

Ragland, Randolph

From: Gregg Bloss <gtbloss@aep.com>
Sent: Monday, October 23, 2017 4:32 PM
To: Ragland, Randolph
Subject: [External_Sender] RE: Contact Information
Attachments: img-X23161719-0001.pdf

Mr. Ragland,

I have attached the information you requested with the plant managers signature please contact me if you have any question or need more information.



GREGG BLOSS | SAFETY & HEALTH CONSULTANT
GTBLOSS@AEP.COM | D:304.759.3411 | C:304.617.6970
1530 WINFIELD ROAD, WINFIELD, WV 25213

From: Ragland, Randolph [mailto:Randolph.Ragland@nrc.gov]
Sent: Tuesday, October 17, 2017 4:04 PM
To: Gregg Bloss
Subject: [EXTERNAL] Contact Information

This is an EXTERNAL email. STOP. THINK before you CLICK links or OPEN attachments. If suspicious please forward to rdc@nrc.gov for review.

Regards,

Randolph C. Ragland, Jr., CHP
Senior Health Physicist
NRC Region I
2100 Renaissance Boulevard, Suite 100
King of Prussia, PA 19406
610-337-5083 (office)
610-310-7799 (cell)
610-337-5269 (fax)

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

Items 5 and 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
		Isotope (Specify): Californium 252	Device manufacturer (or distributor) and model number: Thermo Electron Corp. Model CBX Belt Analyzer	Specify activity per source and number of gauges requested. 7 millicrouries per source 42 millicrouries maximum	Yes <input type="checkbox"/> Specific description of the gauge use: Cross belt element analyzer	<input checked="" type="checkbox"/> Not applicable <input type="checkbox"/> Uses are: (Submit safety analysis supporting safe use)
		Isotope (Specify):	Device manufacturer (or distributor) and model number:	Specify activity per source and number of gauges requested.	Yes <input type="checkbox"/> Specific description of the gauge use:	<input type="checkbox"/> Not applicable <input type="checkbox"/> Uses are: (Submit safety analysis supporting safe use)
		Isotope (Specify):	Device manufacturer (or distributor) and model number:	Specify activity per source and number of gauges requested.	Yes <input type="checkbox"/> Specific description of the gauge use:	<input type="checkbox"/> Not applicable <input type="checkbox"/> Uses are: (Submit safety analysis supporting safe use)
Is financial assurance required? If yes, submit evidence of financial assurance.						

NOTE: Copy and attach additional pages as needed.

**Items 7 through 11: Training and Experience,
Facilities and Equipment, Radiation Safety Program,
and Waste Disposal**

Item No. and Title	Suggested Response	Yes	Alternative Procedures Attached
7. Individual(s) Responsible For Radiation Safety Program and Their Training and Experience 7.1 Radiation safety officer Name: <u>Greg Bloss</u>	Documentation demonstrating the proposed radiation safety officer's training and experience (e.g., certificate of completion of the RSO's course and/or the authorized user's course).	Submit applicable documentation. <i>on current license</i>	
7. Individual(s) Responsible For Radiation Safety Program and Their Training and Experience 7.2 Authorized users	Before using licensed materials, authorized users will have successfully completed one of the training courses described in the "Criteria" part of the section titled, "Authorized Users" in NUREG-1556, Volume 4, Revision 1, "Consolidated Guidance About Materials Licenses: Program-Specific Guidance About Fixed Gauge Licenses."	<input checked="" type="checkbox"/>	<input type="checkbox"/>
8. Training for Individuals Working In or Frequenting Restricted Areas	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.		Need not be submitted with application.

Item No. and Title	Suggested Response	Yes	Alternative Procedures Attached
9. Facilities and Equipment	<p>We will ensure that the location of each fixed gauge meets the criteria in Section 8.9, "Facilities and Equipment," in NUREG-1556, Volume 4, Revision 1, "Consolidated Guidance About Materials Licenses: Program-Specific Guidance About Fixed Gauge Licenses."</p> <p style="text-align: center;">OR</p> <p>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.</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
10.1 Radiation Safety Program – Audit Program	The applicant should not submit its audit program to the NRC for review during the licensing phase. The audit program will be reviewed during NRC inspections.	Need not be submitted with application.	
10.2 Radiation Safety Program – Radiation Monitoring Instruments	<p>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.</p> <p style="text-align: center;">OR</p> <p>We will use instruments that meet the criteria in Section 8.10.2, "Radiation Monitoring Instruments," in NUREG-1556, Volume 4, Revision 1, "Consolidated Guidance About Materials Licenses: Program-Specific Guidance About Fixed Gauge Licenses" and <i>one</i> of the following two choices:</p> <p style="padding-left: 40px;">Each radiation survey meter will be calibrated by the manufacturer or other person authorized by the NRC or an Agreement State to perform radiation survey meter calibrations.</p> <p style="text-align: center;">OR</p> <p>We will implement the model radiation survey instrument calibration program in Appendix F, "Model Radiation Survey Instrument Calibration Program," in NUREG-1556, Volume 4, Revision 1, "Consolidated Guidance About Materials Licenses: Program-Specific Guidance About Fixed Gauge Licenses."</p>	<input checked="" type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	<input type="checkbox"/>

Item No. and Title	Suggested Response	Yes	Alternative Procedures Attached
10.3 Radiation Safety Program – Material Receipt and Accountability	<p>Physical inventories will be conducted every 6 months or at other intervals approved by the NRC to account for all sealed sources and devices received and possessed under the license.</p> <p style="text-align: center;">AND</p> <p>We will develop, implement, and maintain procedures for ensuring accountability of licensed materials at all times.</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
10.4 Radiation Safety Program – Occupational Dose	<p>We will maintain, for inspection by the NRC, documentation demonstrating that unmonitored individuals are not likely to receive a radiation dose in excess of the limits in 10 CFR 20.1502(a).</p> <p style="text-align: center;">OR</p> <p>We will provide and require the use of individual monitoring devices (dosimetry). All personnel dosimeters that require processing to determine the radiation dose will be processed and evaluated by a NVLAP-approved processor.</p>	<input checked="" type="checkbox"/> <input type="checkbox"/>	<input type="checkbox"/>
10.5 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.	Need not be submitted with application.	
10.6 Radiation Safety Program – Operating, Emergency, and Security Procedures	<p>If the gauge meets one or more of the safety conditions specified in the "Discussion" part of Section 8.10.6, "Operating, Emergency, and Security Procedures," in NUREG-1556, Volume 4, Revision 1, "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, Emergency, and Security Procedures," in NUREG-1556, Volume 4, Revision 1.</p> <p style="text-align: center;">OR</p> <p>If each gauge requested does not meet any of the safety conditions specified in the "Discussion" part of Section 8.10.6, "Operating, Emergency, and Security Procedures," in NUREG-1556, Volume 4, Revision 1, provide your operating, emergency, security, and lock-out (if applicable) procedures.</p>	<input checked="" type="checkbox"/> <input type="checkbox"/> Procedures Attached	<input type="checkbox"/>

Item No. and Title	Suggested Response	Yes	Alternative Procedures Attached
10.7 Radiation Safety Program – Leak Tests	<p>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 licensed by the NRC or an Agreement State to provide leak testing services to other licensees; or using a leak test sample collection kit supplied by an organization licensed by the NRC or an Agreement State to provide leak test kits and/or sample analysis services to other licensees and according to the kit supplier's instructions. Records of leak test results will be maintained.</p> <p style="text-align: center;">OR</p> <p>We will implement the model leak test program in Appendix I of NUREG-1556, Volume 4, Revision 1, "Consolidated Guidance About Materials Licenses: Program-Specific Guidance About Fixed Gauge Licenses." Records of leak tests will be maintained.</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/> For this item, checking this box indicates that alternative equipment and/or procedures will be provided as part of the application and that records of leak tests will be maintained.
10.8 Radiation Safety Program – Maintenance	<p><u>ROUTINE MAINTENANCE</u> We will implement and maintain procedures for routine maintenance of our gauges according to each manufacturer's or distributor's written recommendations and instructions.</p> <p><u>NONROUTINE MAINTENANCE OPERATIONS</u> 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.</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/> The information listed in Appendix J of this NUREG, "Information Needed to Support Applicant's Request to Perform Nonroutine Operations," is attached.
10.9 Radiation Safety Program – Transportation	The applicant is <i>not</i> required to submit a response about transportation during the licensing process. The NRC will review this issue during inspection.	Need not be submitted with application.	

Item No. and Title	Suggested Response	Yes	Alternative Procedures Attached
10.10 Radiation Safety Program – Fixed Gauges Used at Temporary Job Sites	<p>We will not use fixed gauges at temporary jobsites.</p> <p style="text-align: center;">OR</p> <p>We will address the use of fixed gauges at temporary jobsites in our operating, emergency, and security procedures developed in accordance with the Criteria in Section 8.10.6, "Operating, Emergency, and Security Procedures," of NUREG-1556, Volume 4, Revision 1, "Consolidated Guidance About Materials Licenses: Program-Specific Guidance About Fixed Gauge Licenses." Copies of these procedures will be provided to all gauge users and will be available at all temporary jobsites.</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
10.11 Radiation Safety Program – Security Program for Category 1 and Category 2 Radioactive Material	The applicant is <i>not</i> required to submit a response to the security program section in a license application. This matter will be examined during NRC inspections.	Need not be submitted with application.	
11. Waste Management – Gauge Disposal & Transfer	The applicant is <i>not</i> required to submit a response about waste management during the licensing process; however, the licensee should establish and include gauge transfer and waste disposal procedures in its radiation protection program.	Need not be submitted with application.	

Printed name - Aaron M. Sink
Signature - *A. M. Sink*
Title - Plant Manager