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Item #1: Before using licensed materials, authorized users will have successfully completed the training described in Criteria in the section entitled 'Authorized Users', in NUREG-1556, Vol. 4, dated October 1998.

Item #2: All nuclear units are mounted in a secure site:

- a) gated site
- b) mounted in locations where they can't be removed without proper notification
- c) are mounted out of normal reach and require a lift to reach

Item #3: All units were surveyed at time of start-up and will be resurveyed only when one is removed or as required for safe operation. The RSO training also gave training on doing and recording radiation surveys and use of a survey meter. A radiation survey form includes not only 12 inch readings, but readings on the surface and background readings as well. The survey meter will be calibrated by the manufacturer or by a company authorized by the NRC or an Agreement State to do calibrations of meters. Each survey meter will be checked via a check source before use and after the meter is returned from calibration.

Item #4: Physical inventories will be conducted on all nuclear sources at least every six months to ensure the shutter is working properly, the unit is still mounted, unit is in good working condition, and to account for all sealed sources and devices received and possessed under this license. Each inventory will be recorded via a paper form and be signed, dated, and kept for a period of six (6) cycles or three (3) years before being put on computer file.

Item #5: All nuclear sources have less than 5mr/hr 30cm from the source and have less than 1mr/hr at the detector side. No source is mounted to provide access of the beam to any part of the body. All working locations have been checked to ensure no radiation levels will exceed 0.1mr in any year for people working within three (3) feet from the source up to six (6) hours at a time.

Item #6: The low level of nuclear sources meet and exceed the requirements for a general license device and a lock out tag out procedure is used to insure no device can be operated or used in an unsafe manner. The units can all be locked out and the RSO is the only person that can unlock any device after checking to ensure it can be opened in a safe manner. In an emergency, the source shutter will be closed if it can be done safely and without excessive exposure to personnel. If the source was involved in a fire where there are signs of melted lead, the source will be left alone and the RSO will be called. The area will be roped off to 2mR/hr in all directions and the RSO will call a person licensed to remove the damaged source. All Montana Refining emergency procedures will be

PUBLIC  
 Immediate Release  
 Normal Release

NON-PUBLIC

- A.3 Sensitive-Security Related
- A.7 Sensitive Internal
- Other: \_\_\_\_\_

Reviewer: JAC Date: 7/6/15

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followed (a copy of Montana Refining emergency procedures enclosed) with the only exception for rope off area, 300 feet down wind if a fire involved a nuclear unit.

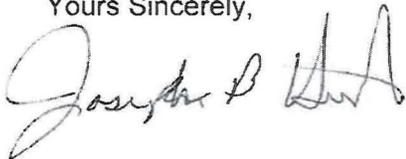
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Item #7: A leak test will be done at manufacturer's recommended intervals, not to exceed every three (3) years and the analysis of the leak test will be done via an NRC and/or Agreement State approved location. All leak test results will be kept on computer and the paper copy will be kept for three (3) cycles.

Item #8: Routine maintenance (i.e. shutter checks, cleaning, and calibration) will be done on an as needed basis and only routine maintenance will be done by people that have taken the RSO training class. Non-routine maintenance will be done via NRC or Agreement State Licensee able to perform functions required for safe operation of the unit. Non-routine maintenance (i.e. shutter repair and source head repair) will be done only by NRC and/or Agreement State Licensee licensed to do this type of work.

Item # 9: Please see Item #8.

Yours Sincerely,



Joseph B. Hirst, RSO  
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