To: Mr. Leo Wardrobe

From: Mark Gilliam - Superintendent SWVA Melting/Casting

Subject: SWVA, INC., Request for additional information concerning application for renewal of license – 47-16310-02, control no. 589847

Dear Mr. Wardrobe,

Please find attached the information that your agency has requested through communication with SWVA, RSO - Jason Rulen. If you have any further requirements please notify either me at: 304-696-8215/mgilliam@swvainc.com or Jason at: 304-696-8234/jrulen@swvainc.com.

Thank You,

Mark Gilliam

Steel of West Virginia

Mark Bull

Superintendent Melting/Casting

## APPENDIX B

SUGGESTED FORMAT FOR PROVIDING INFORMATION REQUESTED IN ITEMS 5 THROUGH 11 OF U.S. NUCLEAR REGULATORY COMMISSION FORM 313

Items 5 & 6: Materials to be Possessed and Proposed Uses

Yes	No	Radionuclide	Manufacturer or Distributor Model No.	Quantity	Use as Listed on SSD Registration Certificate	Specify Other Uses Not Listed on SSD Registration Certificate
	~	Cobalt-60	Sealed source manufacturer or distributor and model number:  Device manufacturer or distributor and model number:	Require maximum possession limits per source or device and include the total possession limit.	Yes  Specific description of the gauge use:	O Not applicable Uses are: (Submit safety analysis supporting safe use)
	_	Krypton-85	Sealed source manufacturer or distributor and model number:  Device manufacturer or distributor and model number:	Require maximum possession limits per source or device and include the total possession limit.	Yes  Specific description of the gauge use:	☐ Not applicable ☐ Uses are:  (Submit safety analysis supporting safe use)
	~	Strontium-90	Sealed source manufacturer or distributor and model number:  Device manufacturer or distributor and model number:	Require maximum possession limits per source or device and include the total possession limit.	Yes  Specific description of the gauge use:	☐ Not applicable ☐ Uses are:  (Submit safety analysis supporting safe use)

Yes	No	Radionuclide	Manufacturer or Distributor Model No.	Quantity	Use as Listed on SSD Registration Certificate	Specify Other Uses Not Listed on SSD Registration Certificate
V		Cesium-137	Sealed source manufacturer or distributor and model number:  Device manufacturer or distributor and model number:	Require maximum possession limits per source or device and include the total possession limit	Yes Some Specific description of the gauge use:	Uses are: (Submit safety analysis supporting safe use)
	/	Americium- 241	Sealed source manufacturer or distributor and model number:  Device manufacturer or distributor and model number:	Require maximum possession limits per source or device and include the total possession limit.	Yes  Specific description of the gauge use:	☐ Not applicable ☐ Uses are:  (Submit safety analysis supporting safe use)
	/	Other Isotope (Specify):	Sealed source manufacturer or distributor and model number:  Device manufacturer or distributor and model number:	Require maximum possession limits per source or device and include the total possession limit.	Yes  Specific description of the gauge use:	☐ Not applicable ☐ Uses are: ☐(Submit safety analysis supporting safe use)

\* Five Sources listed
on Leak test Certificates
(ATTACHED)

## Items 7 Through 11: Training and Experience, Facilities and Equipment, Radiation Safety Program, and Waste Disposal

Item I	No. and Title	Suggested Response	Yes	Alternative Procedures Attached
Ri Ri Pi Ti	dividual(s) esponsible For adiation Safety rogram and heir Training nd Experience	Provide documentation of the proposed radiation safety officer's training and experience.	Submit app	licable documentation.
	adiation safety fficer			
Name	: JASON Rulen			
Ri Ri Pi Ti ar	dividual(s) esponsible For adiation Safety rogram and heir Training nd Experience uthorized	Before using licensed materials, authorized users will have successfully completed one of the training courses described in the "Criteria" part of the section entitled "Authorized Users" in the current version of NUREG-1556, Volume 4, "Consolidated Guidance about Materials Licenses: Program-Specific Guidance about Fixed Gauge Licenses."		
	sers			
8. Ti	raining for ndividuals Who in the Course of Employment are Likely to Receive Occupational Doses of Radiation in Excess of I mSv (100 mrem) in a Year Occupationally Exposed Workers) and Ancillary	The applicant is <i>not</i> required to, and should not, submit its training program for individuals who in the course of employment are likely to receive occupational doses of radiation in excess of 1 mSv (100 mrem) in a year (occupationally exposed workers) and ancillary personnel to the NRC for review during the licensing phase.		be submitted with pplication.

Item No. and Title		Suggested Response	Yes	Alternative Procedures Attached
9.	Facilities and Equipment	We will ensure that the location of each fixed gauge meets the criteria in Section 8.9, "Facilities and Equipment," in the current version of NUREG-1556, Volume 4, "Consolidated Guidance about Materials Licenses: Program-Specific Guidance about Fixed Gauge Licenses."	<b>2</b>	
		OR		
		Provide confirmation that the fixed gauge is secured to prevent unauthorized removal or access and submit specific information demonstrating that the proposed conditions will not impact the safety or integrity of the source or device. Address any instances in which the proposed conditions exceed any conditions listed in the SSD registration certificate.		
10.	Radiation Safety Program – Audit Program	The applicant is <i>not</i> required to, and should not, submit its audit program to the NRC for review during the licensing phase. The audit program will be reviewed during NRC inspections.		e submitted olication.
10.	Radiation Safety Program – Instruments	Surveys according to 10 CFR 20.1501 will be performed by a person specifically authorized by the NRC or an Agreement State to perform these surveys.	<b>3</b>	0
		OR		
		We will use instruments that meet the criteria in Section 8.10.2, "Instruments," in the current version of NUREG-1556, Volume 4, "Consolidated Guidance about Materials Licenses: Program-Specific Guidance about Fixed Gauge Licenses" and <i>one</i> of the following:	0	
		Each survey meter will be calibrated by the manufacturer or other person authorized by the NRC or an Agreement State to perform survey meter calibrations.	٥	
		OR		
		We will implement the model survey instrument calibration program in Appendix F, "Model Survey Instrument Calibration Program" in the current version of NUREG-1556, Volume 4.	0	
		OR	_	
		We will submit alternative calibration procedures for NRC review. (Attach procedures).		

Item No. and Title		Suggested Response	Yes	Alternative Procedures Attached	
10.	Radiation Safety Program – Material Receipt and Accountability	Physical inventories will be conducted at intervals not to exceed 6 months or at other intervals approved by the NRC to account for all sealed sources and devices received and possessed under the license.	<b>T</b>	0	
10.	Radiation Safety Program – Occupational Dose	We will maintain, for inspection by the NRC, documentation demonstrating that unmonitored individuals are not likely to receive, in one year, a radiation dose in excess of 10 percent of the allowable limits in 10 CFR Part 20.	g	0	
		OR			
		We will provide dosimetry processed and evaluated by an NVLAP-approved processor that is exchanged at a frequency recommended by the processor.	0		
10.	Radiation Safety Program – Public Dose	The applicant is <i>not</i> required to submit a response to the public dose section in a license application. This matter will be examined during NRC inspections.		e submitted blication.	
10.	Radiation Safety Program – Operating and Emergency Procedures	If the gauge meets one or more of the safety conditions specified in the "Discussion" part of Section 8.10.6, "Operating and Emergency Procedures," in the current version of NUREG-1556, Volume 4, "Consolidated Guidance about Materials Licenses: Program-Specific Guidance about Fixed Gauge Licenses," state the following:  Operating, emergency, and security procedures will be developed, implemented, maintained, and distributed, and will meet the criteria in Section 8.10.6, "Operating and Emergency Procedures," in the current version of NUREG-1556, Volume 4.			
		AND/OR			
		For each gauge requested that does not meet one or more of the safety conditions specified in the "Discussion" part of Section 8.10.6, "Operating and Emergency Procedures," in the current version of NUREG-1556, Volume 4, provide your operating, emergency, and lock-out (if applicable) procedures to the NRC for review.	Procedures Attached		

Item No. and Title	Suggested Response	Yes	Alternative Procedures Attached	
10. Radiation Safety Program – Leak Tests	Leak tests will be performed at intervals approved by the NRC or an Agreement State and specified in the SSD registration certificate. Leak tests will be performed by an organization authorized by the NRC or an Agreement State to provide leak testing services to other licensees or using a leak test kit supplied by an organization authorized by the NRC or an Agreement State to provide leak test kits to other licensees and according to the kit supplier's instructions.		0	
	OR			
	We will implement the model leak test program published in Appendix I of the current version of NUREG-1556, Volume 4, "Consolidated Guidance about Materials Licenses: Program-Specific Guidance about Fixed Gauge Licenses."	0		
10. Radiation Safety Program – Maintenance	ROUTINE MAINTENANCE We will implement and maintain procedures for routine maintenance of our fixed gauges according to each manufacturer's or distributor's written recommendations and instructions.			
	NONROUTINE MAINTENANCE OPERATIONS The gauge manufacturer, distributor, or other person authorized by the NRC or an Agreement State will perform nonroutine operations, such as installation, initial radiation survey, repair and maintenance of radiological safety components, relocation, replacement, alignment, removal from service, and disposal of sealed sources.		The information listed in Appendix J, "Information Needed to Support Applicant's Request to Perform Nonroutine Operations," is attached.	
10. Radiation Safety Program – Transportation	The applicant is <i>not</i> required to submit its response about transportation during the licensing process. This issue will be reviewed during NRC inspections.	1655	pe submitted oplication.	

Item No. and Title		Suggested Response	Yes	Alternative Procedures Attached
10.	Radiation Safety Program – Fixed Gauges Used at Temporary Job	We will not use fixed gauges at temporary job sites.  OR	<b>9</b>	
	Sites	We will develop, implement, maintain, and distribute procedures that meet the criteria in Section 8.10.10, "Fixed Gauges Used at Temporary Job Sites," in the current version of NUREG-1556, Volume 4, "Consolidated Guidance about Materials Licenses: Program-Specific Guidance about Fixed Gauge Licenses," and provide copies of these procedures to all gauge users and make them available at all temporary job sites.		0
10.	Radiation Safety Program – Security Program	Licensees must ensure the security and control of licensed material. The regulations in 10 CFR 20.1801 and 20.1802 require licensees to secure radioactive materials from unauthorized removal or access while in storage and to control and maintain constant surveillance over licensed material that is not in storage.		e submitted plication.
11.	Waste Management – Gauge Disposal & Transfer	The applicant is not required to submit a response to waste management during the licensing process; however, the licensee should develop, implement, and maintain gauge transfer and disposal procedures in its radiation protection program.		e submitted plication.

No: 2071715

LEAK/WIPE TESTS CERTIFICATE

(PARTS A & B)

The leak test certificate includes a sampling certificate (Part A) and the laboratory measurement certificate (Part B).

Customer:

Steel of West Virginia 1604 Commerce Avenue Huntington, WV 25703

Contact Name: Jason Rulen Contact Phone: 304-696-8234

Contact Email: jrulen@swvainc.com

Organization:

Wipe Test Taken By:

Date: 07/14/15

Radiametrics Technologies

Jason Rulen

WIPED EQUIPMENT (PART A) Source Wipe # Make Model Device Serial Number Activity Isotope Device Location Serial No. 1 Ronan SA1-F37 Strand Spare 300mCi 7279CN Cs-137 Caster 2 Ronan SA1-F37 Strand 1 300mCi Cs-137 7272CN Caster 3 Strand 2 Ronan SA1-F37 300mCi Cs-137 7275CN Caster Strand 3 4 Ronan SA1-F37 300mCi Cs-137 7278CN Caster 5 SA1-F37 Ronan Spare 300mCi Cs-137 7276CN Caster

Ref	Source		Background	Net	A mbi vite v	T D II
KCI	Serial Number	Isotope	Counts	Counts	Activity	Test Results
1	7279CN	Cs-137	906	5	<.0001 µCi	PASS
2	7272CN	Cs-137	906	102	<.0001 µCi	PASS
3	7275CN	Cs-137	906	69	<.0001 µCi	PASS
4	7278CN	Cs-137	906	118	<.0001 µCi	PASS
5	7276CN	Cs-137	906	77	<.0001 µCi	PASS

Refers to the min. number of counts above background that have to be detected in order for the Net CPM value (above) to be considered significant at the 95% confidence level.

Counting Equipment: Measurement Date:

CAPRAC-T 2" x 2" NaI S/N: 010308

07/17/15

Ohio Materials License No. 03225480000

Certified by: Jeff Balogh

Date: 07/17/15

Signature:

