RECEIVED
JAN 25 2011
DNMS

TransCanada
In business to deliver

January 25, 2011

TransCanada PipeLines Limited

Attention: Ms. Jacqueline D. Cook
Senior Health Physicist
Nuclear Materials Licensing Branch
U.S. Nuclear Regulatory Commission
611 Ryan Plaza Drive, Suite 400
Arlington, TX 76011

RE: Question Regarding Condition 15 of Materials License 21-29258-01

Good Afternoon, Ms. Cook

TransCanada maintains Materials License 21-29258-01for two offshore Cesium gauges affixed to pipelines ~70 miles offshore (Gulf of Mexico), in ~75 feet of water, buried beneath 4+ feet of sand.

The purpose of this communication is to clarify the intent of license condition 15 regarding the performance of a physical inventory every three years or at other intervals to account for these sealed sources. The location of these gauges would effectively preclude a physical inventory, and could potentially cause impact other License conditions which effectively states the gauges will not be disturbed or handled.

Because TransCanada wishes to remain compliant with license terms, I request a clarification to Condition 15, or suggest the following be considered:

1. An option to perform an inventory by documented verbal or written contact with pipeline personnel who have responsibility for the pipelines and gauges, confirming that both sources remain in their respective underwater location.

   Please note that this option was part of ANR's legacy Materials License 21-24502-01 [see condition 19] when ANR was owned by The Coastal Corporation (1985 to 2001) and was successfully implemented into that program. An excerpt of this license indicating condition 19 is shown on page two of this document.

2. A form such as "Inventory of Nuclear Pig Signals at Eugene Island 188" is used to document the inventory. An example of a recently executed form can be viewed in page three of this letter.

To conclude, the objective of this letter is to clarify the intent of license Condition 15 and to suggest an alternative means of compliance.

Please contact me if additional information is necessary.

Regards,

Salvatore D. Delisi

Salvatore J. Delisi
Radiation Safety Officer
TransCanada
5250 Corporate Drive
Troy, Michigan 48098
Office: 248-205-4595
FAX: 248-205-4695
Cellular: 313-268-7203
Email: salvatore_delisi@transcanada.com

574331

Question Regarding Condition 15 of TransCanada Materials License 21-29258-01
Salvatore J. Delisi, Radiation Safety Officer

Page 2.
Condition 19 from ANR legacy license

NRC Form 374A (5-84) U.S. NUCLEAR REGULATORY COMMISSION

PAGE 3 OF 3 PAGES

MATERIALS LICENSE
SUPPLEMENTARY SHEET

License number: 21-24502-01

Docket or Reference number: 03028671/030-08824

CORRECTED COPY

Amendment No. 03

19. For material specified in Item 7.B., the licensee shall conduct an inventory to account for both sources and/or devices. Records of inventories shall be maintained for 2 years from the date of each inventory. The inventory shall consist of documented verbal or written contact with pipeline personnel, who have responsibility for the pipelines and gauges, confirming that both sources remain in their respective underwater storage location.

20. The licensee shall maintain records of information important to safe and effective decommissioning at 20095 Gilbert Road, Big Rapids, Michigan per the provisions of 10 CFR 30.35(g) until this license is terminated by the Commission.

21. Except as specifically provided otherwise in this license, the licensee shall conduct its program in accordance with the statements, representations, and procedures contained in the documents including any enclosures, listed below. The Nuclear Regulatory Commission's regulations shall govern unless the statements, representations and procedures in the licensee's application and correspondence are more restrictive than the regulations.

A. Application dated July 20, 1990; and

B. Letter dated January 10, 1991.

For the U.S. Nuclear Regulatory Commission

RECEIVED APR 10 1992

Date: 4/7/92

By Deborah A. Sekura
Materials Licensing Section, Region III

Copy RECEIVED APR 10 1992

Question Regarding Condition 15 of TransCanada Materials License 21-29258-01
Salvatore J. Delisi, Radiation Safety Officer
January 25, 2011

Inventory of Nuclear Pig Signals at Eugene Island 188

Since the last report dated 4/7/09, there

☐ has ☒ has not

been any construction work or activity in the vicinity (100 yards) of either of the two nuclear pig signals located upstream of Eugene Island 188 which could be expected to cause a change in their disposition from their original installed condition.

By Edmond Guillotte (typed or printed) Edmond Guillotte Signature 12/1/10 Date

Note: Please read carefully before checking the appropriate box to indicate if there has been activity which could have caused a change in the disposition of the nuclear pig signals. If there has been activity, please provide a detailed explanation as to the nature and extent of the activity performed and the identity of those involved so that the information may be transmitted to the NRC.

It is important to remember that these devices shall not be serviced, repaired or removed from their respective underwater storage locations without prior written approval from the NRC. If we have reason to believe that these devices have been disturbed, even inadvertently, this information must be reported immediately to the following individuals:

Radiation Safety Officer:

Salvatore J. Delisi
ANR Pipeline Company/TransCanada
5250 Corporate Drive
Troy, Michigan 48098
Work: (248) 205-4595
FAX: (248) 205-4695
Cellular: (313) 268-7203
Home: (586) 775-2502

Note: Please FAX this completed form to Salvatore Delisi at (248) 205-4695 and send the original to the Troy address listed above.

2-11-2011
DATE

This is to acknowledge the receipt of your letter/application dated 1-25-2011, and to inform you that the initial processing, which includes an administrative review, has been performed.

☒ There were no administrative omissions. Your application will be assigned to a technical reviewer. Please note that the technical review may identify other omissions or require additional information.

☐ Please provide to this office within 30 days of your receipt of this card:

The action you requested is normally processed within 90 days.

☐ A copy of your action has been forwarded to our License Fee & Accounts Receivable Branch, who will contact you separately if there is a fee issue involved.

Your action has been assigned **Mail Control Number** 574331.
When calling to inquire about this action, please refer to this mail control number.
You may call me at 817-860-8103.

Sincerely,

Colleen Monahan

Licensing Assistant

NRC FORM 532 (RIV)
(10-2008)

BETWEEN:

Accounts Receivable/Payable
and
Regional Licensing Branches

[FOR ARPB USE]
INFORMATION FROM LTS

Program Code: 03810
Status Code: Pending Amendment
Fee Category: 3P
Exp. Date:
Fee Comments:
Decom Fin Assur Reqd: N

License Fee Worksheet - License Fee Transmittal

A. REGION

1. APPLICATION ATTACHED

Applicant/Licensee:	TRANSCANADA
Received Date:	01/25/2011
Docket Number:	3037442
Mail Control Number:	574331
License Number:	21-29258-01
Action Type:	Amendment

2. FEE ATTACHED

Amount: _____

Check No.: _____

3. COMMENTS

Signed: Colleen Murnahan

Date: 1-31-2011

B. LICENSE FEE MANAGEMENT BRANCH (Check when milestone 03 is entered / /)

1. Fee Category and Amount: _____

2. Correct Fee Paid. Application may be processed for:

Amendment: _____

Renewal: _____

License: _____

3. OTHER _____

_____

Signed: _____

Date: _____