

From: Jay Borrell
To: [Wardrobe, Leonardo](#)
Cc: [Jay Borrell](#); [Jeffrey Todd](#)
Subject: [External_Sender] JELD-WEN inc. - Response to Request for Additional Information, Renewal Application, 602155
Date: Thursday, February 08, 2018 11:45:18 AM
Attachments: [JELD-WEN Response 2-8-18.PDF](#)
[JELD WEN 602155.PDF](#)

Mr. Wardrobe – please find the attached letter and information response utilizing Appendix B. Please let me know if this format is satisfactory and if you have further questions or needs. My Radiation Safety Course certificate is attached as the last page of the Appendix B pdf file.

Thank you for your call and assistance with this renewal.

JAY BORRELL | PLANT MANAGER

JELD-WEN | Fiber West Virginia
500 JELD-WEN Road
Craigsville, WV 26205
Office: 304-742-5180
Mobile: 304-619-3510
Email: jborrell@jeldwen.com

From: Wardrobe, Leonardo [<mailto:Leonardo.Wardrobe@nrc.gov>]
Sent: Wednesday, February 07, 2018 9:14 AM
To: Jay Borrell <jborrell@jeldwen.com>
Subject: Request for Additional Information, Renewal Application, 602155

JELD-WEN, Inc.

License No.: 47-25421-01
Docket No: 03034628
Control No: 602155

Mr. Borrell,

This refers to your letter, requesting to renew your license, dated January 3, 2018. In order to continue our review of your request, the following additional information is needed:

1. Please state the gauge manufacturer, model of gauge possessed, radioisotope used, activity per source and number of gauges requested.
2. Please provide either of the following:
 - a. The statement: "Before using licensed materials, authorized users (AU) will have successfully completed one of the training courses described in the 'Criteria' part of the section titled, 'Authorized Users' in NUREG-1556,

NUREG/RGN MATERIALS-002

- Volume 4, Revision 1, "Consolidated Guidance About Materials Licenses: Program-Specific Guidance About Fixed Gauge Licenses" or
- b. A description of the training and experience for proposed AUs.
3. Please provide either of the following:
- a. The statement: "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'" or
 - b. Provide confirmation that the fixed gauges are 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.
4. Please provide the following:
- a. The statement: "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, or
 - b. 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 *one* of the following two choices:
 - 1) 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, or
 - 2) We 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."
5. Please provide the following:
- a. The statement: "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), or
 - b. 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.

If you have any questions you may reference NUREG-1556, Volume 4, Revision 1, "Consolidated Guidance About Materials Licenses: Program-Specific Guidance About Fixed Gauge Licenses" located at:
[NRC: Consolidated Guidance About Materials Licenses: Program-Specific Guidance About Fixed Gauge Licenses. Final Report \(NUREG-1556, Volume 4, Revision 1\)](#) or you may call me at the below number.

Your reply must be an originally signed and dated letter. The letter may be scanned and

submitted as a pdf document attached to an email; or it may be transmitted by facsimile to (610) 337-5269; or it may be sent by regular mail. If we do not receive a reply from you within 30 calendar days from the date of this e-mail, we will assume that you do not wish to pursue your renewal request.

Leo Wardrobe

Health Physicist
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Via Email: leonardo.wardrobe@nrc.gov

02/08/2018

Mr. Leonardo Wardrobe
Health Physicist
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Commercial, Industrial, R&D, and Academic Branch
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King of Prussia, PA 19406-2713

Re: Request for Additional Information, Renewal Application 602155
JELD-WEN, inc.
License No. 47-25421-01
Docket No. 03034628
Control No. 602155

Dear Mr. Wardrobe:

The JELD-WEN, Inc facility located in Craigsville, West Virginia respectfully submits this letter in response to your request for additional information in regards to renewal application 602155 submitted February 7, 2018. Please find the attached pdf. file of Appendix B from the suggested format for providing information in Items 5 through 11 per your recommendation. Hard copies of this information can also be provided if desired.

Thank you for your call and explanation of the information required, this was very helpful. If you require additional information please email or call (304) 742-5180.

Thank you for your assistance,

JELD-WEN, Inc.

Jay Borrell
Plant Manager

APPENDIX B

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

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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): Cesium 137 | Device manufacturer (or distributor) and model number: Romar Engineering Co. Model: SA1-F37 | Specify activity per source and number of gauges requested. 10mCi 2 gauges | Yes <input checked="" type="checkbox"/> Specific description of the gauge use: Controlling Industrial Process | <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>Jay Borrell</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>Ohmart/VEGA 40 hr Course *see attached</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"/> Normal Use & Permanent Mount | <input type="checkbox"/> |
| 10.1 Radiation Safety Program -- Audit Program | <p>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.</p> | 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>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 type="checkbox"/> <input checked="" type="checkbox"/> Xetex 335B <input checked="" type="checkbox"/> Annual <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 | <p>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.</p> | 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"/> | <input type="checkbox"/> Procedures Attached |

| 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> | <p><input checked="" type="checkbox"/></p> <p>6 mo. interval</p> <p><input type="checkbox"/></p> | <p><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.</p> |
| 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> | <p><input checked="" type="checkbox"/></p> <p><input checked="" type="checkbox"/></p> | <p><input type="checkbox"/></p> <p><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.</p> |
| 10.9 Radiation Safety Program -- Transportation | <p>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.</p> | <p>Need not be submitted with application.</p> | |

| 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"/> | <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. | |

OHMARTV E&E

Jay Borrell

Feld-Wen Fiber of NC Marion, North Carolina

Has successfully completed the
Ohmart Radiation Safety Course

June 9 - June 13, 1997

Presented at Ohmart Corporation

Subject matter covered:

- Basic atomic theory
- Measurement and monitoring techniques
- Exposure calculations
- Biological effects of radiation
- NRC regulations
- Leak test, shutter check
- Installation, relocation, and removal procedures
- Hands on lab work
- Proper disposal practices
- Emergency procedures



George W. Brown
Radiation Safety Officer
Training Manager

OHMART Corporation

Technical Training Schools, Cincinnati, Ohio 45209