Michael G. Herr, CHP **MATERIALS LICENSING BRANCH** UNITED STATES NUCLEAR REGULATORY COMMISSION

REGION III 2443 WARRENVILLE ROAD SUITE 210 LISLE, ILLINOIS 60532-4352 OFFICE: (630)-829-9752 FAX: (630) 515-1078

CONVERSATION RECORD

DATE

Emailed on November 7, 2011

2:20 p.m. CST.

November 7, 2011

NAME OF PERSON(S) CONTACTED

ORGANIZATION

TELEPHONE NO

Daryl Moore

Xerium Technologies, Inc.

O: (540) 869-6111

Environmental Manager/

Radiation Safety Officer

License No.: 45-31371-01

Control No.: 575199

SUMMARY

This refers to your application dated May 17, 2011 and the conversation between Daryl Moore and Michael Herr on November 7, 2011.

NUREG 1556, Vol. 1, Rev.1, "Consolidated Guidance About Materials Licenses: Program-Specific Guidance About Portable Gauge Licenses," requires that specific elements of the Radiation Safety Program be addressed during the renewal process and commitments be made by the licensee. This NUREG can be found on our website at:

http://www.nrc.gov/reading-rm/doc-collections/nuregs/staff/sr1556/v1/r1/

Appendix B of the NUREG referenced above provides a checklist with suggested responses for the licensee to address these required radiation program commitments. Item 10 of your application dated May 17, 2011 stated that your "Radiation Safety programs follows rule and regulations of the NRC and Radiation Safety Programs of the States." This statement does not provide enough information to specifically address the commitments required in Appendix B. Please see the requested information needed below.

In Appendix B the section titled; "Radiation Safety Program – Survey Instruments" provides a suggested response for the licensee of: "We will either possess and use, or have access to and use, a radiation survey meter that meets the Criteria in the section entitled "Radiation Safety Program – Instruments" in NUREG-1556, Vol. 1, Rev. 1, dated November 2001." Please provide a response to how you will provide survey instrumentation for your Radiation Survey Program.

In Appendix B the section titled; "Radiation Safety Program – Material Receipt and Accountability" provides a suggested response for the licensee of: "Physical inventories will be conducted at intervals not to exceed 6 months, to account for all sealed sources and devices received and possessed under the license." Please provide a response to how you will conduct inventories to account for devices you possess under your NRC material license.

In Appendix B the section titled; "Radiation Safety Program – Occupational Dosimetry" provides a suggested response of: "We will maintain, for inspection by NRC, documentation demonstrating that unmonitored individuals are not likely to received, in one year, 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." Please provide a response that commits to one of these recommended responses or provide an equivalent response.

In Appendix B the section titled; "Radiation Safety Program – Operating and Emergency Procedures" request that the licensee to respond by stating that you will either: "implement and maintain the operating and emergency procedures in Appendix H of NUREG-1556, Vol. I, Rev. I, dated November 2001, and provide copies of these procedures to all gauge users and at each job site." OR "operating and emergency procedures will be developed, implemented, and maintained and will meet the criteria in the section entitled "Radiation Safety Program - Operating and Emergency Procedures" in NUREG-1556, Vol. I, Rev. I, dated November 2001." Please provide a response that commits to one of these recommended responses or provide an equivalent response.

In Appendix B the section titled; "Radiation Safety Program – Leak Test" request that the licensee to respond by stating that: "Leak tests will be performed at intervals approved by NRC or an Agreement Sate 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 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 sample according to the kit supplier's instructions. "OR you will provide the information requested in Appendix J of NUREG 1556 Vol. 1 Rev. 1 to support leak testing and analysis. Please provide a response that commits to one of these recommended responses or provide an equivalent response.

In Appendix B the section titled; "Radiation Safety Program – Maintenance" request that the licensee to respond by stating that you will either "implement or maintain procedures for routine maintenance of our gauges according to each manufacturer's recommendation or instructions. Non-Routine Maintenance: We will send the gauge to the manufacturer or other person authorized by the NRC or an Agreement State to perform non-routine maintenance" OR you can request to perform non-routine maintenance providing the information requested in Appendix G of NUREG 1556 Vol. 1 Rev. 1. to support conducting non-routine maintenance. Please provide a response that commits to one of these recommended responses or provide an equivalent response.

In addition we noted that in Item 3 of your application you did not request the use of materials at temporary jobsites where the NRC maintains jurisdiction as your current license allows. Please provide clarification for where you would like to be authorized to use your licensed material.

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 Agencywide Documents Access and Management System (ADAMS), accessible from the NRC Web site at http://www.nrc.gov/reading-rm/adams.html.

Address your written response to my attention at the above address and please be sure to reference Control No. 575199 to facilitate proper handling in our office. As a reminder, please provide the information requested in writing, accompanied by a transmittal letter that is appropriately dated and signed by a senior management official.

ACTION REQUIRED

Please submit the requested information within 7 calendar days (by November 14, 2011) by referencing control number **575199** to facilitate proper handling. Upon receipt of your response we will resume our review. Address your written response to my attention at the above address.

PLEASE DIRECT ANY QUESTIONS YOU MAY HAVE TO MICHAEL G. HERR, CHP at 630-829-9752 OR AT (800) 522-3025, EXT. 9752.

Michael G. Herr, CHP