

Michael H. Juba MS CIH
Vice President – Product Safety and Government Affairs



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Date: May 16, 2012

To: Licensing Assistance Team Nuclear Regulatory Commission Region 1 610-337-5269

From: Michael H. Juba

Pages: 11
Including cover

03029384

Subject: Koppers Inc. License Renewal Radioactive Material License #47-16933-02

Application materials for renewal of NRC License #47-16933-02 are attached.

Please contact Michael H. Juba at 412-227-2882 for clarification of information contained in this Application or with additional questions.

Sincerely

Michael H. Juba MS CIH
Vice President – Product Safety and Government Affairs
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<p>NRC FORM 313 U.S. NUCLEAR REGULATORY COMMISSION (05-2012) 10 CFR 30, 32, 33, 34, 35, 36, 39, and 40</p> <p style="text-align: center;">APPLICATION FOR MATERIALS LICENSE</p>	<p>APPROVED BY OMB: NO. 3150-0120 EXPIRES: (03/31/2012)</p> <p>Estimated burden per response to comply with this mandatory collection request: 4.3 hours. Submittal of the application is necessary to determine that the applicant is qualified and that adequate procedures exist to protect the public health and safety. Send comments regarding burden estimate to the Information Services Branch (T-5 F53), U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001, or by internet e-mail to Infocollects.Resource@nrc.gov, and to the Desk Officer, Office of Information and Regulatory Affairs, NEOB-10202, (3150-0120), Office of Management and Budget, Washington, DC 20503. If a means used to impose an information collection does not display a currently valid OMB control number, the NRC may not conduct or sponsor, and a person is not required to respond to, the information collection.</p>
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INSTRUCTIONS: SEE THE APPROPRIATE LICENSE APPLICATION GUIDE FOR DETAILED INSTRUCTIONS FOR COMPLETING APPLICATION. SEND TWO COPIES OF THE ENTIRE COMPLETED APPLICATION TO THE NRC OFFICE SPECIFIED BELOW.

<p>APPLICATION FOR DISTRIBUTION OF EXEMPT PRODUCTS FILE APPLICATIONS WITH:</p> <p>OFFICE OF FEDERAL & STATE MATERIALS AND ENVIRONMENTAL MANAGEMENT PROGRAMS DIVISION OF MATERIALS SAFETY AND STATE AGREEMENTS U.S. NUCLEAR REGULATORY COMMISSION WASHINGTON, DC 20555-0001</p> <p>ALL OTHER PERSONS FILE APPLICATIONS AS FOLLOWS:</p> <p>IF YOU ARE LOCATED IN:</p> <p>ALABAMA, CONNECTICUT, DELAWARE, DISTRICT OF COLUMBIA, FLORIDA, GEORGIA, KENTUCKY, MAINE, MARYLAND, MASSACHUSETTS, NEW HAMPSHIRE, NEW JERSEY, NEW YORK, NORTH CAROLINA, PENNSYLVANIA, PUERTO RICO, RHODE ISLAND, SOUTH CAROLINA, TENNESSEE, VERMONT, VIRGINIA, VIRGIN ISLANDS, OR WEST VIRGINIA,</p> <p>SEND APPLICATIONS TO:</p> <p>LICENSING ASSISTANCE TEAM DIVISION OF NUCLEAR MATERIALS SAFETY U.S. NUCLEAR REGULATORY COMMISSION, REGION I 2100 RENAISSANCE BOULEVARD, SUITE 100 KING OF PRUSSIA, PA 19406-2713</p>	<p>IF YOU ARE LOCATED IN:</p> <p>ILLINOIS, INDIANA, IOWA, MICHIGAN, MINNESOTA, MISSOURI, OHIO, OR WISCONSIN, SEND APPLICATIONS TO:</p> <p>MATERIALS LICENSING BRANCH U.S. NUCLEAR REGULATORY COMMISSION, REGION III 2443 WARRENVILLE ROAD, SUITE 210 LISLE, IL 60532-4352</p> <p>ALASKA, ARIZONA, ARKANSAS, CALIFORNIA, COLORADO, HAWAII, IDAHO, KANSAS, LOUISIANA, MISSISSIPPI, MONTANA, NEBRASKA, NEVADA, NEW MEXICO, NORTH DAKOTA, OKLAHOMA, OREGON, PACIFIC TRUST TERRITORIES, SOUTH DAKOTA, TEXAS, UTAH, WASHINGTON, OR WYOMING,</p> <p>SEND APPLICATIONS TO:</p> <p>NUCLEAR MATERIALS LICENSING BRANCH U.S. NUCLEAR REGULATORY COMMISSION, REGION IV 1600 E. LAMAR BOULEVARD ARLINGTON, TX 76011-4511</p>
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PERSONS LOCATED IN AGREEMENT STATES SEND APPLICATIONS TO THE U.S. NUCLEAR REGULATORY COMMISSION ONLY IF THEY WISH TO POSSESS AND USE LICENSED MATERIAL IN STATES SUBJECT TO U.S. NUCLEAR REGULATORY COMMISSION JURISDICTIONS.

<p>1. THIS IS AN APPLICATION FOR (Check appropriate item)</p> <p><input type="checkbox"/> A. NEW LICENSE</p> <p><input type="checkbox"/> B. AMENDMENT TO LICENSE NUMBER</p> <p><input checked="" type="checkbox"/> C. RENEWAL OF LICENSE NUMBER <u>47-16933-20</u> <i>RLJ</i></p>	<p>2. NAME AND MAILING ADDRESS OF APPLICANT (Include ZIP code)</p> <p>Koppers Inc. 436 Seventh Avenue Pittsburgh, PA 15219</p>
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<p>3. ADDRESS WHERE LICENSED MATERIAL WILL BE USED OR POSSESSED</p> <p>Koppers Inc. 100 Koppers Road Follansbee, WV 26037</p>	<p>4. NAME OF PERSON TO BE CONTACTED ABOUT THIS APPLICATION</p> <p>Michael H. Juba</p> <p>TELEPHONE NUMBER</p> <p style="text-align: right;">412 227-28</p>
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SUBMIT ITEMS 5 THROUGH 11 ON 8-1/2 X 11" PAPER. THE TYPE AND SCOPE OF INFORMATION TO BE PROVIDED IS DESCRIBED IN THE LICENSE APPLICATION GUIDE.

<p>5. RADIOACTIVE MATERIAL a. Element and mass number; b. chemical and/or physical form; and c. maximum amount which will be possessed at any one time.</p> <p>7. INDIVIDUAL(S) RESPONSIBLE FOR RADIATION SAFETY PROGRAM AND THEIR TRAINING EXPERIENCE.</p> <p>9. FACILITIES AND EQUIPMENT.</p> <p>11. WASTE MANAGEMENT.</p>	<p>6. PURPOSE(S) FOR WHICH LICENSED MATERIAL WILL BE USED.</p> <p>8. TRAINING FOR INDIVIDUALS WORKING IN OR FREQUENTING RESTRICTED AREAS.</p> <p>10. RADIATION SAFETY PROGRAM.</p> <p>12. LICENSE FEES (See 10 CFR 170 and Section 170.31)</p> <table style="width:100%; border-collapse: collapse;"> <tr> <td style="width:70%;">FEE CATEGORY</td> <td style="width:30%;">AMOUNT ENCLOSED \$</td> </tr> </table>	FEE CATEGORY	AMOUNT ENCLOSED \$
FEE CATEGORY	AMOUNT ENCLOSED \$		

13. CERTIFICATION. (Must be completed by applicant) THE APPLICANT UNDERSTANDS THAT ALL STATEMENTS AND REPRESENTATIONS MADE IN THIS APPLICATION ARE BINDING UPON THE APPLICANT.

THE APPLICANT AND ANY OFFICIAL EXECUTING THIS CERTIFICATION ON BEHALF OF THE APPLICANT, NAMED IN ITEM 2, CERTIFY THAT THIS APPLICATION IS PREPARED IN CONFORMITY WITH TITLE 10, CODE OF FEDERAL REGULATIONS, PARTS 30, 32, 33, 34, 35, 36, 39, AND 40, AND THAT ALL INFORMATION CONTAINED HEREIN IS TRUE AND CORRECT TO THE BEST OF THEIR KNOWLEDGE AND BELIEF.

WARNING: 18 U.S.C. SECTION 1001 ACT OF JUNE 25, 1948 62 STAT. 749 MAKES IT A CRIMINAL OFFENSE TO MAKE A WILLFULLY FALSE STATEMENT OR REPRESENTATION TO ANY DEPARTMENT OR AGENCY OF THE UNITED STATES AS TO ANY MATTER WITHIN ITS JURISDICTION.

CERTIFYING OFFICER - TYPE/PRINTED NAME AND TITLE Michael H. Juba VP Product Safety, Health and Governmental Affairs	SIGNATURE 	DATE 5/16/2012
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FOR NRC USE ONLY					
TYPE OF FEE	FEE LOG	FEE CATEGORY	AMOUNT RECEIVED	CHECK NUMBER	COMMENTS
			\$		
APPROVED BY				DATE	

APPENDIX I

**Application Materials for
Renewal of
NRC License #47-16933-02**

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

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 <input type="checkbox"/> Specific description of the gauge use: 	<input type="checkbox"/> Not applicable <input type="checkbox"/> 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 <input type="checkbox"/> Specific description of the gauge use: 	<input type="checkbox"/> Not applicable <input type="checkbox"/> 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 <input type="checkbox"/> Specific description of the gauge use: 	<input type="checkbox"/> Not applicable <input type="checkbox"/> 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 <input checked="" type="checkbox"/> Specific description of the gauge use: See Attached 	<input checked="" type="checkbox"/> Not applicable <input type="checkbox"/> Uses are: (Submit safety analysis supporting safe use)

			distributor and model number:	Registration Certificate	_____	supporting safe use)
	Americium-241	Sealed source 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 <input type="checkbox"/> Specific description of the gauge use:	<input type="checkbox"/> Not applicable <input type="checkbox"/> Uses are: _____ (Submit safety analysis supporting safe use)
	Other Isotope (Specify):	Sealed source 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 <input type="checkbox"/> Specific description of the gauge use:	<input type="checkbox"/> Not applicable <input type="checkbox"/> Uses are: _____ (Submit safety analysis supporting safe use)
<i>Financial Assurance Required and Evidence of Financial Assurance Provided</i>						

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: <u>Michael H. Juba</u>	Before obtaining licensed materials, the proposed RSO will have successfully completed the training described in Criteria in the section "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 "Individual(s) Responsible for Radiation Safety Program and Their Training and Experience - Radiation Safety Officer" in NUREG-1556, Vol. 4,	<input checked="" type="checkbox"/>	<input type="checkbox"/>

	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.		
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 "Authorized Users" in NUREG-1556, Vol. 4, dated October 1998.	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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	
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.	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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 October 1998, and <i>one</i> 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	<input checked="" type="checkbox"/>	<input type="checkbox"/>

	<p>calibrations.</p> <p>OR</p> <p>We will implement the model survey instrument calibration program in Appendix I to NUREG-1556, Vol. 4, dated October 1998.</p>		
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.	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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.	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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 and 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 October 1998 state the following:	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	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 October 1998.		
	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 October 1998 provide your operating, emergency and lock-out (if applicable) procedures to NRC for review.	<input type="checkbox"/>	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.	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	OR		
	We will implement the model leak test program published in Appendix M to NUREG-1556, Vol. 4, dated October 1998.	<input type="checkbox"/>	
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.		<input type="checkbox"/>
	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	<input checked="" type="checkbox"/>	<input type="checkbox"/> The information listed in Appendix N supporting a request to perform non-routing operations in-house is attached

	disposal of sealed sources, alignment, or removal of a gauge from service.		
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.	<input checked="" type="checkbox"/> Not Applicable	<input type="checkbox"/>
	OR		
	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.	<input type="checkbox"/>	
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	
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	

5. RADIOACTIVE MATERIAL TO BE POSSESSED**ITEM (1)**

- A. Cesium 137
- B. Sealed Source, Nuclear Chicago Model #5178A- Serial #B-80
- C. One (1) source not to exceed 50 millicuries

ITEM (2)

- A. Cesium 137
- B. Sealed Source, Kay Ray Model #7062- Serial #13036
- C. One (1) source not to exceed 50 millicuries

ITEM (3)

- A. Cesium 137
- B. Sealed Sources, Texas Nuclear Model #5206- Serial #B-120 and #B-121
- C. Two (2) sources not to exceed 500 millicuries each

ITEM (4)

- A. Cesium 137
- B. Sealed Sources, Texas Nuclear Model #5205- Serial #B-238 and #B-796
- C. Two (2) sources not to exceed 50 millicuries each

ITEM (5)

- A. Cesium 137
- B. Sealed Sources, Texas Nuclear Model #5200- Serial# B2244, B2245 and #B2246
- C. Three (3) sources not to exceed 50 millicuries each

6. PURPOSE(S) FOR WHICH LICENSED MATERIALS WILL BE USED

- | | | |
|-----------------|---------------------------|---|
| ITEM (1) | LOCATION:
DESCRIPTION: | Locked Storage
Robertshaw Controls Model 570-57157C CAN
Series Level Gauge
Texas Nuclear 5178-A source holder
Process Control Level Gauge |
| ITEM (2) | LOCATION:
DESCRIPTION: | Locked Storage
Kay-Ray Model 4800F Single Point Level System
Kay-Ray Model 7062P Source Holder
Kay-Ray Source Size Model 7700-C Series
Process Control Level Gauge |
| ITEM (3) | LOCATION:
DESCRIPTION: | #1 Batch Still Column
Texas Nuclear CND Series Continuous Level System
Texas Nuclear Model #5206 Source Holder
Process Control Level Gauge |
| ITEM (4) | LOCATION:
DESCRIPTION: | #1 Still Dehydrator and #1 Still Pitch Flash
Texas Nuclear CND Series Continuous Level System
Texas Nuclear Model #5205 Source Holder
Process Control Level Gauge |
| ITEM (5) | LOCATION:
DESCRIPTION: | #1 Still Fractionator (#B2245) High Level Gauge
Permanent Locked Storage (#B2244 and #B2246)
Texas Nuclear CND Series Continuous Level System
Texas Nuclear Model #5200 Source Holder
Process Control Level Gauge |

LICENSED SEALED SOURCES OF IONIZING RADIATION – PLANT SUMMARY

PLANT: Follansbee, WV

LICENSE #/EXPIRATION DATE: 47-16933-02/May 31, 2012

Manufacturer	Serial/ Identification #	Isotope	Initial Activity (millicuries)	Current Activity (millicuries)	Location of Device	Current Operating Status	Assay Date
Texas Nuclear	Serial # B238 Model #5205	Cesium 137	50 mCi	28	#1 Still Dehydrator	Active	12/86
Texas Nuclear	Serial # B796 Model #5205	Cesium 137	50 mCi	32	#1 Still Pitch Flash	Active	2/93
Texas Nuclear	Serial # B2245 Model #5200	Cesium 137	50 mCi	31	#1 Still Fractionator (high level)	Active	10/91
Texas Nuclear	Serial # B120 Model #5206	Cesium 137	500 mCi	280	#1 Batch Still (high level)	Active	12/86
Texas Nuclear	Serial # B121 Model #5206	Cesium 137	500 mCi	280	#1 Batch Still (low level)	Active	12/86
Texas Nuclear	Serial # B2244 Model #5200	Cesium 137	50 mCi	31	LOCKED STORAGE	Inactive	10/91
Texas Nuclear	Serial # B2246 Model #5200	Cesium 137	20 mCi	13	LOCKED STORAGE	Inactive	7/92
Nuclear Chicago	Serial #B80 Model 5178A Tag #1021	Cesium 137	50 mCi	22	LOCKED STORAGE	Inactive	4/76
Kay Ray	Serial #13036 Model # 7062	Cesium 137	50 mCi	24	LOCKED STORAGE	Inactive	11/80

The total activity of all Cesium 137 sealed source level control gauges at the Koppers Follansbee WV Plant equals approximately 0.7 curies

This is to acknowledge the receipt of your letter application dated

5/16/12, and to inform you that the initial processing which includes an administrative review has been performed.

Renewal (47-16933-02)
There were no administrative omissions. Your application was assigned to a technical reviewer. Please note that the technical review may identify additional omissions or require additional information.

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

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** 577547.
When calling to inquire about this action, please refer to this control number.
You may call us on (610) 337-5398, or 337-5260.