

November 13, 2012

Ms. Jennifer Bishop
Materials Licensing Branch
United States Regulatory Commission, Region III
2443 Warrenville Road, Suite 210
Lisle, Illinois, 60532-4351

RE: License No. 21-24953-01
Control No. 577636

Dear Ms. Bishop:

In your Conversation Record, dated Nov.8, 2012, regarding. The performance of non-routine maintenance, you require information referenced in NUREG 1556, Vol. 1, Rev. 1, Section 8.10.9 and Appendix G. This is needed to continue my authorization to perform non-routine maintenance with the renewal of License 21-24953-01.

According to NUREG-1556, Vol. 1, Rev.1, Consolidated Guidance About Materials Licenses, Section 8.10.9 "MAINTENANCE", in order for me to perform "Non-routine maintenance ... that requires detaching the source or source rod from the gauge:..." I must submit the information listed in Appendix G, "Information Needed to Support Applicants Request to Perform Non-Routine Maintenance".

The information is as follows:

- The type of work to be performed that necessitates removal of the source rod is cleaning and lubrication of the inner bearings on the base unit.
- I, William Jackson, Troxler certified Radiation Safety Officer, Maintenance Planner II, Oakland County Facilities Planning & Engineering, is the only individual to perform non-routine maintenance on the Troxler 3400 nuclear gauge. I have been trained in radiological safety procedures and handling for 24 years. My latest re-certification training was conducted on January 24, 2006, in Lansing, Michigan. The course was "Troxler Nuclear Gauge Safety Training", conducted by the training department of Troxler Electronic Laboratories, Inc. Also I have received HazMat and gauge training on CPN nuclear gauges from Clines Technical Services, Inc. in Amanda Ohio on April of 2007.

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- The procedures for safe handling of the radioactive source are as follows:
 - To ensure doses to personnel and public are within regulatory limits and ALARA; all maintenance procedures will be performed within the approved restricted and secured storage area. This area includes a locked, 6' x 10' masonry enclosure within a locked 20' x 22' masonry enclosure. While inside the 6' x 10' masonry enclosure, the source rod is removed from the base unit and placed directly into the lead pig, which is also inside the smaller room. The base is then moved to the adjacent locked 20' x 22' masonry enclosure and the door to the smaller room is also closed and locked.
 - The source rod is secured against unauthorized removal and is under constant surveillance by removing it and placing it in the lead pig within the 6' x 10' room, and closing and locking the door.
 - Appropriate labels and signs are displayed on the doors leading into the larger room as well as the smaller room.
 - The manufacturer's instructions and recommendations are followed in accordance with the "3400-B Series Instruction Manual" by Troxler. Specifically, section VIII. "Working With The Radiation Sources" on page 21, and section IX. "Periodic Maintenance and Service", subsection B. "Mechanical Maintenance," on pages 22-23.
- William R. Jackson will always wear a Landauer whole body dosimeter with a monthly exchange, while performing non-routine maintenance. The Landauer dosimeter is a whole-body and extremity-monitoring device which demonstrates that individuals are not likely to receive, in one year, more than 10 percent of the applicable dose limits as illustrated in Figure 8.3 on page 8-15 in NUREG-1556, Vol. 1, Rev. 1.
- Oakland County Facilities Planning & Engineering possesses a survey instrument from Troxler. It is a "TroxAlert" radiation monitor, serial #1168, Source Serial #S564. The unit meets the following criteria:
 - Capable of detecting gamma radiation
 - Capable of measuring from 0.01 to 0.5 mSV/hr (1 to 50 mrem/hr)

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- Calibrated at least annually with radionuclide point sources emitting radiation of the type and energy of the sealed sources in the gauge
 - Calibrated at no less than 2 points, each located at approximately one-third and two-thirds of each scale: readings within +/-20 percent are acceptable
 - Calibrated by a person specifically licensed by NRC or an agreement state to calibrate radiation detection instruments
 - Checked for functionality prior to use
- The Steps to be taken to ensure that radiation levels in area where non-routine maintenance will take place do not exceed 10 CFR 20.1301 limits.
 - Perform surveys with the TroxAlert instrument while conducting non-routine maintenance
 - Surveys will be conducted approximately 6' from the source rod with the source rod in the lead pig and secured in the smaller enclosure, and approximately 4' from the base unit. This survey will be continuous during the entire process of non-routine maintenance and recorded in intervals not exceeding 10 min
 - Records of the survey will be maintained for 3 years from the date of the survey as required by 10 CFR 20.2103. The records will include the name of person who performed the survey date of the survey instrument used, and measured radiation levels correlated to location of those measurements.

As the Radiation Safety Officer for Oakland County Facilities Planning & Engineering, I am the only person that performs the "non-routine" maintenance on the Troxler, 3400 Series nuclear gauge. The cleaning procedures used are outlined in the Troxler 3400 series gauge instruction manual, section VIII, page 21, from manual.

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I am submitting the required information according to Appendix G, "Information Needed to Support Applicants Request to Perform Non-Routine Maintenance", in NUREG-1556, Vol. 1, Consolidated Guidance About Materials Licenses". Appendix G is referenced from Section 8.10.9 MAINTENANCE, "Non-routine maintenance or repair operations that require detaching the source or source rod from the gauge".

I trust this provides all the information needed to renew my Material License 21-24953-01.

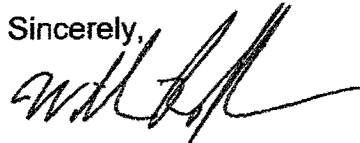
If I can be of further assistance, please do not hesitate to contact me at:

ADDRESS: Bill Jackson, Radiation Safety Officer, Facilities Engineering
One Public Works Drive
Waterford, MI 48328

OFFICE TELEPHONE: 248-858-0140, Mon. through Fri. 7:00 a.m. -3:30 p.m.

E-MAIL ADDRESS: jacksonb@co.oakland.mi.us

Sincerely,



William R. Jackson, Planner/RSO
Facilities Planning & Engineering

Cc: File

Dalzell-Bishop, Jennifer

From: Jackson, Bill [jacksonb@oakgov.com]
Sent: Wednesday, November 14, 2012 7:39 AM
To: Dalzell-Bishop, Jennifer
Subject: Scan of signed letter dated 11/13/12
Attachments: Scan2849.pdf

I hope that this will work. Thanks

William Jackson
Construction Planner
Oakland County
Department of Facilities Management
Facilities Planning and Engineering
248-858-0140 Office
248-343-6191 Cell