



Occidental Chemical Corporation OxyChem

A Subsidiary of Occidental Petroleum Corporation



January 28, 2010

Mr. Jose Macatangay
United States Nuclear Regulatory Commission
2443 Warrenville Road
Suite 210
Lisle, Illinois 60532

Fed Ex Number: 7932 2099 7620

Control # 318583

SUBJECT: REQUEST TO MODIFY LICENSE #21-1771-01 TO ALLOW NON-ROUTINE MAINTENANCE

Dear Mr. Macatangay:

This letter is a follow up to our phone conversation on 01/11/2010 and my previous written correspondences to your office dated 01/06/10, 12/16/09 and 10/15/09.

Per our phone conversation you requested additional information on two items.

- 1) A list of trained individuals who may be performing non-routine type maintenance on gauges containing a locked out sealed sources. Please see Attachment A for this list.
- 2) Documentation from the gauge manufacturer that our internal training for non-routine maintenance activities is equivalent to what the manufacture would provide to us. Please see Attachment B for a letter from the Ohmart training manager. (In response to the question in that letter, yes we also do annual refresher training.)

Please let me know if you have any further questions or need any additional information.

Sincerely,

Jim Glover
Radiation Safety Officer
Occidental Chemical Corporation
1600 South Madison Street
Ludington, Mi 49431
231-845-4474

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Attachment A

Individuals who could be asked to perform not routine maintenance activities on sealed source gauges under the supervision of the sites Radiation Safety Officer. Non Routine Maintenance by our crafts personnel could include: Installation, alignment, relocation or removal from service the devices containing sealed sources. These activities would only take place after the source shutter has been closed and locked out and the gauge has been surveyed and verified to exhibit < 5.0 MR/hr at a distance of one foot.

Jim Glover
Jim Anderson
Lisa Rokosky
Todd Miller
Dan Green
Bonnie Irwin
Bud Johnson
Pat Kissel
Mike Kusebuski
Greg Lovett
Sue Upthegrove
Don Whitenight
Don Albrecht
Scott Alexander
Steve Johnson
Mike Tenny
Norm Nielsen
Dalel Paul
Tony Zack
Gonzalo Ramirez
Mark Belke
Steve Hillard
Greg Kozlowski
Doug Soper
Ted Koikas
Wes Maddix
Steve McVicker
Larry Gaylord
Kevin Willick
Jeff Bromley

Attachment B



4170 Rosslyn Drive
Cincinnati, OH 45209 USA
[toll] 800.FOR.LEVEL
[tel] 513.272.0131
[fax] 513.272.0133
www.ohmartvega.com

January 25, 2010

James Glover
Occidental Chemical Corporation 1600 S Madison Street
Ludington, MI 49431

Re: Authorized User Training

Jim,

At your request I have reviewed the documentation you use for training your authorized users. This documentation included:

- Radiation Awareness PowerPoint
- Sealed source refresher training PowerPoint module
- Training checklist for non-routine maintenance
- Radiation fundamentals manual
- Radiation tag out form
- Sealed sources IPT, which is a quiz to verify mastery of the material
- Temporary Removal and Reinstallation of a Nuclear Sealed Source Gauge Procedure

Together all of these documents and training tools cover the same basic information that we use for training our field service engineers. Because we are a manufacturer, we spend a great deal of time (six months or longer) covering these topics and every source holder that we manufacture. The length of training to cover only the installations and procedures specific to just the source holders that are in your plant would naturally be shorter.

We require annual refresher training for our people with a test to ensure mastery; I assume you also have a defined refresher requirement.

Please let me know if I can be of any further assistance.

Sincerely,

A handwritten signature in blue ink that reads "Candy Brock".

Candy Brock
Training Manager

From: Origin ID: MKGA (231) 845-4474
Jim Glover
OxyChem - Calcium Chloride
1600 S. Madison Ave.

Ludington, MI 49431



Ship Date: 28JAN10
ActWgt: 1.0 LB
CAD: 101196653/INET3010

Delivery Address Bar Code



Ref # 362502-70007300
Invoice #
PO #
Dept #

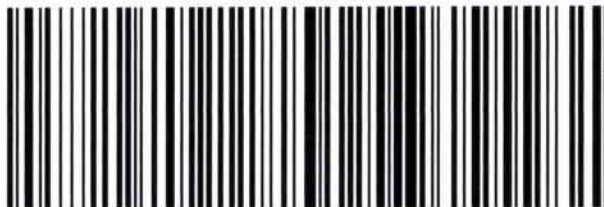
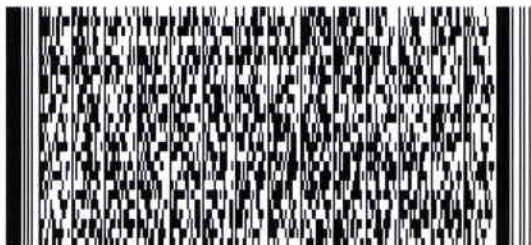
SHIP TO: (630) 829-9830 BILL SENDER
Materials Licensing Branch
U.S. Nuclear Regulatory Commission
2443 WARRENVILLE RD STE 210
ATTN: JOSE MACATANGAY
LISLE, IL 60532

TUE - 02 FEB A1
EXPRESS SAVER

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