Kingsford Manufacturing Company

11/9/2011

Ms. Colleen Carol Casey
Materials Licensing Branch
United States Nuclear Regulatory Commission
Region III
2443 Warrenville road ste 210
Lisle, Ill 60532-4352

RE: Application Updates for Material License #24-20121-01

Dear Ms. Casey:

In response to our phone discussion and the requested information faxed on 11/8/2011

Item 1: See attached completed Table B.1 pages B-1-B-7

Item 2: See attached Delegation of Authority to add ARSO.

Item 3: In my absence for the inspection on March 16, 2011 Mr. Kulzer asked to inspect only 6 gauges. For the record and per our most recent application, we have 41 gauges on site.

Item 4: The RLL 1 gauges (4) were issued as general license and are under 1 mCI. The RLL-1 General License documentation is filed with the equipment information. I also called Ronan and spoke with Mr. Craig Caris who verified the information. 859-282-4720.

We have 37 specific licensed gauges and 4 general licensed gauges.

If any other clarification is needed please let me know.

Sincerely

Justin Dent-RSO

Cc: Steve Miller-Plant manager
Belle Radiation Safety file

21200 Maries Road 314
Belle, MO
65013

(573) 859-3316
FAX: (573) 859-3306

Delegation of Authority:

In the absence of Mr. Justin Dent (Radiation Safety Officer) a delegation of authority for primary ARSO to Mr. Mark Nilges and secondary ARSO to Mr. Randy Jones. Both Mr. Nilges and Mr. Jones have been with the company for 25+ years and have been designated ARSO's for many years. Mr. Dent, Mr. Nilges and Mr. Jones completed RSO training given by Ronan Engineering Co. years ago. The RSO and/or ARSO's here at the plant only do 6-month inspections and wipe testing. Any work with the actual nuclear source must be done by the device manufacturer.

11/10/11
Justin Dent-RSO

Mark Nilges 11-10-11
Mark Nilges-Prim ARSO

Randy Jones 11/10/2011
Randy Jones-Sec ARSO

11-10-11
Steve Miller-Plant Manager

Suggested Format for Providing Information Requested in Items 5 Through 11 of NRC Form 313

Table B.1 Items 5 & 6: Materials To Be Possessed and Proposed Uses

Yes	No	Radioisotope	Manufacturer or Distributor Model No.	Quantity	Use As Listed on SSD Certificate	Specify Other Uses Not Listed on SSD Certificate
		Cobalt-60	Sealed source manufacturer or distributor and model number: _____ Device manufacturer or distributor and model number: _____	Not to exceed either the maximum activity per source or maximum activity per device as specified in Sealed Source and Device Registration Certificate	Yes [ ] Specific description of the gauge use: _____	[X] Not applicable _____ [ ] Uses are: _____ (Submit safety analysis supporting safe use)
		Krypton-85	Sealed source manufacturer or distributor and model number: _____ Device manufacturer or distributor and model number: _____	Not to exceed either the maximum activity per source or maximum activity per device as specified in Sealed Source and Device Registration Certificate	Yes [ ] Specific description of the gauge use: _____	[X] Not applicable _____ [ ] Uses are: _____ (Submit safety analysis supporting safe use)
		Strontium-90	Sealed source manufacturer or distributor and model number: _____ Device manufacturer or distributor and model number: _____	Not to exceed either the maximum activity per source or maximum activity per device as specified in Sealed Source and Device Registration Certificate	Yes [ ] Specific description of the gauge use: _____	[X] Not applicable _____ [ ] Uses are: _____ (Submit safety analysis supporting safe use)
		Cesium-137	Sealed source manufacturer or distributor and model number: _____ Device manufacturer or distributor and model number: _____	Not to exceed either the maximum activity per source or maximum activity per device as specified in Sealed Source and Device Registration Certificate	Yes [X] Specific description of the gauge use: LEVEL INDICATION ON TANKS + BINS	[ ] Not applicable _____ [ ] Uses are: _____ (Submit safety analysis supporting safe use)

APPENDIX B

Yes	No	Radioisotope	Manufacturer or Distributor Model No.	Quantity	Use As Listed on SSD Certificate	Specify Other Uses Not Listed on SSD Certificate
		Americium-241	Sealed source manufacturer or distributor and model number: _____ Device manufacturer or distributor and model number: _____	Not to exceed either the maximum activity per source or maximum activity per device as specified in Sealed Source and Device Registration Certificate	Yes [ ] Specific description of the gauge use: _____ _____ _____ _____ _____ _____ _____	☒ Not applicable _____ [ ] Uses are: _____ (Submit safety analysis supporting safe use)
		Other Isotope (Specify):	Sealed source manufacturer or distributor and model number: _____ Device manufacturer or distributor and model number: _____	Not to exceed either the maximum activity per source or maximum activity per device as specified in Sealed Source and Device Registration Certificate	Yes [ ] Specific description of the gauge use: _____ _____ _____ _____ _____ _____ _____	☒ Not applicable _____ [ ] Uses are: _____ (Submit safety analysis supporting safe use)
		Financial Assurance Required ***and Evidence of Financial Assurance Provided***				

Table B.2 Items 7 Through 11: Training and Experience, Facilities and Equipment, Radiation Safety Program, and Waste Disposal

Item No. and Title	Suggested Response	Yes	Alternative Procedures Attached
7. Individual(s) Responsible For Radiation Safety Program And Their Training And Experience 7.1 Radiation Safety Officer Name: JUSTIN DENT	Before obtaining licensed materials, the proposed RSO will have successfully completed the training described in Criteria in the section entitled "Individual(s) Responsible for Radiation Safety Program and Their Training and Experience - Radiation Safety Officer" in NUREG-1556, Vol. 4, dated October 1998. **AND** ~~Before being named as the RSO, future RSOs will have successfully completed the training described in Criteria in the section entitled "Individual(s) Responsible for Radiation Safety Program and Their Training and Experience - Radiation Safety Officer" in NUREG-1556, Vol. 4, dated October 1998. Within 30 days of naming a new RSO, we will submit the new RSO's name to NRC to include in our license.~~	[X] X	[ ]
7. Individual(s) Responsible For Radiation Safety Program And Their Training And Experience 7.2 Authorized Users	PROPOSED AUTHORIZED USERS: Before using licensed materials, authorized users will have successfully completed the training described in Criteria in the section entitled, "Authorized Users" in NUREG-1556, Vol. 4, dated October 1998. Prime Sec. JUSTIN DENT, MARK NIKSS, RANDY JONES	[X]	[ ]
8. Training for Individuals Who in the Course of Employment are Likely to Receive Occupational Doses of Radiation in Excess of 1 mSv (100 mrem) in a Year (Occupationally Exposed Workers) and Ancillary Personnel	The applicant is *not* required to, and should not, submit is training program, for individuals who in the course of employment are likely to receive occupational doses of radiation in excess of 1 mSv (100 mrem) in a year (occupationally exposed workers) and ancillary personnel, to the NRC for review during the licensing phase.	Need Not Be Submitted with Application	

Item No. and Title	Suggested Response	Yes	Alternative Procedures Attached
9. Facilities and Equipment	We will ensure that the location of each fixed gauge meets the Criteria in the section entitled "Facilities and Equipment" in NUREG-1556, Vol. 4, dated October 1998.	[X]	[ ]
10. Radiation Safety Program - Audit Program	The applicant is *not* required to, and should not, submit its audit program to the NRC for review during the licensing phase.	Need Not Be Submitted with Application	
10. Radiation Safety Program - Survey Instruments	Surveys pursuant to 10 CFR 20.1501 will be performed by a person specifically authorized by the NRC or an Agreement State to perform these surveys. **OR** We will use instruments that meet the Criteria in the section entitled "Radiation Safety Program - Instruments," in NUREG-1556, Vol. 4, dated August 1998, and *one* of the following: Each survey meter will be calibrated by the manufacturer or other person authorized by the NRC or an Agreement State to perform survey meter calibrations. **OR** We will implement the model survey instrument calibration program in Appendix I to NUREG-1556, Vol. 4, dated October 1998.	[X]	[ ]
10. Radiation Safety Program - Material Receipt and Accountability	Physical inventories will be conducted at intervals not to exceed 6 months or at other intervals approved by the NRC, to account for all sealed sources and devices received and possessed under the license.	[X]	[ ]
10. Radiation Safety Program - Occupational Dosimetry	We will perform a prospective evaluation demonstrating that unmonitored individuals are not likely to receive, in one year, a radiation dose in excess of 10% of the allowable limits in 10 CFR Part 20 or we will provide dosimetry that meets the Criteria in the section entitled "Radiation Safety Program - Occupational Dosimetry," in NUREG-1556, Vol. 4, dated October 1998.	[X]	[ ]

Item No. and Title	Suggested Response	Yes	Alternative Procedures Attached
10. Radiation Safety Program - Public Dose	The applicant is not required to submit a response to the public dose section during the licensing phase. However, during NRC inspections, licensees must be able to provide documentation demonstrating, by measurement or calculation, that the total effective dose equivalent to the individual likely to receive the highest dose from the licensed operation does not exceed the annual limit for individual members of the public.	Need Not Be Submitted with Application	
10. Radiation Safety Program - Operating & Emergency Procedures	If the gauge meets one or more of the safety conditions specified in "Discussion," in the section entitled "Radiation Safety Program-Operating Emergency Procedures," in NUREG 1556, Vol. 4, dated August 1998 state the following: Operating and emergency procedures will be developed, implemented, maintained, and distributed, and will meet the Criteria in the section entitled "Radiation Safety Program - Operating and Emergency Procedures," in NUREG-1556, Vol. 4, dated August 1998.	[X]	[ ]
	For each gauge requested that does not meet one or more of the safety conditions specified in "Discussion," in the section entitled "Radiation Safety Program-Operating Emergency Procedures," in NUREG 1556, Vol. 4, dated August 1998 provide your operating, emergency and lock-out (if applicable) procedures to NRC for review.	[ ] Procedures Attached	
10. Radiation Safety Program - Leak Test	Leak tests will be performed at intervals approved by the NRC or an Agreement State and specified in the Sealed Source and Device Registration Certificate. 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. **OR**	[X]	[ ]
	We will implement the model leak test program published in Appendix M to NUREG-1556, Vol. 4, dated October 1998.	[ ]	

Item No. and Title	Suggested Response	Yes	Alternative Procedures Attached
10. Radiation Safety Program - Maintenance	ROUTINE MAINTENANCE We will implement and maintain procedures for routine maintenance of our fixed gauges according to each manufacturer's or distributor's written recommendations and instructions.	X	[ ]
	NON-ROUTINE MAINTENANCE OPERATIONS The gauge manufacturer, distributor or other person authorized by NRC or an Agreement State will perform non-routine operations such as installation, initial radiation survey, repair, and maintenance of components related to the radiological safety of the gauge, gauge relocation, replacement, and disposal of sealed sources, alignment, or removal of a gauge from service.	X	[ ] The information listed in Appendix N supporting a request to perform non-routing operations in-house is attached
10. Radiation Safety Program - Transportation	The applicant is *not* required to submit its response to transportation during the licensing process; this issue will be reviewed during inspection. However, the licensee should develop, implement, and maintain transportation procedures according to NRC and DOT regulations.	Need Not Be Submitted with Application	
10. Radiation Safety Program - Fixed Gauges Used at Temporary Job Sites	This is not applicable to our program. We will not use fixed gauges at temporary job sites. **OR**	X Not Applicable	
	We will develop, implement, maintain and distribute procedures that meet the Criteria in the section entitled "Radiation Safety Program - Fixed Gauges Used at Temporary Job Sites" in NUREG-1556, Vol. 4, dated October 1998.	[ ]	[ ]
10. Radiation Safety Program - Minimization of Contamination	The applicant is not required to submit a response to minimization of contamination if the applicant's responses meet the criteria for the following sections: Radioactive Material - Sealed Sources and Devices, Facilities and Equipment, Radiation Safety Program - Operating and Emergency Procedures, Radiation Safety Program - Leak Testing, and Waste Management - Gauge Transfer and Disposal.	Need Not Be Submitted with Application	

Item No. and Title	Suggested Response	Yes	Alternative Procedures Attached
11. Waste Management - Gauge Disposal & Transfer	The applicant is not required to submit a response to waste management during the licensing process. However, the licensee should develop, implement, and maintain gauge transfer and disposal procedures in its radiation protection program.	Need Not Be Submitted with Application	