City of Independence

WATER POLLUTION CONTROL DEPARTMENT

P.O. BOX 1019 • INDEPENDENCE, MISSOURI 64051-0519 • (816) 325-7711 • FAX (816) 325-7722

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December 1, 2014

Ms. Sara Forster
Materials Licensing Section
U.S. Nuclear Regulatory Commission, Region III
2443 Warrenville Road, Suite 210
Lisle, Illinois 60532-4351

Re: Material License No. 24-26236-01 Amendment, Control Number 585037

Dear Ms. Forster:

This is in response to your November 21, 2014 conversation record regarding the subject license amendment request.

Before being chosen to become the new RSO, Karla Pierce, Environmental Compliance Manager, successfully completed training as described in criteria in section 8.7.1 entitled "Radiation Safety Officer" in NUREG-1556, Vol. 4, "Consolidated Guidance about Materials Licenses: Program-Specific Guidance about Fixed Gauge Licenses," dated October 1998. Namely, on September 8, 2014, she viewed a video of an on-site fixed gauge manufacturer's course for users conducted at the time of installation of the gauges in October, 1990. Thomas Kravek, Senior Service Representative for TN Technologies, the gauge manufacturer, was the instructor. The course included detailed instructions on the proper precautions to be taken in utilizing these devices. Specific items of design detail, shutter operation, beam geometry, radiation levels and regulatory compliance were presented by trained personnel of TN Technologies at the time these devices were installed. The training session was videotaped.

In addition to the training description provided in our September 30 and November 5, 2014 letters, we are hereby providing additional information requested as follows:

Practical Explanation of the Theory and Operation for Each Gauge Possessed by the Licensee

- *Operating and emergency procedures*
  In addition to the training on operating and emergency procedures provided in the video of onsite training conducted by TN technologies, the gauge manufacturer, Ms. Pierce also received training on operating and emergency procedures from Dorris Bender, the existing RSO, on November 3, 2014.

  Ms. Pierce received additional training from Authorized User, Randy Dickinson, on November 25, 2014 on operation of the nuclear gauges, including demonstration of

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gauges. Our gauges are designed to operate automatically when the conveyor belt is turned on.

Randy Dickinson provided training on emergency procedures to be taken in the event that a nuclear weigh scale radioactive sealed source device becomes damaged or any other emergency or unusual situation arises:

- Stop usage of the gauge, restrict access to the area (20 feet for 1 device, 30 feet for both devices) using "Danger – Do Not Enter" tape on all doorways to area, notify RSO, Do not attempt to repair or authorize others to repair the gauge, RSO will notify appropriate entity such as the gauge manufacturer, Independence Ambulance/Fire/Police Dispatch, and US NRC.
- Emergency situations may include fire, explosion, mechanical damage, flood, earthquake or other situations that may arise.

- *Routine vs. Non-routine Maintenance*
  Ms. Pierce received additional training from Authorized User, Randy Dickinson, on November 25, 2014 on routine vs. non-routine maintenance as follows:
  - Our facility performs only routine maintenance at a frequency of once every 6 months which includes a physical inventory, test of on-off mechanism (shutter), with shutter closed – removing dust from the gauge housing, and replacing labels as needed.
  - Also considered routine is closing the shutter any time work is performed in the area
  - Our facility does not perform any non-routine maintenance including: installation, alignment, radiation surveys, relocation, removal from service, replacement, disposal, work on the radioactive source, source holder, source drive mechanism, shutter, shutter control or shielding.

- *Lock-out procedures*
  Ms. Pierce received additional training from Authorized User, Randy Dickinson, on November 25, 2014 on lock-out procedures, including demonstration of how to close the shutter and how to lock the device (lock attached by chain to the device).

<u>On-the-job training under the supervision of an AU</u>
Ms. Pierce received hands-on experience supervised by Authorized User, Randy Dickinson, on December 1, 2014 of

- Operating procedures
- Test run of emergency procedures
- Routine maintenance

- Lock-out procedures.

Operating procedures included both opening and closing of the shutter. Test run of emergency procedures included restricting the area after the device was locked out.

We hope this additional information satisfies NRC requirements to complete review of our license amendment request.

If you have any questions, please contact Karla Pierce at 816-325-7711.

Sincerely,

Dick Champion, Jr., Director
Water Pollution Control

DC:kp

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12/02/2014

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