CITY OF DETROIT
WATER AND SEWERAGE DEPARTMENT
FIELD SERVICES

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DETROIT, MICHIGAN 48207
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November 22, 2010

Mr. Michael Herr
U.S. Nuclear Regulatory Commission
Region III
Materials Licensing Section
2443 Warrenville Road, ste. 210
Lisle, Illinois 60532-4352

Dear Mr. Herr

Regarding: Request to Amendment NRC License No. 21-23397-02
Docket No. 030-36647

The Detroit Water and Sewerage Department (DWSD) requests an amendment to the above license. This amendment shall consist of appointing Ms. Renee Culver as the new Radiation Safety Officer (RSO) in place of Mr. Raymond Hurd who retired in August 2010. Ms. Culver had completed an equivalent gauge manufacturers training course on Radiation Safety and Use of Portable Nuclear Gauges, with training per 49 CFR 172, sub H, & Security awareness transit held in November 13, 2002, in the City of Amanda, State of Ohio, by Cline's Technical Services, Inc, copy attached for reference. Also, Ms. Culver obtained a refresher course and a certificate in 49 CFR 172, sub H, & Security awareness transit held in November 22, 2010, copy attached for reference. Please expedite the process of this amendment.

If questions arise regarding the information provided, please contact me at (313) 833-8443.

Very truly yours,

K. Ramachandran, P.E.
Head Engineer-Field Engineering

KR: cfm

Attachments

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• *No: 9826944*
Duplicate

Certificate of Completion

This is to certify that Renee Culver has completed an equivalent gauge manufactures training course on Radiation Safety and use of Portable Nuclear Gauges, with training per 49 CFR 172, sub H, & Security awareness during transit, held 13 th day of November, 2002, in the city of Amanda, State of Ohio, by

Cline's Technical Services, Inc.

10883 Cincinnati Zanesville Road - Amanda, Ohio- 43102
Phone: 740-969-2720 *Fax: 740-969-2122*

Willie Cline
Radiation Safety Officer ***Willie Cline***

Willie Cline
Instructor ***Willie Cline***

See back side for course content.

Vmc 05.04.2009

Contents of Course

Principles and Practices of Radiation Protection

Theory, terminology, and practical explanations of Radioactive Materials, License requirements, Storage, Transportation [to include Initial Training required by 49 CFR 172,Sub.H,& Security Awareness] and Emergency Procedures to be used with portable nuclear devices typical of "soil, agriculture, roof, asphalt and other construction gauges" using small (not more than 300 millicurie) sources in sealed capsules.

Radioactive Measurement Standardization and Monitoring Techniques and Instruments

Demonstration of radiation levels typical with use of small, portable devices using conventional survey meter. Concentration on Inverse Squares Law factors effects of shielding, time, and distance in use of materials.

Mathematics and Calculations basic to use and measurement of Radioactivity

Determination of typical radiation levels in mrems within working distance of a typical portable " construction device", calculation of portable weekly radiation dose under a heavy work condition, and relation of that dose to the NRC maximum annual allowances for occupational use of radioactivity.

Establishment of relationship of this occupational dose to that obtained from normal life exposures of external radiation at sea level and high elevations, jet plain travel, normal health XRAYS, etc.

Biological effects of Radiation

General discussion of effects of low level radiation on the body with emphasis on the relationship of routine lifestyle exposure (environmental, routine medical, smoking, etc.) to the added exposure from normal use of portable devices using small millicurie sources.

7409692122

Cline's Technical Services, Inc.

Certificate of Attendance

This is to certify that the below listed individuals have attended a refresher training session.
Topics covered; Operating & emergency procedures, transportation regulations, to include
Haz - Mat training and testing per 49 CFR - 172, sub H, & security awareness.
Materials used are part of CTS, Inc. Gauge Operators Training Course & ***Nuclear Gauge Transportation Guide.***

Renee Culver

The above training was held via telephone by Cline's Technical Services, Inc.

Date: November 22nd, 2010

Instructor: Willie Cline

Ph 740-969-2720 fax: 740-969-2122

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To Whom It May Concern

Regarding: Responsibilities of the Radiation Safety Officer (RSO)
NRC License No. 21-23397-02
Docket No. 030-36647

I have reviewed, understand and accept the responsibilities of the Radiation Safety Officer (RSO) and as stipulated in Appendix E of NUREG-1556, Vol.1, Rev. 1, copy attached for reference.

Renee Culver

Renee Culver, Sr. Inspector
Field Engineering

KR: cfm

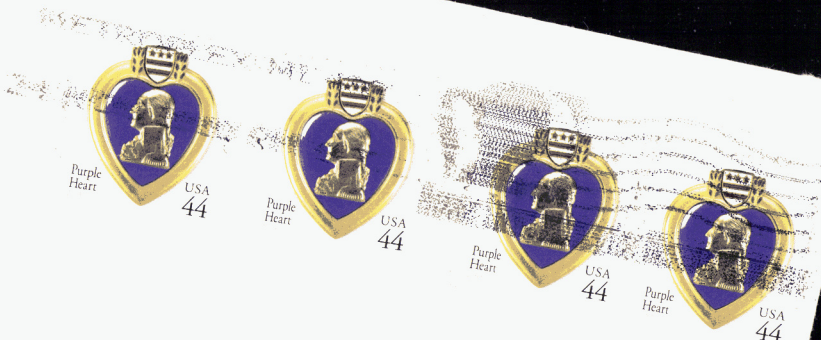
Appendix E

Typical Duties and Responsibilities of the Radiation Safety Officer

The RSO's duties and responsibilities are illustrated in Figure 8.1 and typically include ensuring the following:

- Licensed activities that the RSO considers unsafe are stopped;
- Possession, use, storage, and maintenance of sources and gauges are consistent with the limitations in the license, the Sealed Source and Device Registration sheet(s), and the manufacturer's recommendations and instructions;
- Individuals who use gauges are properly trained;
- When necessary, personnel monitoring devices are used and exchanged at the proper intervals; records of the results of such monitoring are maintained;
- Gauges are properly secured;
- Proper authorities are notified in case of accident, damage to gauges, fire, or theft;
- Unusual occurrences involving the gauge (e.g., accident, damage) are investigated, cause(s) and appropriate corrective action are identified, and corrective action is taken;
- Audits are performed at least annually and documented, and corrective actions are taken;
- Licensed material is transported in accordance with all applicable DOT requirements;
- Licensed material is disposed of properly;
- Appropriate records are maintained;
- An up-to-date license is maintained and amendment and renewal requests are submitted in a timely manner;
- Up-to-date operating and emergency procedures are developed, maintained, distributed, and implemented;
- Non-routine operations are performed by the manufacturer, distributor, or person specifically authorized by NRC or an Agreement State;
- Documentation is maintained to demonstrate, by measurement or calculation, that the TEDE to the individual member of the public likely to receive the highest dose from the licensed operation does not exceed the annual limit in 10 CFR 20.1301;
- When the licensee identifies violations of regulations or license conditions or program weaknesses, corrective actions are developed, implemented, and documented;
- Posting of documents required by 10 CFR 19.11 (Parts 19 and 20, license documents, operating procedures, NRC Form 3, "Notice to Employees"), and 10 CFR 21.6 (Part 21, Section 206 of Energy Reorganization Act of 1974, procedures adopted pursuant to Part 21) or posting a notice indicating where these documents can be examined.

Detroit water and Sewerage Department
Field Services Building
3501 Chene St
Detroit, Michigan 48207



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