



The Chemours Company
Edge Moor Plant
104 Hay Road
Wilmington, DE 19809

302-761-2218
chemours.com

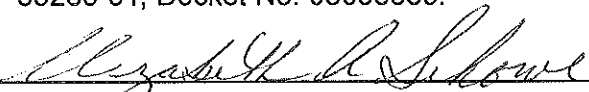
December 10, 2015

Dennis Lawyer
U.S. Nuclear Regulatory Commission (NRC) Region 1
2100 Renaissance Blvd., Suite 100
King of Prussia, PA 19406-2713

Subject: Additional information Requested Via 12/09/15 email NRC License No 07-35285-01

- 1) *Your application should have been signed by a management representative rather than the Radiation Safety Officer. Please submit a letter signed by a management representative indicating that management has reviewed the application and concurs in the statements and representations contained therein. Note also that a management representative should sign all future correspondence that requests a change in your license.*

I, Elizabeth A. Schowe, Edge Moor Plant Manager, Chemours, have reviewed the previously sent application and letter sent to the NRC, dated 11/03/15, for a change in our license use, reference Chemours NRC License Number: 07-35285-01, Docket No. 03038889.

Signature: 

Date: 12/10/15

- 2) You submitted for authorization to perform non-routine operations and used NUREG-1556, Volume 4, Appendix N as guidance. The following items in Appendix N did not appear to be submitted in your application, please submit the following:
- a. Please provide the training and experience for Gary C. Brown and Doug Sowards for performing the requested non-routine operations. See attached training record documents for Gary Brown and Doug Sowards. Mr. Browns experience in the field of radiation as the Radiation Safety Officer 2005 to current and Mr. Sowards experience as the back-up Radiation Safety Office 1998 – 2008 at the Hopewell Virginia DuPont site and the DuPont Edge Moor site 2008 to current.
 - b. Please confirm that appropriate labels and signs are used when performing non-routine operations. We confirm that the appropriate labels and signs are being used when performing non-routine operations.
 - c. Please confirm that you are using the manufacturer's or distributor's instructions and recommendations for these activities. We confirm we are and will continue to use the manufacturers or distributor's instructions and recommendations for these activities.
 - d. Please confirm that you will test to verify that the gauge functions are as designed and source integrity is not compromised when returning to service. We confirm we will test to verify that the gauge functions are as designed and source integrity is not compromised when returning to service.
 - e. Confirm that personnel with wear extremity monitoring devices or your will perform a prospective evaluation demonstrating that unmonitored individuals performing non-routing operations are not likely to receive in one year a radiation dose in excess of 10% of the allowable limits. We confirm that personnel will wear extremity monitoring devices or we will perform a prospective evaluation demonstrating that unmonitored individuals performing non-routine operations are not likely to receive in one year a radiation dose in excess of 10% of the allowable limits.
 - f. Please confirm you have at least one instrument that meets the criteria in "Radiation Safety Program-Instruments in NUREG-1556, Volume 4, 'Consolidated Guidance About Material Licenses: Program-Specific Guidance about Fixed Gauges Licenses,' dated October 1998." We confirm the site has at least one instrument that meets the criteria in "Radiation Safety Program-Instruments in NUREG-1556, Volume 4, Consolidated Guidance About Material Licenses: Program-Specific Guidance about Fixed Gauge Licenses, "dated October 1998."
 - g. Commit to maintaining, for 3 years from the date of the survey, records of the survey (e.g., who performed the survey, date of the survey, instrument used, measured radiation levels correlated to location of these measurement) as required by 10 CFR 20.2103. We commit to maintaining, for 3 years from the date of the survey, records of the survey (e.g., who performed the survey, date of the survey, instrument used, measured radiation levels correlated to the location of these measurements) as required by 10 CFR 20.2013.

We thank you for your cooperation and attention in this manner. If you have any questions or need additional information, please do not hesitate to contact me at 302-761-2036 / gary.c.brown-2@chemours.com.

Regards,

Elizabeth A. Schowe
Chemours Edge Moor Plant Manager



Date: 12/10/15

Gary C. Brown
Chemours Edge Moor Site Radiation Safety Officer



Date: 12-10-15



HUMBOLDT SCIENTIFIC, INC.
RSO Certification

Douglas W. Sowards
HAS SUCCESSFULLY COMPLETED A CERTIFIED
RADIATION SAFETY OFFICER COURSE

Subjects included were:
RSO Duties and Responsibilities
Radiation Safety Practices
Regulatory Requirements
Dose/Shielding Requirements
Accidents/Storage
Regulatory Guidance (NUREG-1556, Vol. 1)
Transportation/HAZMAT Requirements

Risk
ALARA
Radiation Measurement
Operating and Emergency Procedures
Calibration and Maintenance
Record Keeping

Date of Training: December 12, 2006
Location: Richmond, VA
Certificate Number: 6784
HAZMAT Expiration Date: December 12, 2009

Instructor: Keith Eamshaw
Humboldt Scientific, Inc.
551-D Pylon Drive
Raleigh, NC 27606

Certificate of Training

Awarded To

Gary C. Brown

Recognizing completion of 40 hours of specialized instruction in

Radiation Safety Officer

January 14, 2005

Presented By

Radiation Safety Academy
481 North Frederick Avenue, Suite 302
Gaithersburg, Maryland 20877

AAHP has awarded this course 32 Continuing Education Credits, 2003-00-018
ABIH has awarded this course 4.5 CM Points, CM Approval # 04-185



Raymond Johnson, MS, PE, RSO, FHPS, CHP
Academy Director

