

TRANSMISSION VERIFICATION REPORT

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UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION III
2443 Warrenville Road, Suite 210
Lisle, Illinois 60532-4352

TELEFAX TRANSMITTAL

DATE: 12/31/2009

NUMBER OF PAGES: 3
(including this page)

SEND TO: Jim Glover, RSO

LOCATION: Occidental Chemical Corporation

FAX NUMBER: 231 - 845 - 4246 **VERIFY BY CALLING SENDER**

FROM: Jose Macatangay *JM*
(SENDER)

TELEPHONE NUMBER: 630 - 829 - 9892 FAX NUMBER: 630 - 515 - 1078

If you do not receive the complete fax transmittal, please contact the sender as soon as possible at the telephone number provided above.

MESSAGE



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MESSAGE

NOTICE

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JOSE D. MACATANGAY
MATERIALS LICENSING BRANCH
UNITED STATES NUCLEAR REGULATORY COMMISSION
REGION III
2443 WARRENVILLE ROAD STE 210
LISLE, ILLINOIS 60532-4352
OFFICE: (630)-829-9841 FAX: (630) 515-1078

CONVERSATION RECORD

|TIME

|DATE

ACTUALLY FAXED?

Yes.

12/31/2009

NAME OF PERSON(S) CONTACTED

Jim Glover, RSO

ORGANIZATION

Occidental Chemical Corporation

TELEPHONE NO.

O: 231-845-4474

F: 231-845-4246

SUBJECT

License No.: 21-17772-01

Control No.: 318583

SUMMARY

We have reviewed your amendment request dated October 15, 2009, and additional information dated December 16, 2009, and find that we need additional information as follows:

Document dated December 16, 2009:

1. From Item 1, it seems that your non-routine maintenance operations will involve only the sealed source. Please clarify your non-routine maintenance operations, i.e. installation, relocation, alignment, and removal from service of fixed gauges and/or sealed source.
2. From Items 2 and 3, please submit the names of the individuals who will be performing non-routine maintenance operations and provide proof of training that these individuals have had the fixed gauge manufacturer's non-routine maintenance operations classroom and hands-on training or document indicating that equivalent training has been achieved, i.e. provide document from manufacturer that the internal training for non-routine maintenance operations you provided your personnel is equivalent to that provided by the manufacturer.
3. From Item 5, it does not seem adequate from your submittal that when performing the requested non-routine maintenance operations, those individuals will not have the potential to receive 10% of the allowable limits. Please commit to wearing both whole body and extremity monitoring devices for those individuals performing non-routine maintenance operations.
4. From Item 7, please identify the areas to be surveyed prior to, during, and post non-routine maintenance operations.
5. From your attachments, there are instances where you refer to individuals being able to perform non-routine tasks, i.e. source removal and source repositioning, under the supervision or presence of the RSO or person trained by RSO. Please confirm that only those individuals who are authorized and listed on your license to perform tasks associated with non-routine maintenance operations will be the only personnel performing such tasks.
6. From your submitted information, there was no commitment to follow the manufacturer's instructions and recommendations for non-routine maintenance operations. Please confirm that you will be committed to following the manufacturer's instructions and recommendations for non-routine maintenance operations.

7. From your submitted information, there was no commitment that doses to members of the public will be within regulatory limits and ALARA, i.e. use of shielding. Please commit to maintaining doses to members of the public within regulatory limits and ALARA.
8. From your submitted information, there was no commitment to ensure that the source is secured against unauthorized removal/access or is under constant surveillance. Please commit to maintaining source security against unauthorized removal/access that it constant surveillance will be maintained.
9. From your submitted information, there was no commitment to post appropriate labels and signs in the work area. Please commit to posting appropriate labels and signs in the work area during the non-routine maintenance operations.
10. From your submitted information, there was no mention of the use of replacement parts or other materials, i.e. lubricants, in the performance of non-routine maintenance operations. Please confirm that you will be committed to ensure that any non-manufacturer/non-distributor supplied replacement components or parts, or the use of materials (i.e. 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.
11. From your submittal, your procedures for "Reinstalling the Source" do not appear to be adequate. Please confirm that you will be committed to the manufacturer's instructions and recommendations that prior to being returned to routine use, the gauge functions and source integrity are verified.

We will be unable to continue processing your request until we receive this information. In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice," a copy of this letter will be available electronically in the NRC Public Document Room or from the Publicly Available Records (PARS) component of NRC's document system (ADAMS). The NRC's document system is accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html>.

ACTION REQUIRED

Please submit a **signed written response** by January 8, 2010. Be sure to reference control number 318583 to facilitate correct processing of your response.

If we do not receive a written response by January 8, 2010, please note that we **will void** this request in order to enable you to prepare a quality response without time constraints. This would be done without prejudice to the resubmission of your request at a later date. Upon receipt of your response we will resume our review. Address your written response to my attention at the above address.

Upon receipt of your response we will resume our review.

PLEASE DIRECT ANY QUESTIONS YOU MAY HAVE TO ME AT (630) 829-9892.

NAME OF PERSON DOCUMENTING CONVERSATION	SIGNATURE	DATE
Jose Macatangay	<i>Jose Macatangay</i>	December 31, 2009

C. Casey 1/17/2010