



CONVERSATION RECORD

NAME OF PERSON(S)/TITLE CONTACTED OR IN CONTACT WITH YOU <b>Craig Metzger</b>		DATE OF CONTACT <b>12/13/2018</b>	TYPE OF CONVERSATION <input type="checkbox"/> E-MAIL <input checked="" type="checkbox"/> TELEPHONE <input type="checkbox"/> INCOMING <input checked="" type="checkbox"/> OUTGOING	
E-MAIL ADDRESS <b>craig.metzger@gerdau.com</b>		TELEPHONE NUMBER <b>734-384-6544</b>		
ORGANIZATION <b>Gerdau Special Steel - MI and IN Operations</b>		DOCKET NUMBER(S) <b>030-14021</b>		
LICENSE NAME AND NUMBER(S) <b>Gerdau - Monroe Mill 21-18673-01</b>		MAIL CONTROL NUMBER(S) <b>610027</b>		
SUBJECT <b>Conversation Regarding Response to Request for Information dated Nov. 30 and Dec. 5, 2018</b>				
SUMMARY AND ACTION REQUIRED (IF ANY) This is in reference to the request for additional information responses submitted by Gerdau - Monroe Mill dated Nov. 30, 2018 and December 5, 2018, and the conversation that occurred between Laura Gender and Craig Metzger on Dec. 13, 2018.  Please provide your response to me via email by no later than 12/19/2018. Please ensure that your response to me is both signed and dated. As we discussed, I will follow up on Tuesday 12/18/2018 to check on the status of the response. In the meantime if you have any questions please feel free to contact me at 630-829-9712 or via email.  Per our discussion today, please provide your response to the following items:  1. Please clarify who will be providing the follow-up training to workers who were unable to attend the original training sessions held on Nov. 5-6th, 2018. Specifically, please confirm that the training will be provided by an appropriately qualified vendor or organization.  2. Please clarify that in your response to item 3.d. regarding the provided dosimetry evaluation that measurements in your calculation were actually generated from survey readings taken by Radiometrics, and were not generated from wipe (leak) test results.  3. Please confirm that you are also requesting to name Rob Edgar as an Authorized User in condition 11.A. of your license. Please also provide the described training document to Mr. Edgar as it was not attached to Appendix 3.				
NAME OF PERSON DOCUMENTING CONVERSATION <b>Laura B. Cender</b>				
SIGNATURE <i>Laura B. Cender</i>			DATE OF SIGNATURE <b>12/13/2018</b>	

**CONVERSATION RECORD (continued)**

LICENSE NAME AND NUMBER(S)

Gerdau - Monroe Mill  
21-18673-01

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**SUMMARY AND ACTION REQUIRED (IF ANY) (Continued)**

4. An older copy of NRC Form 313 dated September 13, 2018 was provided with your application as well as a letter dated November 30th, 2018. To prevent confusion with other documents that were previously provided with this same NRC Form 313 and date please confirm that it is okay if we remove this NRC Form 313 from your application. Going forward this submitted application will be referenced using the November 30, 2018 date provided with the letter.

5. In your response to Item 3.b. regarding future training sessions for new employees and refresher training sessions for current employees you state that records of these training sessions will be maintained. Please describe what will be included in these training records (i.e. date of training, names of attending individuals, topics covered, name of vendor providing the training, etc.).

6. In your response to Other Items - 1. Where you describe where and how source holders and replacement source rods will be secured, please address the following items.

- a. In the text description of where licensed material will be stored and secured provided on page 6 of the letter dated Nov. 30, 2018 there are references to the operating deck of the caster (caster deck), and the caster deck fenced in area. Neither of these locations are indicated in the figures provided in Attachment 7. Please update the diagrams provided to ensure that terminology used on the diagrams matches with the written descriptions provided.
- b. Please indicate on the overview diagram where source holders are currently stored as well as the location where the new bins will be installed. Please also indicate where the fenced or gated area will be on the diagram.
- c. Please clarify what the difference is between the "current storage locker" and the "current radiation storage cabinet" as depicted in the mold room overview diagram.
- d. In the second figure provided in Attachment 7 it appears that an image of a storage locker with four bins is superimposed on background that shows part of the operating plant. Please provide a caption to accompany this image that clarifies what is displayed in this photo, clarify if this area is where you are proposing the locker be secured, and if this is the area where the locker will be secured please provide a description of the surroundings.
- e. Please indicate where replacement source rods will be secured if they will not be stored in the new bins. Please ensure this location is indicated on the mold room overview diagram.

7. Please provide the following additional items and commitments regarding your procedures submitted with the letter dated December 5, 2018. You may submit a written response to these items as part of a letter and do not need to resubmit the procedures at this time.

- a. When reviewing the procedures provided with the letter dated December 5, 2018 it appears that there continues to be inconsistent terminology used that does not align with terminology used in other sections of your application, or in the verbal descriptions of the intended non-routine maintenance activities provided during our phone conversations. Specifically, in Tasks 11-15 of the procedures there continues to be use of inaccurate terms such as "source," "container/source container," "source lifting device," and other terms that do not accurately refer to the source holder. With your response please confirm that Gerdau employees will only work with the source holder when performing non-routine maintenance activities.
- b. Additionally, please confirm that no Gerdau employees will engage in non-routine operations that involve removal of the sealed source from the source holder device.
- c. In Tasks 14-15 workers are required to transfer licensed material to the "marked cabinet." Please clarify what is meant by "marked cabinet" and please clarify where the cabinet is located. Please ensure that your response is consistent with your response to Item 6 of this record.

**CONVERSATION RECORD (continued)**

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Gerdau - Monroe Mill  
21-18673-01

MAIL CONTROL NUMBER(S)

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**SUMMARY AND ACTION REQUIRED (IF ANY) (Continued)**

- e. Please clarify what is required of workers in Task 16 of this procedure where they are directed to post a "Caution, Radioactive Materials" sign. In the previous step the workers were required to secure the source holders in storage area with "Caution, Radioactive Materials" sign already posted. Please state where this additional sign will be placed.
- f. Please clarify if there is a process in place to check the source detectors to ensure they are working properly when they are returned to service.

## Cender, Laura

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**From:** Cender, Laura  
**Sent:** Thursday, December 13, 2018 3:14 PM  
**To:** 'Craig Metzger'  
**Cc:** Pelke, Patricia  
**Subject:** NRC License No. 21-18673-01 Pending Amendment - Additional Information Requested  
**Attachments:** 12.13.2018 Record of Conversation To Gerdau - Monroe Mill.pdf

Hello Craig,

Thank you for taking time out of your day to discuss the remaining information required to complete pending license amendment request.

As we discussed I will be planning to check in on Tuesday 12/18 and understand that you will be providing your response to me via email by no later than Wednesday 12/19. In the meantime please feel free to reach out to me at 630-829-9712 or via email if you have any questions.

Thank you,  
Laura

Laura Cender  
U.S. Nuclear Regulatory Commission  
Materials Licensing Branch  
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