



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION I
2100 RENAISSANCE BOULEVARD, SUITE 100
KING OF PRUSSIA, PENNSYLVANIA 19406-2713

September 20, 2012

Docket No. 03029916
Control No. 577941

License No. 06-23678-01

Christopher Lill
Radiation Safety Officer
Wheelabrator Bridgeport, L.P.
6 Howard Avenue
Bridgeport, CT 06605

SUBJECT: WHEELABRATOR BRIDGEPORT, L.P., REQUEST FOR ADDITIONAL
INFORMATION CONCERNING APPLICATION FOR AMENDMENT TO
LICENSE, CONTROL NO. 577941

Dear Mr. Lill:

This is in reference to your application dated July 16, 2012, requesting to renew Nuclear Regulatory Commission License No. 06-23678-01. In order to continue our review, we need additional information regarding your request for authorization to perform non-routine maintenance. Your application and the additional information you provided on August 28, 2012, was reviewed and compared to the information requested in Appendix N of NUREG-1556, Volume 4. We need the following information to continue our review:

1. Describe the types of work, maintenance, cleaning, repair that involve:
 - a. Installation, relocation, or alignment of the gauge;
 - b. Components, including electronics, related to the radiological safety of the gauge (e.g., the source, source holder, source drive mechanism, shutter, shutter control, or shielding);
 - c. Replacement and disposal of sealed sources;
 - d. Removal of a gauge from service;
 - e. A potential for any portion of the body to come into contact with the primary radiation beam; and
 - f. Any other activity during which personnel could receive radiation doses exceeding NRC limits.

2. Identify who will perform non-routine operations and their training and experience.
 - a. Acceptable training would include manufacturer's or distributor's courses for non-routine operations or equivalent.
3. Submit procedures for non-routine operations. These procedures should ensure the following:
 - a. doses to personnel and members of the public are within regulatory limits and ALARA (e.g., use of shielded containers or shielding);
 - b. the source is secured against unauthorized removal or access or under constant surveillance;
 - c. appropriate labels and warning signs are used;
 - d. manufacturer's or distributor's instructions and recommendations are followed;
 - e. any non-manufacturer/non-distributor supplied replacement components or parts, or the use of materials (e.g., lubricants) other than those specified or recommended by the manufacturer or distributor are evaluated to ensure that they do not degrade the engineering safety analysis performed and accepted as part of the device registration; and
 - f. before being returned to routine use, the gauge is tested to verify that it functions as designed and source integrity is not compromised.
4. Confirm that individuals performing non-routine operations on gauges will wear both whole body and extremity monitoring devices or perform a prospective evaluation demonstrating that unmonitored individuals performing non-routine operations are not likely to receive, in 1 year, a radiation dose in excess of 10% of the allowable limits.
5. Verify possession of at least one survey instrument that meets the criteria in "Radiation Safety Program - Instruments in NUREG-1556, Vol. 4, 'Consolidated Guidance about Materials Licenses: Program-Specific Guidance about Fixed Gauges Licenses,' dated October 1998."

6. Describe steps to be taken to ensure that radiation levels in areas where non-routine operations will take place do not exceed 10 CFR 20.1301 limits. For example, you may do the following:
 - a. commit to performing surveys with a survey instrument (as described above);
 - b. specify where and when surveys will be conducted during non-routine operations; and
 - c. commit to maintaining, for 3 years from the date of the survey, records of the survey (e.g., who performed the survey, date of the survey, instrument used, measured radiation levels and the location of those measurements), as required by 10 CFR 20.2103.

The principal reason for requesting this information is to assist in the evaluation of the qualifications of individuals who will conduct the work and the radiation safety procedures they will follow.

Current NRC regulations and guidance are included on the NRC's website at www.nrc.gov; select **Nuclear Materials; Med, Ind, & Academic Uses**; then **Licensee Toolkits, see our toolkit index page**. You may also obtain these documents by contacting the Government Printing Office (GPO) toll-free at 1-866-512-1800. The GPO is open from 8:00 a.m. to 5:30 p.m. EST, Monday through Friday (except Federal holidays).

We will continue our review upon receipt of this information. Please reply to my attention at the Region I Office and refer to Mail Control No. 577941. You may submit your response to this request by fax if it is convenient to do so. The fax number is 610-337-5269. If you have any technical questions regarding this deficiency letter, please call me at (610) 337-5136.

Please note that the office of the Region I Division of Nuclear Materials Safety has moved effective May 9, 2012. Our new address is:

U. S. Nuclear Regulatory Commission
Region I
2100 Renaissance Blvd, Suite 100
King of Prussia, PA 19406-2713

C. Lill

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The NRC's Safety Culture Policy Statement became effective in June 2011. While a policy statement and not a regulation, it sets forth the agency's *expectations* for individuals and organizations to establish and maintain a positive safety culture. You can access the policy statement and supporting material that may benefit your organization on NRC's safety culture Web site at <http://www.nrc.gov/about-nrc/regulatory/enforcement/safety-culture.html>. We strongly encourage you to review this material and adapt it to your particular needs in order to develop and maintain a positive safety culture as you engage in NRC-regulated activities.

Sincerely,

Original signed by Scott Wilson

Scott Wilson
Health Physicist
Materials Security and Industrial Branch
Division of Nuclear Materials Safety

cc:
Ed Gusciara, E.H.S. Manager

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