



UNITED STATES
NUCLEAR REGULATORY COMMISSION

REGION IV
612 EAST LAMAR BLVD, SUITE 400
ARLINGTON, TEXAS 76011-4125

August 12, 2011

Municipality of Anchorage
Public Works Department
ATTN: Michael E. Krueger
Radiation Safety Officer
4700 Elmore Road
Anchorage, Alaska 99507

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION

Dear Mr. Krueger:

The U.S. Nuclear Regulatory Commission (NRC) has completed the technical review of the Municipality of Anchorage's renewal application for NRC License Number 50-25852-02 and additional information is needed to complete the renewal process. Please provide the following information within 20 days of receipt of this letter. Make reference to mail control number 575170 when providing your response.

1. Indicate if you are in a managerial position with the State of Alaska that allows you to make legally binding commitments on behalf the State of Alaska. This is to confirm that you can sign NRC Form 313 as a certifying officer. If you don't have such authorization then resubmit NRC Form 313 signed by an individual who can make legally binding commitments on behalf the State of Alaska. The NRC Form 313 can be found at: <http://www.nrc.gov/reading-rm/doc-collections/forms/>.
2. Provide your contact information (telephone number, facsimile number, and email address). This information will be used to update our licensing tracking system.
3. According to the renewal application, your current portable gauge inventory consists of:

Two Troxler Model 3440	(18 millicuries of Cs-137 and 88 millicuries of Am-241),
One Troxler 3411-B	(9 millicuries of Cs-137 and 44 millicuries of Am-241),
One Troxler 4640-B	(9 millicuries of Cs-137), and
Two Troxler 3241-C	(240 millicuries of Am-241).

The total amount of your current inventory is 36 millicuries of Cs-137 and 372 millicuries of Am-241. The renewal application requests authorization for a total of 500 millicuries of Cs-137 and 800 millicuries of Am-241. Submit the number of gauges and type of model numbers that you want authorized in License No. 50-15852-02. You can request authorization for additional gauges based on future business needs.

4. The enclosed Appendix D of NUREG-1556, Volume 1, revision 1, provides criteria for training courses for portable gauge users that have been deemed adequate by the NRC. Provide the information described in Appendix D for the State of Alaska, Department of Transportation & Public Facilities (DOT&PF) training course for nuclear soil and asphalt gauge operation. If the DOT&PF course content, course examination, and course instructor qualifications meet the minimum criteria of Appendix D, an authorization will be added to the license for the Municipality of Anchorage to conduct in-house training in accordance with the DOT&PF training course.

5. There are contradicting statements in the renewal application regarding operating and emergency procedures. Page 2 of the application states that the licensee will implement and maintain operating and emergency procedures delineated in Appendix H of NUREG-1556, Volume 1, revision 1, and Page 1 states that the licensee will implement and maintain operating, emergency and security procedures in the errata to Appendix H of NUREG-1556, Volume 1, revision 1. Commit to the following language which reflects the most current licensing guidance.

"We will implement and maintain the "Operating, Emergency, and Security Procedures" described in the errata sheet to Appendix H of NUREG-1556, Volume 1, Revision 1, and will provide copies of these procedures to all gauge users and at each job site."

6. Commit to the following language: "Either we will maintain, for inspection by NRC, documentation demonstrating that unmonitored individuals are not likely to receive a radiation dose in excess of 10 percent of the allowable limits in 10 CFR Part 20 or we will provide dosimetry processed and evaluated by an NVLAP-approved processor that is exchanged at a frequency recommended by the processor."

7. Commit to the following language: "Leak tests will be performed at intervals approved by NRC or an Agreement State and specified in the Sealed Source and Device Registration Sheet. Leak tests will be performed by an organization authorized by NRC or an Agreement State to provide leak testing services for other licensees or using a leak test kit supplied by an organization authorized by NRC or an Agreement State to provide leak test kits to other licensees and according to the kit supplier's instructions."

8. Commit to the following language: "Routine Cleaning and Lubrication - We will implement and maintain procedures for routine maintenance of our gauges according to each manufacturer's recommendations and instructions."

9. Commit to the following language: "Non-Routine Maintenance - We will send the gauge to the manufacturer or other person authorized by NRC or an Agreement State to perform non-routine maintenance or repair operations that require the removal of the source or source rod from the gauge."

10. Please note that the U.S. Department of Transportation UN2974 identification number for portable gauge Type A shipping containers is no longer a valid number. Confirm that your Type A shipping containers and bill of lading information have the correct identification number UN3332.

In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice," a copy of this letter will be available electronically for public inspection in the NRC Public Document Room or from the NRC's document system (ADAMS). ADAMS is accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html>.

Thank you for your cooperation.

Sincerely,

A handwritten signature in black ink, appearing to read "Roberto J. Torres". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Roberto J. Torres, Senior Health Physicist
Nuclear Materials Safety Branch B

Docket: 030-20410
License: 50-15852-02
Control: 575170

Appendix D

Criteria for Acceptable Training Courses for Portable Gauge Users

COURSE CONTENT

- 1.5 to 2 hours of radiation safety and regulatory requirements, emphasizing practical subjects important to safe use of the gauge; radiation vs. contamination; internal vs. external exposure; concept of time, distance, and shielding to minimize exposure; control and surveillance of gauges; location of sealed source within the portable gauge; inventory; recordkeeping; incidents; licensing and inspection by regulatory agency; need for complete and accurate information; employee protection; deliberate misconduct.
- 1.5 to 2 hours of practical explanation of portable gauge theory and operation; operating, emergency, maintenance, and transportation procedures; and field training emphasizing radiation safety and including test runs of setting up and making measurements with the gauge, controlling and maintaining surveillance over the portable gauge, performing routine cleaning and lubrication, packaging and transporting the gauge, storing the gauge, and following emergency procedures.

COURSE EXAMINATION

- At least a **80**-percent score on a 25-to-50-question, closed-book written test
 - Emphasis on radiation safety of portable gauge storage, use, sealed source location, maintenance, and transportation, rather than the theory and art of making portable gauge measurements;
 - Review of correct answers to missed questions with prospective gauge user immediately following the scoring of the test.

COURSE INSTRUCTOR QUALIFICATIONS

Instructor should have either:

- Bachelor's degree in a physical or life science or engineering;
- Successful completion of a portable gauge user course;
- Successful completion of an 8-hour radiation safety course; and
- 8 hours hands-on experience with portable gauges.

OR

- Successful completion of portable gauge user course;
- Successful completion of 40-hour radiation safety course; and
- 30 hours of hands-on experience with portable gauges.

Note: Licensees should maintain records of training.