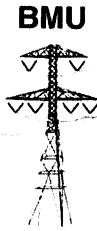


Board of Municipal Utilities



107 E. Malone
P.O. Box 370
Sikeston, Mo. 63801
Phone: (573)-471-3328
Fax: (573)-471-7288
www.sikestonbmu.org

SIKESTON POWER STATION



1551 W. Wakefield
P.O. Box 370
Sikeston, Mo. 63801
Phone: (573)-471-5000
Fax: (573)-471-5003
Miller71@sbmu.net

Edward Throop, General Manager

Don Miller, Plant Manager

February 13, 2015

U.S. Nuclear Regulatory Commission, Region III
2443 Warrenville Road, Suite 210
Lisle, IL 60532-4352

RE: License Amendment Request

Ms. Simmons:

I would like to revisit the request to amend our NRC License #24-18952-01. I would request that the authorized individual, Rick Landers, mentioned in Condition Nos. 11, 12, and 17.A. be changed to Steve Turnbow. Steve has worked with me in the RSO capacity since November, 2010. I've attached the agenda for his Radiation Safety Training Course, his Certificate of Completion, a copy of our current license, my delegation of authority to Steve, our procedure for removal/relocation and documentation that Steve has been trained on this procedure. If you have any further questions, please call me at 573-475-3112.

Thank you.

Sincerely,

Rick Landers
Radiation Safety Officer
Assistant General Manager

Attachments: RSO course outline, Certificate of Completion, NRC License #24-18952-01 (Amendment 13, 2nd Corrected Copy), Delegation of Authority, Removal/Relocation Procedures for Fixed Gauges at the Sikeston Power Plant, Documentation of Steve Turnbow training.

Sikeston Power Station

Sikeston Board of Municipal Utilities
(SIKE)

**Removal/Relocation Procedures for
fixed gauges at the Sikeston Power
Station**

Revised 02/12/15

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1. Scope:

Through the course of normal plant operations and maintenance, it may be necessary for the plant RSO to temporarily relocate or to remove a fixed gauge from its designated location. This may be caused by necessary plant maintenance, a decision to no longer use the fixed gauge or to replace it. In the case of maintenance, the presence of the fixed gauge may cause either a safety issue to maintenance personnel or the maintenance activity may cause a damage risk to the fixed gauge. In either case, the fixed gauge would need to be temporarily relocated to avoid either risk. In the case of no longer using the fixed gauge or replacing it, the fixed gauge may be removed, leak tested, and temporarily stored until ownership could be transferred back to the manufacturer or another entity properly licensed for such activity. This document lists the procedures for performing such actions.

2. RSO Notification & Responsibilities:

The RSO shall be notified prior to any maintenance activity that is to be performed on equipment on which a fixed gauge is attached. The RSO will then contact the supervisor of the proposed maintenance activity and discuss the scope of the work to be performed. This discussion will include safety issues for the employees, the general public, if applicable, and any risk to the fixed gauge from such activity. The proposed maintenance activity will not be initiated without this notification and review of the RSO. If a safety risk to a person or a risk to the fixed gauge is determined and there is no maintenance option that avoids these risks, the RSO will follow the proper procedures, listed in Section 3, to remove the fixed gauge and alleviate such risk.

In the course of plant operations and planning, should it be determined that the use of an existing fixed gauge is no longer needed or that the existing fixed gauge should be replaced, the RSO will be notified of such. At that time, the RSO will take full responsibility in the coordination and planning of such removal and will follow the proper procedures, listed in Section 4, for the initial removal of the fixed gauge from service.

3. Temporary Relocation:

The following steps are to be followed when relocating a fixed gauge for maintenance.

1. The manufacturer or their designate will be notified by the RSO. Any special procedures or directions from them will be followed.
2. The RSO will use appropriate personal monitoring equipment at all times during these relocation procedures.
3. The RSO will close and lock the fixed gauge shutter.
4. The fixed gauge and the bin/hopper containing the gauge will be removed from service using the plant clearance procedure
5. The RSO will perform a radiation survey on the fixed gauge and record the results.

6. The RSO will remove the fixed gauge from its mounting bracket,
7. The fixed gauge will then be placed in a container with the mounting side down and moved to the Scrubber basement.
8. Once in the Scrubber basement, the container and the fixed gauge will be placed in the caged area.
9. The door to the caged area will then be closed and locked by the RSO, using the RSO lock. The only key to this lock belongs to the RSO.
10. The RSO will then place Radiation signs on the perimeter and door of the caged area. This may include signage and boundary tape beyond the perimeter of the caged area, if the RSO deems it necessary for proper visibility of the warning.
11. Upon completion of the maintenance, the RSO will remove the container, fixed gauge and Radiation signs from the caged area.
12. The RSO will then return the fixed gauge to its original location and remount it on its mounting bracket.
13. At this point, the RSO should perform another radiation survey of the fixed gauge and record the results. If the results of the final radiation survey indicate a problem, the RSO should investigate the cause of such problem. If the problem is deemed significant, the RSO should return the source to the caged area, repeating steps #6 - #10 and consult the manufacturer before taking any other actions. If the results of the radiation survey are acceptable, the RSO should continue putting the fixed gauge back in service.
14. Once re-attached to its mounting brackets, the RSO should complete the plant clearance procedure by unlocking and opening the shutter and removing the device from the clearance.
15. The RSO should then verify the proper performance of the fixed gauge. Any improper operation of the fixed gauge should be investigated and corrected.

4. Removal From Service:

The following steps are to be followed when removing a fixed gauge for replacement or retirement of the gauge.

1. The manufacturer or their designate will be notified by the RSO. Any special procedures or directions from them will be followed.
2. The RSO will use appropriate personal monitoring equipment at all times during these removal procedures.
3. The RSO will close and lock the fixed gauge shutter.
4. The fixed gauge and the bin/hopper containing the gauge will be removed from service using the plant clearance procedure.
5. The RSO will perform a radiation survey on the fixed gauge and record the results.
6. The RSO will remove the fixed gauge from its mounting bracket.
7. The fixed gauge will then be placed in a container with the mounting side down and moved to the Scrubber basement.
8. Once in the Scrubber basement, the container and the fixed gauge will be placed in the caged area.

9. The door to the caged area will then be closed and locked by the RSO, using the RSO lock. The only key to this lock belongs to the RSO.
10. The RSO will then place Radiation signs on the perimeter and door of the caged area. This may include signage and boundary tape beyond the perimeter of the caged area, if the RSO deems it necessary for proper visibility of the warning.
11. If the removed/retired fixed gauge is to be replaced, the RSO will then work with the manufacturer's representative of the new fixed gauge as they install the new fixed gauge. Once installation is complete and the new fixed gauge is operating properly, the fixed gauge and bin/hopper will be returned to service using the plant clearance procedure.
12. If the removed/retired fixed gauge is not to be replaced, the RSO will work with plant staff to return the bin/hopper to service using the plant clearance procedure.
13. Should the retired/replaced fixed gauge be stored for longer than 10 years or ownership transferred to a properly licensed entity, the RSO will perform leak testing on the fixed gauge. In the case of transfer to a properly licensed entity, no transfer will be done until the results of the leak tests have been received and deemed acceptable.
14. Removal from the plant site of the retired/replaced fixed gauge will only be done with a transfer of ownership to a properly licensed entity. In this transfer, the provisions of 10 CFR 71 "Packaging and Transportation of Radioactive Material" will be followed by the RSO.

CERTIFICATE OF TRAINING

Steve Turnbow (RSO)

Employee's Name

Sikeston B.M.U.

Company/Department

Removal/Relocation of Nuclear Gauges

This training is for the removal and relocation procedures for fixed gauges at Sikeston Power Station.

This is to certify that I have attended the above training program which has informed me of the following:

- ☒ Scope of work
 - ☒ RSO Notifications and Responsibilities
 - ☒ Temporary Relocation of Fixed Gauges
 - ☒ Steps to Follow When Removing a Fixed Gauge
- _____

02/18/15
Date

02/18/15
Date

Steve Turnbow / RSO
Employee's Signature

Rick Sanders / RSO
Trainer's Signature

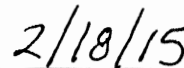
INTEROFFICE MEMORANDUM

TO: STEVE TURNBOW
FROM: RICK LANDERS
SUBJECT: DELEGATION OF AUTHORITY
DATE: FEBRUARY 18, 2015
CC: DON MILLER, LYNN HASTY, DWIGHT HUDDLESTON, MIKE DEWITT, BRYAN HOUSMAN, MARK MCGILL, RANDY PICK

You, **Steve Turnbow**, have been appointed Radiation Safety Officer and are responsible for ensuring the safe use of radiation. You are responsible for managing the Radiation Protection Program; identifying radiation protection problems; initiating, recommending, or providing corrective actions; verifying implementation of corrective actions; stopping unsafe activities; and ensuring compliance with regulations. You are hereby delegated the authority necessary to meet those responsibilities, including prohibiting the use of byproduct material by employees who do not meet the necessary requirements and shutting down operations, where justified, to maintain radiation safety. You are required to notify management if staff does not cooperate and does not address radiation safety issues. In addition, you are free to raise issues with the Nuclear Regulatory Commission at any time. You will be allowed any necessary time needed to perform your duties in this capacity. This appointed RSO responsibility becomes effective on the date the NRC approves an amendment to our license, specifically naming you as the Radiation Safety Officer.

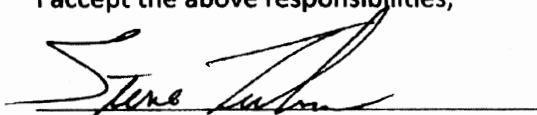


Signature of Management Representative

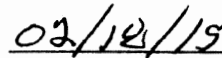


Date

I accept the above responsibilities,



Signature of Radiation Safety Officer



Date