7/5-16/4

IN REPLY REFER TO:

1112.1 (033)

United States Department of the Interior

BUREAU OF LAND MANAGEMENT
LAS CRUCES DISTRICT OFFICE
1800 Marquess St.
Las Cruces, New Mexico 88005

DEC 3 1987

Ms. Joy A. Marshall
Nuclear Materials Licensing Section
Nuclear Regulatory Commission
Region IV
611 Ryan Plaza Drive, Suite 1000
Arlington, TX 76011

Dear Ms. Marshall:

In response to your letter dated November 23, 1987, and in support of our application (Control No. 419707) for a by-product material license, the following information is provided:

1. Safety procedures for transporting gauges or devices - Item 10.5.

Personnel authorized to transport or ship the gauging device are familiar with and adhere to the applicable requirements as set forth in Section 71.5 of 10 CFR 71 and Subpart E of 49 CFR Part 172. Transportation and shipping of the gauging device is conducted under the direct supervision of the District Radiation Officer to ensure compliance with all applicable requirements.

2. Operating and Emergency procedures - Item 10.6.

The enclosed Las Cruces District Radiation Safety Program Safety Procedures outline our internal requirements with regard to operating and emergency procedures.

We apologize for any inconvenience associated with our failure to accurately provide all the data necessary to complete our application. Should you have any questions or require additional information, please feel free to contact Rich Watts at FTS 571-8312 or Commercial 505-525-8228.

Sincerely,

Richard A Watts
for H. James Fox
District Manager

Enclosure

419707

BUREAU OF LAND MANAGEMENT

LAS CRUCES DISTRICT
RADIATION SAFETY PROGRAM
SAFETY PROCEDURES
NM-030-1112(R)
FY 1986

A. Transporting Gauge(s)

1. Gauge(s) will only be transported by authorized personnel in approved containers and vehicles. The gauge(s) may not be transported on the front or rear seats of any vehicle. When a vehicle is used to transport the gauge(s), the gauge(s) must be locked in its case and the case tied down or securely fastened; i.e., chain, bolts, etc., to the bed of the vehicle in order to prevent loss or to discourage theft. The gauge(s) will be placed in a minimum of 6 feet from the driver and passenger seat.

B. Temporary Job Site

1. When operating gauge(s) at job site, the person(s) using the gauge(s) will never under any circumstances leave the gauge unattended.

C. Operation of Gauge(s)

1. Be sure the gauge(s) and case are locked within an authorized enclosure; i.e., closet, steel cabinet, etc., when it is not in use. Security against theft of a radioactive source (material) is extremely important and the safety procedures must never be neglected. The storage enclosure should be plainly labeled with an approved type of radiation warning sign. Radiation levels at the outside surface of the storage enclosure must not exceed 2 Mrn/hr.

2. Under no circumstances will the user attempt to repair, modify, or open the sealed source.

3. When not in use, keep the gauge in the "Safe" or Storage position.

4. Keep unauthorized personnel away from the gauge.

5. A monitored check-out procedure of user and location will be kept by the Radiation Safety Officer (RSO).

6. Follow established operating procedures when using the gauge.

7. Wear a film badge at all times when operating or transporting the gauge(s). The film badges will be checked out with RSO before each project and returned to the RSO after each project.

D. Tests

1. Ensure that the gauge(s) is tested through the Leak Test Method every 6 months as stated in the Nuclear Regulatory Commission Materials License. Leak test will be performed as per instructions in the CPN Corporaton Test Kit. Leak test will be performed by Henry A. Diaz, RSO.

E. Accidents and Incidents

1. In case a gauge is lost or stolen, or involved in an accident which might cause physical damage to the source, the operator must immediately notify the RSO.

2. The RSO will immediately notify the following authority who will provide instruction and assistance in accordance with the circumstances of the incident.

Joint Nuclear Accident Coordinating Center (JNACC)
U. S. Department of Energy
Albuquerque, Nm
Phone (505) 844-4667 (24 hours a day)

New Mexico EIO/Radiation Protection Bureau
(505) 827-2275 (24 hours a day)

3. In the event or possibility of damage to the source or the source control mechanism, the operator will keep all unauthorized person(s) at least 20 feet from the guage and prevent removal of the gauge from off the site until authorized by the RSO or other appropriate authority.

4. If the gauge is lost or stolen, immediately notify the local law enforcement agency; i.e., City Police, State Police, or Sheriff's Department within whose jurisdiction the incident occurred.

5. The following Bureau of Land Management personnel have been trained in the use of the Campbell Pacific Nuclear Model No. MC-2 and Radiation Safety:

a. District Office

Jim Wagner
Frank Hager

b. Socorro Resource Area

Billy Fowler

F. Storage

When not in use, the gauge(s) will be stored in a steel metal cabinet in the warehouse.

G. Gauge Inventory

1. Physical inventory of the gauge and sealed by-products will be conducted every 6 months by the RSO as stated in the NRC Materials License.

H. Radiation Safety Officer

1. Is responsible for the District Radiation Safety Plan and shall review, update, and submit a plan each year to the District Manager and ADM, Operations for approval.

2. Will provide guidance to Bureau employees who are certified to use the gauge and ensure that all safety procedures and precautions are followed.

3. Will maintain and update all files, forms, gauge check-out system, monitor dosimetry records, issue film badges, perform leak tests, and physical inventory of gauge as required by the NRC License.

4. Ensure that all BLM employees who have a need to use the gauge have had formal training in Radiation Safety and are familiar with the District Radiation Safety Plan.

5. Provide for the security of the gauge(s).