



**UNITED STATES
NUCLEAR REGULATORY COMMISSION**

REGION III
2443 WARRENVILLE RD. SUITE 210
LISLE, IL 60532-4352

November 18, 2021

Bertil C. Valenkamph
Director Radiation Protection
Director Station Chemistry & Environmental Compliance
Northern Indiana Public Service Company
2755 Raystone Dr.
Valparaiso, IN 46383

Dear Mr. Valenkamph:

This letter is in reference to your request dated September 21, 2021, for an amendment to U.S. Nuclear Regulatory Commission Materials License No. 13-14984-01.

The NRC's guidance document for your proposed type of license is NUREG-1556, Volume 4, Rev. 1, dated July 2016, "Consolidated Guidance About Materials Licenses: Program - Specific Guidance About Fixed Gauge Licenses." This guidance is available on the NRC Web site at: <https://www.nrc.gov/docs/ML1618/ML16188A048.pdf>

Upon review of your letter, I identified the following areas where additional or clarifying information is needed:

1. Your request identified that you have disposed of the iron-55 and cadmium-109 radionuclides previously authorized for use in the Texas Nuclear Corporation Model 9200 Series (9266 Source Housing) X-Ray Fluorescence (XRF) Alloy Analyzer.

Submit documentation of the completed transfer/disposal of the Thermo Fisher Scientific (formerly Texas Nuclear Corporation) Model 9200 Series (9266 Source Housing) XRF Alloy Analyzer. Please provide a copy of a copy the transferee's license and a letter confirming receipt of the transferred XRF Alloy Analyzer.

2. Your request identified that Andrew Fishman, Radiation Safety Officer, retired on October 1, 2021. Your license must be amended to identify another individual to serve as the Radiation Safety Officer (RSO) as required by Title 10 Code of Federal Regulations (10 CFR) §30.33(a).

Identify who will be appointed to serve as your RSO. Identify the individual's name, contact information, and provide a delegation of authority and documentation of the radiation safety training and experience for the proposed RSO. Adequate documentation should include completion of a fixed gauge manufacturer's course for users and RSOs, with hands-on experience. An equivalent course meeting the requirements of Appendix D, "Criteria for Acceptable Training for Authorized Users and Radiation Safety Officers," is also acceptable.

3. Section 8.7.2, "Authorized Users," and Section 8.10.8, "Maintenance," of the guidance identifies that individuals responsible for performing or overseeing the performance of non-routine operations, including installation, initial radiation surveys and relocation of fixed gauging devices, must have completed specialized training for the activities to be performed or supervised.

Your request did not provide documentation of the requested Authorized User's supervised hands-on training and experience, including non-routine operations.

Submit documentation demonstrating that the proposed Authorized User has completed appropriate training and experience.

4. Your request identified that you have ceased all licensed operations at the Bailly Generating Station and have requested the site to be removed from your license.

Your request did not include documentation of the transfer/disposal of sealed sources and fixed gauging devices previously stored at that location and records demonstrating the absence of residual radioactive contamination, which are needed before the former location can be approved for release to unrestricted use.

Please provide the following information in support of your request to remove the location from your license:

- Submit records of transfer and/or disposal for all sealed sources or fixed gauging devices previously used and/or stored at the former location. If transferred outside of your organization, please provide a copy of the transferee's license and a letter confirming receipt of the transferred fixed gauging devices.
 - Submit current Leak Test Reports for all sealed sources or fixed gauging devices previously stored at the former location.
 - Describe any incidents involving ruptured, leaking or lost sealed sources or fixed gauging devices along with any other incidents involving radioactive materials at the former permanent storage location.
5. Your license currently includes an open-ended license authorization for the possession and use of multiple fixed gauging devices, including the:
- Ohmart Corporation Model HM-8 Source Housing;
 - Ohmart Corporation Model SHD Source Housing;
 - Thermo Process Instruments, LP (formerly Texas Nuclear Corporation) Model 5192 Gamma Gauge Source Housing;
 - Thermo Process Instruments, LP (formerly Texas Nuclear Corporation) Model 5197 Gamma Gauge Source Housing;
 - Thermo Process Instruments, LP (formerly Texas Nuclear Corporation) Model 5201 and 5202;
 - Ronan Engineering Company Model No. SA-8 Source Holder; and
 - Kay Ray/Sensall, Inc., Model 7062 Gamma Source Holder;
 - Kay-Ray/Sensall, Inc., Model 7062BP Gamma Source Housing; and
 - Kay-Ray/Sensall, Inc., Model 7080 Source Head.

Identify the source manufacturer and model number for the sealed sources to be authorized for use with each of these fixed gauging devices. Additionally, please specify the maximum activity per source and total activity for the fixed gauging devices that you require continuing license authorization to possess and use.

Submit documentation of the completed transfer/disposal of any of these gauge models that you no longer require continuing license authorization to possess and use. If applicable, please provide a copy of the transferee's license and a letter confirming receipt of the transferred gauging devices.

In accordance with Title 10 Code of Federal Regulations §2.390 of the NRC's "Rules of Practice," a copy of this letter will be made 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 <https://www.nrc.gov/reading-rm/adams.html>.

To continue review of your request, please submit your response within 20 calendar days from the date of this letter. In your response, please refer to the license, docket, and control number specified below. If no response is received within the specified timeframe noted above, it will be assumed that you do not wish to proceed with the requested licensing action.

If you have questions, require additional time to respond, or require clarification on any of the information stated above, you may contact me at jason.kelly@nrc.gov or (630) 829-9737.

Sincerely,

Jason M. Kelly, MPH
Health Physicist
Materials Licensing Branch

License No. 13-14984-01
Docket No. 030-08362
Control No. 628754