

Performance Products Group

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Medicine and Environmental Health

Q7

July 17, 1991

United States Nuclear Regulatory Commission
ATTN: Paul D. Swetland, Chief
Nuclear Materials Safety Section C
Division of Radiation Safety and Safeguards
Region I
475 Allendale Road
King of Prussia, PA 19406

Gentlemen:

I have reviewed the renewal application for the Exxon Chemical Company Bayway Chemical Plant Materials License #29-03044-04 dated 2/5/91. I concur with the information contained within and believe it to be correct.

In response to your questions contained in a letter dated 5/10/91, the following additional information is offered:

- 1) I, or my designee, will sign all future license renewal applications.
- 2) Attachment 1 is a Training and Experience Summary for James R. Taday, as requested.
- 3) Leak testing of our sealed sources is performed every 6 months for our portable sealed sources and every 3 years for our fixed gauging devices. This is per the recommendations of the source manufacturer to whom we subscribe for our leak test program.
- 4) Attachment 2 is a copy of the procedures for locking out gauges during maintenance.

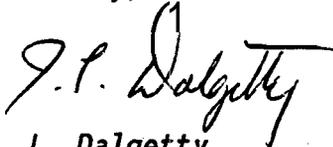
Incidentally the name of this site is "Bayway" Chemical Plant, not "Rathway" Chemical Plant as your correspondence indicated.

We hope this satisfies your questions regarding the renewal application for our license #29-03044-04 (docket #30-11084, control #114296).

114296

If you have any further questions, please don't hesitate to contact our Radiation Protection Officer at (908) 474-7685.

Sincerely,


J. L. Dalgetty

Attachments

JLD: sdc

cc: D. E. Agopsowicz

ATTACHMENT 1

**James R. Taday -- Staff Industrial Hygienist
Radiological Health Training & Experience**

Education:

B.A., Chemistry, **Adelphi University** 1971
Graduate Studies, **Chemistry, Adelphi University** 1973-76

Experience:

Environmental Chemist, Equitable Environmental Health 1971-80

Received extensive radiological health training for position **from Certified** Health Physicists on staff during initial year of employment. Training included radiation principles, health effects, **exposure/dose** calculations, dosimetry, calibration/ use of radiation measurement instruments, safety procedures and source handling.

Assumed primary responsibility for performing radiation surveys at nuclear electric generating **stations** to evaluate impact of plant radiation fields on community exposures. Assessed exposures attributable to stored radwaste, off-gas system emissions and N-16 emitted from turbine buildings. Surveys involved use of pressurized argon ionization chamber, portable **NaI** gamma ray energy spectrometer and **TLDs**. Provided training to plant Health Physicists on instrument calibration and use, and in survey **strategies/data** interpretation.

Served as Radiation Safety Officer for analytical laboratory radiation protection program (NY State). Responsibilities included wipe testing of sources, periodic radiation surveys and **state/federal** licences.

Staff Industrial Hygienist, Exxon Co., USA Jan. 1990-present

Responsible for supervision of radiation protection program including use of equipment with radioactive sources, exposure monitoring, wipe testing, training and radiation surveys. Additional responsibilities include review of industrial radiography contract work and procedures to ensure adequate worker protection.

Papers:

The Evaluation of Direct Radiation in the **Vicinity** of Nuclear Power Stations (with L.M. **Hairr**, P.C. **LeClare**, T.W. Philbin). Presented at the 18th. Annual Health **Physics** Society Meeting, Miami Beach, June 17-21, 1973.

ATTACHMENT 2

Three situations regarding fixed source gauges and maintenance **could** occur:

A) Maintenance performed on the fixed source gauge **itself**:

Gauge maintenance **would** only be performed' by **licensed/qualified personnel** provided by the manufacturer of the device. At the direction of these **individual(s)** the device **would** be **locked out** in accordance with **NRC** and **OSHA** requirements. **Measurements** would be made to verify lockout.

B) Maintenance performed near a fixed source gauge:

- (1) The gauge will be locked out in accordance to NRC and OSHA requirements as part of the **normal blanking/isolation** procedure.
- (2) Upon notification of the unit supervisor and the industrial **hygienist/RPO**, both verify **lockout** and take measurements.

C) Maintenance inside a **vessel** equipped with a fixed source gauge:

- (1) The gauge will be locked out in accordance to NRC and OSHA requirements as part of the **normal blanking/isolation** procedure.
- (2) Upon notification of the unit supervisor and the industrial **hygienist/RPO**, both verify **lockout** and take measurements.
- (3) Prior to entry of **any personnel** into the **vessel**, the **industrial hygienist/RPO** will enter the vessel to verify the integrity of the fixed source gauge shutter.