



CONVERSATION RECORD

NAME OF PERSON(S)/TITLE CONTACTED OR IN CONTACT WITH YOU		DATE OF CONTACT	TYPE OF CONVERSATION	
Lawrence Gray		2/14/2019	<input type="checkbox"/> E-MAIL	<input type="checkbox"/> INCOMING <input checked="" type="checkbox"/> OUTGOING
E-MAIL ADDRESS		TELEPHONE NUMBER	<input checked="" type="checkbox"/> TELEPHONE	
lawrence.gray@clevelandcliffs.com		(906) 475-3521		
ORGANIZATION		DOCKET NUMBER(S)		
Empire Mine Partnership - Empire Mine		030-04814		
LICENSE NAME AND NUMBER(S)		MAIL CONTROL NUMBER(S)		
Empire Iron Mining Partnership - Empire Mine License No. 21-03076-01		610006		

SUBJECT
 NRC License Renewal for Empire Iron Mining Partnership - Empire Mine - Additional Information Required

SUMMARY AND ACTION REQUIRED (IF ANY)
 This is a record of the conversation that occurred between Lawrence Gray, RSO for Empire Iron Mining Partnership - Empire Mine regarding the license renewal application dated September 25, 2018 and additional letter dated November 30, 2018.

Per our discussion today, please provide your response to the following items detailed on page 2 of this record by no later than March 7, 2019. You may provide your response to me directly via email to laura.cender@nrc.gov, or to our office via fax to 630-515-1078. Please feel free to contact me at 630-829-9712 or on my cell phone at 217-493-0429 if you have any questions.

In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice," a copy of this letter and its enclosure will be available electronically for public inspection in the NRC Public Document Room or from the NRC's Agencywide Documents Access and Management System (ADAMS), accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams>.

NAME OF PERSON DOCUMENTING CONVERSATION	
Laura B. Cender	
SIGNATURE	DATE OF SIGNATURE
<i>Laura B. Cender</i>	2/14/2019

CONVERSATION RECORD (continued)

LICENSE NAME AND NUMBER(S)

MAIL CONTROL NUMBER(S)

Empire Iron Mining Partnership - Empire Mine
License No. 21-03076-01

610006

SUMMARY AND ACTION REQUIRED (IF ANY) (Continued)

1. Items 6.A.-9.A. on your license currently authorizes Vega-Americas (formerly Ohmart-Vega) SHLD1 devices, but these devices were not mentioned in either the letter dated September 25, 2018 or in the letter dated November 30, 2018. I understand from our conversation today that the devices have been transferred to Tilden Mine. To have these devices removed from your license please provide a copy of your most recent leak tests for the devices and a statement confirming that all SHLD1 devices previously possessed have been transferred to your Tilden Mining Company L.C. license.
2. The letter dated September 25, 2018 included a request to continue authorizing a number of instrument calibration sources, but disposal records provided with the letter dated November 30, 2016 appear to include a number of these sources. I understand from our conversation today that these sources are likely still at your Empire Mine facility. Please provide a statement confirming your request to either authorize or remove these instrument calibration sources from the license. If you request to remove these sources from your license, please confirm they are no longer located on site and provide complete disposal or transfer records.
3. Please provide a statement confirming that "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."
4. Please provide a statement confirming that upon authorization to restart principal activities that fixed gauges will not be used at temporary job sites.
5. Please provide a statement confirming that you will continue to conduct an audit annually and maintain records of annual audits in accordance with the requirements of 10 CFR Part 20.1101, 20.2102, and 20.2103(a).
6. Please provide a statement confirming your commitment to leak test sealed sources and devices containing sealed sources that are in storage at least once every 10 years, and within six months before use or transfer to an authorized recipient.
7. Please provide a statement confirming your commitment to maintain records in accordance with the requirements of 10 CFR 30.51, 10 CFR Part 20, and the conditions of your specific license.
8. Please provide the following commitment regarding routine maintenance activities: "We will implement and maintain procedures for routine maintenance of our gauges according to each manufacturer's or distributor's written recommendations and instructions."
9. Please provide the following commitment statement regarding non-routine maintenance activities: "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."
10. In the letter dated November 30, 2018 you provided a copy of a previous response dated August 31, 2016 that states that only persons deemed "trustworthy and reliable" are authorized to access the device storage area. Please confirm if this requirement is still in place as the regulations in 10 CFR Part 37 do not currently apply to your facility. Please note that commitments made during the licensing process continue to apply, even if not specifically required by the regulations.

Cender, Laura

From: Cender, Laura
Sent: Thursday, February 14, 2019 1:51 PM
To: 'Gray, Larry (Electrical)'
Subject: RE: Empire Mine - NRC License Renewal - Additional Information Required
Attachments: Record of Conversation to Empire Iron Mining Partnership dated Feb. 14 2019.pdf

Hello Larry,

Thank you for reaching out to me today regarding your pending license renewal request. As we discussed, I have attached a copy of our conversation record that details the remaining required items.

Please submit your **signed and dated** response by March 7, 2018 to me directly via email, or to our regional office via fax. I can be reached at 630-829-9712 or on my cell at 217-493-0429 if you have any questions.

Thank you for your attention to this matter.

Respectfully,
Laura Cender

Laura Cender
U.S. Nuclear Regulatory Commission
Materials Licensing Branch
E-mail: Laura.Cender@nrc.gov
Phone: (630) 829-9712

From: Cender, Laura
Sent: Tuesday, February 12, 2019 2:29 PM
To: 'Gray, Larry (Electrical)' <Lawrence.Gray@clevelandcliffs.com>
Subject: Empire Mine - NRC License Renewal - Additional Information Required

Hello Larry,

This email is in reference to your request to renew your NRC License No. 21-03076-01 for Empire Iron Mining Partnership. I have reviewed the additional information submitted with your response dated November 30, 2019 and discussed your file with one of our senior license reviewers. As a result of this review and discussions, I do have a few more questions before we can issue the license.

Please let me know of your availability and we can set up a time for a phone call to discuss the remaining items.

Thank you,
Laura Cender

Laura Cender
U.S. Nuclear Regulatory Commission
Materials Licensing Branch
E-mail: Laura.Cender@nrc.gov
Phone: (630) 829-9712