

September 30, 1985

United States Nuclear Regulatory Commission, Region V
1450 Maria Lane, Suite 210
Walnut Creek, CA 94596

Attention Ms. Beth A. Riedlinger
Health Physicist (Licensing)
Nuclear Materials Safety Section
Docket No. 030-20394
Control No. 70238

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Dear Ms. Riedlinger,

T-175 Radioactive Level Control

In reply to your letter of September 17, 1985 requesting additional information for licensing of the T-175 Level Controller, please see the following:

1. The Level Control Vendor, General Nucleonics, will be submitting the appropriate health and safety information to the State of California.
2. Mr. Arnold Giroux and Mr. Leonard Young will be attending the instruction course for the use of the General Nucleonics unit.
3. The gauge will be secured from unauthorized use or removal at our refinery at Ewa Beach in the following ways:
 - a. The refinery is located in a Foreign Trade Zone which is under the jurisdiction of U. S. Customs. Any items leaving or entering the refinery are under the jurisdiction of U. S. Customs Agents.
 - b. The refinery has a guard on duty 24 hours a day. Any items entering or leaving the refinery must be cleared by the guard.
 - c. There will be a Shift Supervisor and operator present 24 hours a day in the Unit where the gauge is located. No one is allowed to operate or remove the gauge without the Shift Supervisors permission.
 - d. A work permit must be issued to any person wishing to work on or remove the gauge. This permit must be approved by the Shift Supervisor, Safety Inspector (Mr. Arnold Giroux), and the Assistant Process Supervisor before anyone is allowed to work on the gauge.
4. General Nucleonics Radioactive Material License Number is 1288-59 and will be submitted to you from General Nucleonics.

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In addition to the above information requested by your letter, we understand from Mr. Don Blincow of General Nucleonics that the following items required clarification:

5. Access Control: The location of the level gauge will be approximately 25 feet above grade with the only access being by ladder. A work permit approved by the Shift Supervisor, Safety Inspector, and Assistant Process Supervisor, must be obtained first by anyone entering the level gauge area. This permit will require the source to be "Locked Out" in the safe position before entry is allowed.

6. Names of People Involved: The following people will be named on the license:

Arnold Giroux, Safety & Training Supervisor
Leonard Young, Chief Chemist

The following people will also attend the training course:

Calvin Kaya, Maintenance (Instrumentation)
Mike Mullin, Operations (Shift Supervisor)
Don Huey, Operations (Shift Supervisor)
Jonathan Ogawa, Operations (Shift Supervisor)
George Pacheco, Operations (Shift Supervisor)
Tom Shepard, Operations (Shift Supervisor)
Ben Johnson, Operations (Shift Supervisor)
Mike Cante, Operations (Shift Supervisor)

7. Diagram of Installation: Please see attached drawings.
8. Personnel Dosimetry: No personnel dosimetry will be required since only 2 Mr/Hr is emitted when the source is in the "on" position.
9. Work Performed by Refinery Personnel: The refinery will provide assistance to the contractor during installation and maintenance of the source enclosure.
10. Procedures that the Refinery will Perform: We shall perform the following procedures in regards to the level gauge:
 - A. Lock source in the "safe" position whenever maintenance work is performed on the inside of the vessel or near the source. After the work is completed and the area cleared the source will be returned to the "on" position.
 - B. Check the operation of the source shutter at least every six months.

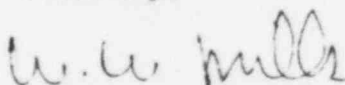
United States Nuclear Regulatory Commission
September 30, 1985
Page 3

We understand that General Nucleonics will supply information directly to you concerning the following items:

Label on Device Vessel
Users Manual
Operations Procedures
Qualifications of Trainer
Initial Installation Procedure
Radiation Procedure

As we very much need the Radioactive Level Controller, we hope that the above information will satisfy your needs in completing the review of our license application. Please feel free to contact our Mr. Michael Turina, at (808) 682-4505, about any questions that may remain unanswered.

Sincerely,



William W. Mills
Supervisor, Project Engineering

MJT:rt

Attachments

cc: Mr. Don Blincow, General Nucleonics (w/o attachments)

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