed source manufacturer or distributor and model number: _____ Device manufacturer or distributor and | Not to exceed either the maximum activity per source or maximum activity per device as | Yes <input type="checkbox"/> Specific description of the gauge use: _____ _____ _____ | [XX] Not applicable _____ [] Uses are: _____ (Submit safety analysis supporting safe |

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| | | | model number: | specified in Sealed Source and Device Registration Certificate | | use) |
| | 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 [] Specific description of the gauge use: | [XX] Not applicable [] Uses are: (Submit safety analysis supporting safe use) | |
| | Other Isotope (Specify): CA-252 | Sealed source manufacturer or distributor and model number: Frontier Serial #3032NU Serial #3033NU Device manufacturer or distributor and model number: Thermo Fisher Serial #3032NU Serial #3033NU Sealed source manufacturer or distributor and model number: Frontier Device manufacturer or distributor and model number: CBX Serial #FTC-CF-Z1054 FTC-CF-Z1055 FTC-CF-Z2415 FTC-CF-Z2416 | Not to exceed either the maximum activity per source or maximum activity per device as specified in Sealed Source and Device Registration Certificate | Yes [xx] Specific description of the gauge use: | [] Not applicable [] 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: Sharon Regan-Brown</p> | <p>Before obtaining licensed materials, the proposed RSO will have successfully completed the training described in Criteria in the section "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 "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> | <p>[X]</p> | <p>[]</p> |
| <p>7. Individual(s) Responsible for Radiation Safety Program and Their Training and Experience</p> <p>7.2 Authorized Users</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 "Authorized Users" in NUREG-1556, Vol. 4, dated October 1998.</p> | <p>[XX]</p> | <p>[]</p> |
| <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 not 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> | <p>Need Not Be Submitted with Application</p> | |
| <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</p> | <p>[XX]</p> | <p>[]</p> |

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| | NUREG-1556, Vol. 4, dated October 1998. | | |
| 10. Radiation Safety Program - Audit Program | The applicant is not 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>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 October 1998, and <i>one</i> of the following:</p> <p>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>OR</p> <p>We will implement the model survey instrument calibration program in Appendix I to NUREG-1556, Vol. 4, dated October 1998.</p> | [XX] Contracted with Thermo to meet these requirements. | [] |
| 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. | [XX] | [] |
| 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 October 1998. | [XX] | [] |

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| 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 | |
| 10. Radiation Safety Program - Operating and 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 October 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 October 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 October 1998 provide your operating, emergency and lock-out (if applicable) procedures to NRC for review.</p> | [] | [] |
| 10. Radiation Safety Program - Leak Test | 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 | X [] | [] |

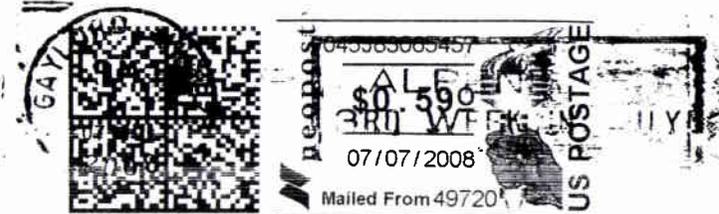
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| | <p>according to the kit supplier's instructions.</p> <p style="text-align: center;">OR</p> <p>We will implement the model leak test program published in Appendix M to NUREG-1556, Vol. 4, dated October 1998.</p> | [] | |
| 10. Radiation Safety Program - Maintenance | <p>ROUTINE MAINTENANCE</p> <p>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>NON-ROUTINE MAINTENANCE OPERATIONS</p> <p>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> | [X] | [] The information listed in Appendix N supporting a request to perform non-routing operations in-house is attached |
| 10. Radiation Safety Program - Transportation | The applicant is not 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 | This is not applicable to our program. We will not use fixed gauges at temporary job sites. | [X] Not Applicable | [] |
| | <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 October 1998.</p> | [] | |
| 10. Radiation Safety | The applicant is not required to | Need Not Be Submitted with | |

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| <p>Program - Minimization of Contamination</p> | <p>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.</p> | <p>Application</p> |
| <p>11. Waste Management - Gauge Disposal & Transfer</p> | <p>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.</p> | <p>Need Not Be Submitted with Application</p> |



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