



CONVERSATION RECORD

09/05/2013

NAME OF PERSON(S) CONTACTED OR IN CONTACT WITH YOU Richard LaBurn		DATE OF CONTACT 09/05/2013	TYPE OF CONVERSATION <input type="checkbox"/> E-MAIL <input checked="" type="checkbox"/> TELEPHONE <input type="checkbox"/> INCOMING <input checked="" type="checkbox"/> OUTGOING
E-MAIL ADDRESS laburnr@dteenergy.com		TELEPHONE NUMBER (734) 586-4974	

ORGANIZATION Manager-Radiation Protection	DOCKET NUMBER(S) 030-37798; 030-18047; 030-10445; 030-04804; 030-008659; 030-04803
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LICENSE NUMBER(S) 21-32707-01; 21-02335-12; 21-02335-09; 21-02335-06; 21-02335-08; 21-02335-05;	CONTROL NUMBER(S) 581335; 581522; 581519; 581518; 581523; 581517
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SUBJECT  
Clarification and Additional Information Requested

SUMMARY

In your request, you have indicated that you will need to change the RSO listed on your license. Please note that you will not be able to change and name your RSO internally; NRC must do that for you via the amendment process.

1. Please provide a written signed (by both senior management and the proposed RSO) and a currently dated statement that stipulates your proposed RSO accepts the RSO position and understands the duties and responsibilities associated with the position. A sample Delegation of Authority memo is attached to this document in Attachment 1.
2. The current RSO, Thomas Lashley, is listed on licenses 21-32707-01, 21-02335-12; 21-02335-09, 21-02335-06, and 21-02335-05 to conduct non-routine maintenance. Please indicate in writing if Mr. Lashley should remain on the license to conduct non-routine maintenance. In addition, the proposed RSO, Robert Tozzie, is not currently listed on the license to conduct non-routine maintenance. In order for Mr. Tozzie to conduct non-routine maintenance, you will need to provide a written request and include training documentation showing he has had training. See the attached training

**Continue on Page 2**

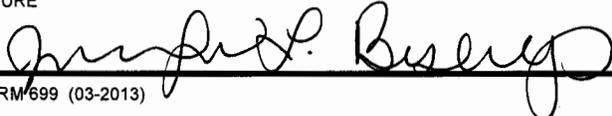
ACTION REQUIRED (IF ANY)

Submit the requested information within 14 calendar days (by September 19, 2013). Please contact me if you need to make alternative response arrangements.

In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice," a copy of this letter and its enclosure 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>.

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NAME OF PERSON DOCUMENTING CONVERSATION  
Jennifer L. Bishop

SIGNATURE  
 9/5/13

**CONVERSATION RECORD (continued)**

SUMMARY: (Continued from page 1)

3. For license 21-32707-01, in the cover letter to the request, you have requested to add an Endress+Hauser Model No. FSG60 gauge to your license, which does not appear to be a correct model number. The application attached to the letter has the gauge model listed as an Endress+Hauser Model No. FQG62. Please confirm the gauge model number.

Please note the following licenses will be due for renewal later this year:

1. License Number 21-02335-12 (November 30, 2013)
2. License Number 21-02335-05 (December 31, 2013)
3. License Number 21-02335-08 (December 31, 2013)

Please remember that a renewal application will need to be submitted to the NRC 30 days prior to the expiration of these licenses.



## Information Needed to Support Applicant's Request to Perform Non-Routine Operations

Applicants should review the section in this document on "Maintenance," which discusses, in general, licensee responsibilities before any maintenance or repair is performed.

Non-routine operations include installation of the gauge, initial radiation survey, repair or maintenance involving or potentially affecting 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), gauge relocation, replacement, and disposal of sealed sources, alignment, removal of a gauge from service, and any other activities during which personnel could receive radiation doses exceeding NRC limits. See Figure 8.9.

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 need to be evaluated to ensure that they do not degrade the engineering safety analysis performed and accepted as part of the device registration. Licensees also need to ensure that, after maintenance or repair is completed, the gauge is tested and functions as designed, before the unit is returned to routine use.

If non-routine operations are not performed properly with attention to good radiation safety principles, the gauge may not operate as designed and personnel performing these tasks could receive radiation doses exceeding NRC limits. Radionuclides and activities in fixed gauges vary widely. For illustrative purposes in less than one minute, an unshielded cesium-137 source with an activity of 100 millicuries can deliver 0.05 Sv (5 rems) to a worker's hands or fingers (i.e., extremities), assuming the extremities are 1 centimeter from the source. However, gauges can contain sources of even higher activities with correspondingly higher dose rates. The threshold for extremity monitoring is 0.05 Sv (5 rems) per year.

Thus, applicants wishing to perform non-routine operations must use personnel with special training and follow appropriate procedures consistent with the manufacturer's or distributor's instructions and recommendations that address radiation safety concerns (e.g., use of radiation survey meter, shielded container for the source, and personnel dosimetry (if required)).

Accordingly, provide the following information:

Describe the types of work, maintenance, cleaning, repair that involve:

- Installation, relocation, or alignment of the gauge
- 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)
- Replacement and disposal of sealed sources
- Removal of a gauge from service

## APPENDIX N

- A potential for any portion of the body to come into contact with the primary radiation beam; or
- Any other activity during which personnel could receive radiation doses exceeding NRC limits.

The principal reason for obtaining 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.

A licensee may initially mount a gauge, without specific NRC or Agreement State authorization, if the gauge's SSD Certificate explicitly permits mounting of gauges by users and under the following conditions:

- The gauge must be mounted according to written instructions provided by the manufacturer or distributor;
- The gauge must be mounted in a location compatible with the "Conditions of Normal Use" and "Limitations and/or Other Considerations of Use" in the certificate of registration issued by NRC or an Agreement State;
- The on-off mechanism (shutter) must be locked in the off position, if applicable, or the source must be otherwise fully shielded;
- The gauge must be received in good condition (package was not damaged); and
- The gauge must not require any modification to fit in the proposed location.

Mounting does not include electrical connection, activation, or operation of the gauge. The source must remain fully shielded and the gauge may not be used until it is installed and made operational by a person specifically licensed by the Commission or an Agreement State to perform such operations.

- **Identify who will perform non-routine operations and their training and experience. Acceptable training would include manufacturer's or distributor's courses for non-routine operations or equivalent.**
- **Submit procedures for non-routine operations. These procedures should ensure the following:**
  - doses to personnel and members of the public are within regulatory limits and ALARA (e.g., use of shielded containers or shielding);
  - the source is secured against unauthorized removal or access or under constant surveillance;
  - appropriate labels and signs are used;
  - manufacturer's or distributor's instructions and recommendations are followed;
  - 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

- before being returned to routine use, the gauge is tested to verify that it functions as designed and source integrity is not compromised.
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- 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 one year, a radiation dose in excess of 10% of the allowable limits.
  - 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.”
  - 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, applicants can do the following:
    - commit to performing surveys with a survey instrument (as described above);
    - specify where and when surveys will be conducted during non-routine operations; and
    - 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 correlated to location of those measurements), as required by 10 CFR 20.2103.

## Dalzell-Bishop, Jennifer

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**From:** Dalzell-Bishop, Jennifer  
**Sent:** Thursday, September 05, 2013 10:36 AM  
**To:** 'laburnr@dteenergy.com'; 'tozzier@dteenergy.com'  
**Subject:** Transmittal of Conversation Record  
**Attachments:** Scan001.pdf

Dear Mr. LaBurn,

Attached is the conversation record from our discussion this morning. Please send in your response by fax or email, with a signed cover letter, to 630-515-1078. Please note that in the attached guidance for non-routine maintenance, training is discussed on the second page.

Please feel free to contact me if you have additional questions.

Sincerely,

Jennifer Bishop  
Health Physicist

U.S. Nuclear Regulatory Commission, Region III  
Division of Nuclear Materials Safety  
Materials Licensing Branch  
[Jennifer.Dalzell-Bishop@nrc.gov](mailto:Jennifer.Dalzell-Bishop@nrc.gov)  
630-829-9607 (Office)