



Buzzi Unicem USA, 2524 South Sprigg Street, P.O. Box 520, Cape Girardeau, Missouri 63701

U.S. Nuclear Regulatory Commission
801 Warrenville Road
Lisle, IL 60532-4351
Attn: Frank Tran
(630) 829-9623

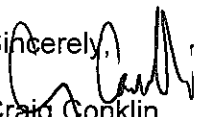
Craig Conklin
Buzzi Unicem USA
P.O.Box 520
Cape Girardeau MO. 63702-0520
(573) 335-5591 ext. 2100

Statements on Regulation and Guidance

14 December 2021

Dear Mr. Tran:

Attached are the answers to the Rules of Practice for the Buzzi Unicem plant located in Cape Girardeau Missouri. Our license number is 24-26333-01 with docket number 030-32408 and mail control number 628904.

Sincerely,

Craig Conklin
Plant Manager
Cape Girardeau Plant

12/14/21

Buzzi Unicem USA
2524 South Sprigg Street
P.O Box 520
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Phone (573) 335-5591
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Christian Matlock
Buzzi Unicem USA
2524 South Sprigg Street
Cape Girardeau MO. 63702-0520
(573) 335-5591 ext. 2105

**Statements on Regulations and
Guidance**

14 December 2021

Dear Mr. Tran:

- 1) I confirm that there have been no changes to the fixed gauges and analyzers associated with the sealed sources listed in the current license (Amendment No. 14).
- 2) Lone Star Industries, Inc. will use the licensed material in accordance with the Sealed Source and Device (SSD) Registration certificates.
- 3) Before using licensed materials, authorized users will have successfully completed one of the training courses described in the "Criteria" part of the section titled, "Authorized Users" in NUREG-1556, Volume 4, Revision 1, "Consolidated Guidance About Materials Licenses: Program-Specific Guidance About Fixed Gauge Licenses."

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- 4) Lone Star Industries, Inc. will ensure that the location of each fixed gauge meets the criteria in Section 8.9, "Facilities and Equipment," in NUREG-1556, Volume 4, Revision 1, "Consolidated Guidance About Materials Licenses: Program-Specific Guidance About Fixed Gauge Licenses."
- 5) Surveys according to 10 CFR 20.1501 will be performed by a person specifically authorized by the NRC or an Agreement State to perform these surveys.
- 6) Physical inventories will be conducted every 6 months or at other intervals approved by the NRC to account for all sealed sources and devices received and possessed under the license. We will develop, implement, and maintain procedures for ensuring accountability of licensed materials at all times.
- 7) We will maintain, for inspection by the NRC, documentation demonstrating that unmonitored individuals are not likely to receive a radiation dose in excess of the limits in 10 CFR 20.1502(a).
- 8) 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.
- 9) Leak tests will be performed at intervals approved by the NRC or an Agreement State and specified in the SSD registration certificate. Leak tests will be performed by an organization licensed by the NRC or an Agreement State to provide leak testing services to other licensees; or using a leak test sample collection kit supplied by an organization licensed by the NRC or an Agreement State to provide leak test kits and/or sample analysis services to other licensees and according to the kit supplier's instructions. Records of leak test results will be maintained.
- 10) We will implement and maintain procedures for routine maintenance of our gauges according to each manufacturer's or distributor's written recommendations and instructions. 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.
- 11) Lone Star Industries, Inc. will not use licensed material at temporary jobsites under this license.

Regards,

Christian Matlock

Christian Matlock
Electrical Superintendent
Cape Girardeau Plant

Pavon, Martha

From: Tran, Frank
Sent: Tuesday, December 14, 2021 1:36 PM
To: Pavon, Sandy; Pavon, Martha
Cc: Tomczak, Tammy
Subject: FW: FW: RE: Request for additional information for NRC License No. 24-26333-01
Attachments: Statement on regulations and Guidance.pdf; NRC 665 _ Additional information.pdf

Dear IM Center:

Please add the attachment to ADAMS as additional information for CN628940. A Form 665 was also attached. Let me know if you have any questions.

Thank you,
Frank

From: Menz, Gregory <Gregory.Menz@buzziunicemusa.com>
Sent: Tuesday, December 14, 2021 12:56 PM
To: Tran, Frank <Frank.Tran@nrc.gov>; Matlock, Christian <Christian.Matlock@buzziunicemusa.com>
Subject: [External_Sender] FW: RE: Request for additional information for NRC License No. 24-26333-01

Mr. Tran,

Here are the answers you requested from us on the Statements on Regulation and Guidance.

Thanks

Gregory Menz
Automation Technician
Buzzi Unicem USA
Cape Girardeau Mo. 63701
573-335-5591 ext. 2131

From: Tran, Frank <Frank.Tran@nrc.gov>
Sent: Tuesday, December 14, 2021 10:09 AM
To: Menz, Gregory <Gregory.Menz@buzziunicemusa.com>
Cc: Matlock, Christian <Christian.Matlock@buzziunicemusa.com>
Subject: RE: RE: Request for additional information for NRC License No. 24-26333-01

This email originated from outside the Company. DO NOT CLICK ANY LINKS or OPEN ANY ATTACHMENTS unless you trust the sender. If you are not sure please contact the IT Helpdesk before proceeding.

Mr. Menz,

We can meet at 10:30 am.

Thanks,

Frank Tran

From: Menz, Gregory <Gregory.Menz@buzziunicemusa.com>

Sent: Tuesday, December 14, 2021 9:34 AM

To: Tran, Frank <Frank.Tran@nrc.gov>

Cc: Matlock, Christian <Christian.Matlock@buzziunicemusa.com>

Subject: [External_Sender] RE: Request for additional information for NRC License No. 24-26333-01

Mr. Tran,

Christian and I have a couple of questions to ask you. Will you be available for a call around 10:30 CST.

Thanks

Gregory Menz
Automation Technician
Buzzi Unicem USA
Cape Girardeau Mo. 63701
573-335-5591 ext. 2131