

**From:** [Lawyer, Dennis](mailto:Lawyer.Dennis)  
**To:** [herb.whitlatch@dupont.com](mailto:herb.whitlatch@dupont.com)  
**Subject:** E.I. DuPont, Request for Additional Information Concerning Application for a License Renewal, Control 583671  
**Date:** Wednesday, August 13, 2014 7:57:00 AM

---

Mr. Whitlatch,

This is in reference to your application dated June 24, 2014, and letter dated August 4, 2014, requesting for amendment to Nuclear Regulatory Commission License No. 47-01876-01, Docket No. 03006660. In order to continue our review, we need the following additional information:

1. In your letter dated August 4, 2014, you changed the Radiation Safety Officer to Herbert Whitlatch. The form stated that the candidate's training would be attached but it did not appear to be sent with the facsimile. Training should reflect qualifications of fixed gauges as well as portable gauges authorized on this license as reflected in NUREG-1556, Volume 1 (Consolidated Guidance About Materials Licenses Program-Specific Guidance About Portable Gauge Licenses) and 4 (Consolidated Guidance About Materials Licenses Program-Specific Guidance About Fixed Gauge Licenses.)
2. Your letter was not clear if Mr. Whitlatch should also be added as an Authorized User. Please state if Mr. Whitlatch should be added as an authorized user, which is License Condition 11 of your current license.
3. Your application gives very little information about your radiation instruments. NUREG-1556, Volume 4, Section 8.10.2, Instruments, gives acceptable responses associated with instruments. Based upon your program information, it is suggested that you respond as follows, "We will use survey instruments that meet the Criteria in the section entitled 'Radiation Safety Program - Instruments' in NUREG-1556, Vol. 4, 'Consolidated Guidance about Materials Licenses: Program-Specific Guidance about Fixed Gauge Licenses,' dated October 1998"; and "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."
4. Your application did not appear to give enough information about material accountability. NUREG-1556, Volume 4, Section 8.10.3 discusses material accountability and suggests the following commitment, "Physical inventories will be conducted at least every 6 months or at other intervals approved by the NRC, to account for all sealed sources and devices received and possessed under the license." Please provide this statement or alternate procedures.
5. Your application submitted your procedure 503, "Nuclear, X-Ray, and Laser." Your procedure does include many of the attributes as stated in NUREG-1556, Volume 4, Section 8.10.6 Operating and Emergency Procedures, but is missing some items like instructions for operating the gauge, cleaning and maintenance of the gauges, and others. Please state, "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, 'Consolidated Guidance about Materials Licenses: Program-Specific Guidance about Fixed Gauge Licenses,' dated October 1998.
6. Your submitted procedure also did not appear to include operating and emergency procedures for your portable gauge. NUREG-1556, Volume 1, Section 8.10.7, discusses operating and emergency procedures for these type devices. Please state, "Operating

and emergency procedures will be developed, implemented, and maintained, and will meet the criteria in the section entitled 'Radiation Safety Program – Operating and Emergency Procedures' in NUREG-1556, Vol. 1, Rev. 1, 'Consolidated Guidance about Materials Licenses: Program-Specific Guidance about Portable Gauge Licenses,' dated November 2001."

7. Your current license authorizes fixed gauge installation, initial radiation surveys, relocation, or removal from services of many different devices. It also authorizes maintenance and repair of devices and installation, replacement of certain devices. NUREG-1556, Volume 4, Section 8.10.8, Maintenance, states that Non-routine repair or maintenance must be performed by the fixed gauge manufacturer or distributor or a person specifically authorized by NRC or an Agreement State. Information to support requests for specific authorization to perform non-routine maintenance or repair is addressed in Appendix N of NUREG-1556, Volume 4. Please submit information as requested in Appendix N for authorization for non-routine maintenance and repair. Please be specific to the types of non-routine maintenance and repair and personnel to perform maintenance and repair that is being requested.
8. In Section 8.10.8, Maintenance of NUREG-1556, Volume 1, it states to provide the following for portable gauges, "We will implement and maintain procedures for routine maintenance of our portable gauges according to each manufacturer's recommendations and instructions." Along with, "We will send the portable gauge to the manufacturer or other person authorized by NRC or an Agreement State to perform non-routine maintenance or repair operations that require detaching the source or source rod from the gauge," or, provide the information listed in Appendix G supporting a request to perform this work in-house.
9. Devices identified as plant number J-4, J-5, J-10, J-21, and J-33, you provided drawings which showed sealed source as registered in the Sealed Source Device Registry. However with the information provided, we could not determine that the device was registered. As required in 10 CFR 30.32(g)(ii)(2), for devices manufactured before October 23, 2012 that are not registered with the Commission under 10 CFR 32.210(c) or with an Agreement State, and for which the applicant is unable to provide all categories of information specified in 10 CFR 32.210(c) of this chapter, the application must include all available information identified in 10 CFR 32.210(c) of this chapter concerning the device. Provide sufficient additional information to demonstrate that there is reasonable assurance that the radiation safety properties of the device are adequate to protect health and minimize danger to life and property. Such information must include a description of the device, a description of radiation safety features, the intended use and associated operating experience, and the results of a recent leak test.
10. For device, identified as plant number J-11, you removed the authorized use for this cobalt 60 source in the marked up license copy. What is the purpose of this source or is it storage only?

We will continue our review upon receipt of this information. Please reply to my attention at the Region 1 Office (Address below) and refer to Mail Control No. 583671. If you have technical questions regarding this letter, please call me at (610) 337-5366.

*Please note that you may not reply to this letter by return e-mail. Your reply must be in writing by letter or facsimile (610-337-5269). Please reply from you within 30 calendar days from the date of this e-mail..*

Region 1 Office Mailing Address: Licensing Assistance Team, US Nuclear Regulatory Commission Region I, 2100 Renaissance Boulevard, Suite 100, King of Prussia, PA 19406-2713.

Dennis Lawyer  
Health Physicist  
U.S. Nuclear Regulatory Commission  
Division of Nuclear Material Safety  
610-337-5366  
610-337-5269 (F)