NRC FORM 699
(11-2017)

U.S. NUCLEAR REGULATORY COMMISSION

CONVERSATION RECORD

NAME OF PERSON(S)/TITLE CONTACTED OR IN CONTACT WITH YOU	DATE OF CONTACT	TYPE OF CONVERSATION
Robin E. Birk	11/20/2020	☐ E-MAIL ☑ TELEPHONE ☐ INCOMING ☑ OUTGOING
E-MAIL ADDRESS	**TELEPHONE NUMBER**	
rbirk@uss.com	412-675-2569	
ORGANIZATION	**DOCKET NUMBER(S)**	
United States Steel - Great Lakes Works	030-04891	
LICENSE NAME AND NUMBER(S)	**MAIL CONTROL NUMBER(S)**	
United States Steel - Great Lakes Works 21-10459-01	CN 623530	

SUBJECT

Conversation Record to United States Steel - Additional Information Requested

SUMMARY AND ACTION REQUIRED (IF ANY)

This is a record of the conversation between Laura Cender and Robin E. Birk of United States Steel - Great Lakes Works regarding the amendment request dated November 2, 2020. As we discussed today, please provide your response to the following items by no later than December 4, 2020.

1. Request to remove Items 6.C. - 9.C. from the license.
   - Shipping records are not sufficient for confirming transfer of licensed material. Please provide a letter from U.S. Steel Corporation - Gary Works confirming their receipt of the transfered material.

2. Request to Delete License Condition 10.A.
   - Please provide a statement confirming that specifically licensed material authorized under NRC License No. 21-10459-01 was never used, stored, or possessed at the 3000 Miller Rd, Dearborn, MI location of use.

3. Request to name new authorized users in Condition 11.
   - The training slides provided do not meet the full requirements of NUREG 1556 Vol. 4 Rev. 1 Appendix D (attached). Please provide a description of any training provided covering regulatory requirements, practical explanation, and hands-on training in the listed areas.
   - Please indicate if any of the current authorized users listed on the license need to be removed.

NAME OF PERSON DOCUMENTING CONVERSATION

Laura B. Cender

SIGNATURE	DATE OF SIGNATURE
Laura B. Cender Digitally signed by Laura B. Cender Date: 2020.11.20 09:52:37 -06'00'	11/20/2020

CRITERIA FOR ACCEPTABLE TRAINING FOR AUTHORIZED USERS AND RADIATION SAFETY OFFICERS

Course Content

Classroom training may be in the form of lectures, videos, computer-based sessions, or self-study lessons that emphasize practical subjects important to the safe use of the gauge including the following:

Radiation Safety:

- radiation versus contamination
- internal versus external exposure
- biological effects of radiation
- types and relative hazards of radioactive material possessed
- as low as is reasonably achievable (ALARA) concept
- use of time, distance, and shielding to minimize exposure
- location of sealed source within the gauge

Regulatory Requirements:

- applicable regulations
- license conditions, amendments, and renewals
- locations of use and storage of radioactive materials
- material control and accountability
- annual audit of radiation safety program
- transfer and disposal
- recordkeeping
- prior events involving fixed gauges
- handling incidents
- recognizing and ensuring that radiation warning signs are visible and legible
- licensing and inspection by regulatory agency
- need for complete and accurate information
- employee protection
- deliberate misconduct

Practical Explanation of the Theory and Operation for Each Gauge Possessed by the Licensee:

- operating, emergency, and security procedures
- routine versus nonroutine maintenance
- lock-out procedures

Supervised, Hands-On Experience (On-the-Job Training) Involving:

- operating procedures
- test runs of emergency procedures
- routine maintenance
- lock-out procedures

***Note**:* On-the-job training must be done under the supervision of an authorized user (AU) or radiation safety officer (RSO).

Training Assessment

Management will ensure that proposed AUs are qualified to work independently with each type of gauge with which they may work. Management will ensure that proposed RSOs are qualified to work independently with and are knowledgeable of the radiation safety aspects of all types of gauges that may be possessed by the applicant.

Course Instructor Qualifications

Instructors should have, at a minimum, the following:

- successful completion of a fixed gauge manufacturer's or distributor's course for users (or equivalent)
- successful completion of an 8-hour radiation safety course or RSO training course
- documentation of 8 hours of hands-on experience with fixed gauges

***Note**:* Additional training is required for those applicants intending to perform nonroutine operations, such as gauge installation; initial radiation survey; repair and maintenance of components related to the radiological safety of the gauge; gauge relocation; replacement, and disposal of sealed sources; gauge alignment; or removal of a gauge from service. See Appendix J of this NUREG, "Information Needed to Support Applicant's Request to Perform Nonroutine Operations."