



**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

**RECEIVED FEB 0 1 2010**

## 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](http://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



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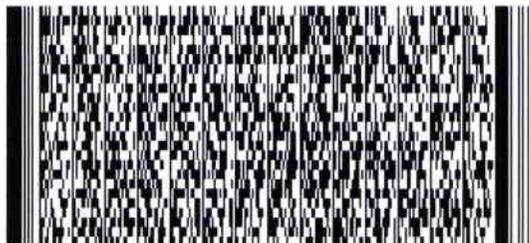


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**U.S. Nuclear Regulatory Commission**  
**2443 WARRENVILLE RD STE 210**  
**ATTN: JOSE MACATANGAY**  
**LISLE, IL 60532**

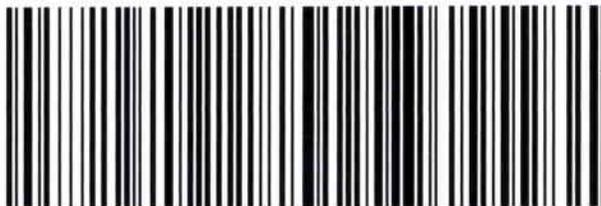
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