



Occidental Chemical Corporation *OxyChem*

A Subsidiary of Occidental Petroleum Corporation



1600 South Madison Street, Ludington, Michigan 49431
Phone 231.845.4411

April 15, 2010

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

Fed Ex Number: 7934 5083 4193

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 conversations on 3/26/10 and 4/14/10.

Per these phone conversations you requested additional information verifying that I have had hands on training on the removal and installation of source holders. As requested I have attached a statement from the assistant RSO of Dow Chemical Midland, Michigan explaining this training. *Attachment A*. The gauges I was trained on were Ohmart design similar to the ones we have on the Ludington site. Additionally, I did verify that the Dow Midland license 21-00265-06 does include Ohmart style gauges with a CS-137 source (see 6B and 9B of their license). Finally, I did verify with Mr. Jim Weldy the Midland RSO, that Jerry Cassidy (trainer) is approved by the Midland Radiation Committee to perform non-routine maintenance as referenced in their license.

In addition you asked for a statement from me confirming training I had from the previously retired Ludington RSO. *See Below*:

On 1/20/2009 I was trained in the field by Mr. Abe Williams (the previous Ludington site Radiation Safety Officer) on our sealed source gauges. This training included how to properly lock out the sources, do radiation surveys, perform shutter and wipe test, proper signage and also included discussions on the proper safe installation and removal of sealed source holders and the potential hazards.

I have also included a copy of the training certificate I received from Ohmart-Vega for recent training which included the elements of non-routine maintenance. *Attachment B*.

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Mr. Jose Macatangay

Finally, you requested a statement clarifying who I am requesting to be authorized to perform or physically supervise the installation, alignment, relocation or removal from service a source holder containing a sealed source. This would normally be myself, however in my absence it would be an assistant trained by me. Currently this would be Tim Martin, Lisa Rokosky or Todd Miller.

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

Sincerely,

A handwritten signature in blue ink, appearing to read "Jim Glover", with a long horizontal flourish extending to the right.

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

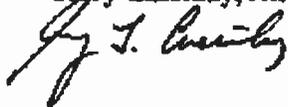
Mr. Jose Macatangay

Attachment A

**Nuclear Gauge Installation/Removal and
Lockout/Tagout Training**

On October 7, 2009 James Glover participated in hands on training in the field for safe installation and removal of a sealed source/nuclear gauge. Included in this training were wipe testing, radiation surveying and lockout/tagout.

Jerry Cassidy, Alternate RSO, Dow Chemical

Handwritten signature of Jerry T. Cassidy in cursive script.



Jim Glover

Occidental Chemical Ludington, MI

has successfully completed the

Radiation Safety Officer Review

presented

March 16, 2010 - March 17, 2010

at

OhmartVEGA

Subject matter covered based on NUREG 1556

- Basic atomic theory
- Measurement and monitoring techniques
- Biological effects of radiation
- Radiation Safety Program
- Procedures for
 - Installation
 - Relocation
 - Removal from service
- Proper disposal practices
- Emergency procedures



Kyle Harness

Radiation Safety Officer



Candy Brock

Training Manager

From: Origin ID: MKGA (231) 845-4474
 Jim Glover
 OxyChem
 1600 South Madison
 Ludington, MI 49431



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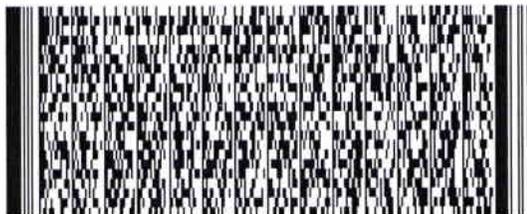
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Jose Macatangay
US Nuclear Regulatory Commission
2443 WARRENVILLE RD STE 210

Ref # 362502
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