

From: Ullrich, Elizabeth
To: ["vanessadel.srodriguez@cemex.com"](mailto:vanessadel.srodriguez@cemex.com)
Subject: renewal of your NRC license
Date: Tuesday, December 30, 2014 11:21:00 AM

CEMEX Puerto Rico, Inc.
License No. 52-25063-01
Docket No. 030-31255
Control No. 585498

Attention: Vanessa del S. Rodriguez

I am reviewing your renewal application, and need some additional information as described below.

1. Item 10.8 of your application, "Operating and Emergency Procedures" committed to developing operating and emergency procedures that meet the criteria in the section "Radiation Safety Program – Operating and Emergency Procedures" in NUREG-1556, Volume 1, Revision 1 dated November 2001 (NUREG-1556, Vol. 1). However, NUREG-1556, Vol. 1, is guidance for portable gauges. Please confirm that you will develop, maintain, and implement operating and emergency procedures that meet the criteria for fixed gauges in NUREG-1556, Volume 4, Section 8.10.6 and Appendix L.
2. Item 10.9 of your application states that the gauges will be sent to the manufacturer for non-routine maintenance. In accordance with Section 8.10.8 of NUREG-1556, Vol. 4, state that "The gauge manufacturer, distributor or other person authorized by NRC or an Agreement State will perform non-routine operations such as installation, initial radiation survey, repair, and maintenance of components related to the radiological safety of the gauge, gauge relocation, replacement, and disposal of sealed sources, alignment, or removal of a gauge from service."
3. You included Appendix B, "Radiation Safety Program" as part of the application. This Radiation Safety Program appears to be based on a general all-purpose radiation safety guidelines, some of which might not be applicable to your program. If I include this as part of your license, you will be required to implement these commitments, most of which were not in your 2004 application. I want to be sure that you intended to commit to these activities before I issue the license. All of the following questions refer to the Appendix B "Radiation Safety Program."
 - a. Sections 4.1 and 4.2 describe how you will post radioactive materials use areas. Given that you use fixed gauges, posting requirements may need to be implemented differently than as described in this section. Many gauges meet the exception to posting requirements described in 10 CFR 20.1903(c) if the radiation level at 30 centimeters from the gauge is less than 5 millirem per hour. Confirm if you are committing to the procedures in Section 4.1 and 4.2 of your Radiation Safety Program.
 - b. Sections 4.4, 4.5, 4.6, and 4.7 refer to radioactive contaminated areas, decontamination, major spills and minor spills, respectively. Because you

are using fixed gauges, contamination is not expected unless the sources leak or some other damage to the gauges occurs. Nor would spills of any kind be expected. These sections do not require you to do anything unless you have radioactive contamination, however, so they do not add additional activities to your current ones. Leaking gauges and other damage should be covered by your leak test procedures and your emergency procedures. No response is necessary, unless you wish to omit these sections from your license commitments.

- c. Section 5 discusses area surveys procedures. This section states that the RSO will perform a routine survey after use of radioactive material. Typically, such gauges as you possess are used continuously or on a daily basis; did you intend to require that surveys be done each day? Typically, the only surveys required are after installation or repair, and leak-tests at 6 month intervals, or the interval approved in the manufacturer's device registration, and such surveys are described in your operating procedures. Confirm if you do, or do not, want to commit to Section 5 as written.
- d. Section 7 describes procedures for ordering and receiving packages. This is typical for facilities such as hospitals that receive radioactive materials on a daily basis. This section would apply to you if you receive new gauges, however. No response is necessary.
- e. Section 8.1 states that access to posted areas will have locked doors or other means to prevent entry to unauthorized personnel, and that the access to posted areas will be attended when not closed and locked. Considering your requirements for posting in Section 4.1, confirm if you intend to meet this commitment for security of posted areas.
- f. Section 9 describes the qualification and training requirements for Principal Investigators. The term "principal investigator" usually refers to a laboratory researcher, rather than authorized users of gauges. However, it is an acceptable term if you wish to use it. This section further states that such users will have a minimum of 8 hours of training in topics listed in this section. However, Section 9 does not include topics important to the use of the gauges, such as: lock-out/tag-out procedures, operating procedures, emergency procedures, and maintenance activities. Please confirm the amount of time expected for training of authorized users of gauges, and confirm that the gauge-specific training topics will be covered.

Alternately, in accordance with Section 8.7 of NUREG-1556, vol. 4, you may commit to training authorized users as described in Section 8.7 and Appendix G, "Criteria for Acceptable Training of Authorized Users and Radiation Safety Officers."

The NUREG_1556, Vol. 4 guidance may be found at the following link:
<http://www.nrc.gov/reading-rm/doc-collections/nuregs/staff/sr1556/v4/sr1556v4.pdf>

Do not respond using a text email. Please provide your response by a signed hard-copy letter OR a pdf copy of a signed hard-copy letter OR a facsimile of a signed hard-copy

letter to 610-337-5269. Please include your license number and the control number in your response.

If you have any questions, please contact me by email at Elizabeth.ullrich@nrc.gov or by telephone at 610-337-5040.

Thanks,

Betsy

Betsy Ullrich

Senior Health Physicist

US NRC Region I Office

2100 Renaissance Boulevard, Suite 100

King of Prussia, PA 19464

(610) 337-5040 [office]

(484) 919-8348 [cell]

elizabeth.ullrich@nrc.gov