

From: [Kelly, Jason](#)
To: [Heather M Lucier](#)
Subject: U.S. NRC Materials License No. 21-02335-05
Date: Friday, May 27, 2022 3:16:00 PM

Ms. Lucier:

Good morning. I have reviewed your letter dated April 20, 2022, in which you requested the following changes to your U.S. Nuclear Regulatory Commission (NRC) Materials License No. 21-02335-05:

- change your company's legal name to DTE Electric Company;
- remove Ronald James and add Heather Lucier as the Radiation Safety Officer;
- remove Russell C. Boynton and add William A. Tummonds as an Authorized User; and
- remove authorization to perform Non-Routine Operations and Maintenance of fixed gauging devices.

The accompanying Appendix B, "Suggested Format for Providing Information Requested in Items 5 through 11 of U.S. NRC Form 313," included some apparent typographical or inadvertent selections as described below:

- items 5 and 6 describe Cs-137 sealed sources for use in various Ohmart and Texas Nuclear fixed gauging devices. Though, the column selected is "No," as opposed to the expected selection of "Yes." Please select "Yes," to identify that you are requesting continuing licensed authorization for the devices described;
- Item 10.7, "Radiation Safety Program – Leak Tests," identifies that you may like to perform Leak Test Analysis under this license; however, you note that analysis will typically be performed under U.S. NRC License No. NPF-43. If you would like the authority to perform Leak Test Analysis under this license, separate from the authorization provided in NPF-43, please provide applicable descriptions of your equipment, procedures and personnel qualification for performing Leak Test Analysis in-house. You may also identify that Leak Test Analysis will be performed under U.S. NRC License No. NPF-43 or other persons specifically licensed by the U.S. NRC or an Agreement State; and
- a selection regarding the performance of Non-Routine Maintenance Operation in Item 10.8, "Radiation Safety Program – Maintenance," is not made. Your letter indicates that Non-Routine Operations and Maintenance will no longer be performed by DTE Electric Company. In this case, Non-Routine Operations and Maintenance will need to be contracted out to the Manufacturer/Distributor or another Specifically Licensed Company authorized to perform Non-Routine Operations and Maintenance. The expected selection was not checked. Please make a selection in the row concerning the performance of Non-Routine Operations and Maintenance.

Please resubmit the applicable pages of your submission with a correction to the described typographical or inadvertent selections.

Further, your license will need to continue to authorize the possession of the Texas Nuclear

Corporation Model 5181, 5180A, 5192 and 5193 fixed gauging devices until they have been transferred. Once the transfers have been completed, you may submit a request for their removal providing a record of transfer and current leak test reports reflecting that the fixed gauging devices were not leaking radioactive contamination. For clarity, I suggest adding these devices to the accompanying Items 5 and 6 of your amendment request.

You requested that William A. Tummonds be added as Authorized User in Condition 17.A. Because you are requesting that authorization for the performance of Non-Routine Operations and Maintenance be removed from the license, this condition will be restricted to limit performance of Non-Routine Operations and Maintenance to the Manufacturer/Distributor or another Specifically Licensed Company authorized to perform Non-Routine Operations and Maintenance. It is not our policy to specifically identify other Authorized Users in Condition 11. This is just in explanation of why I am unable to proceed with this portion of your request. No action on your part in this regard is needed.

Please respond within 15 days. Include a signed cover letter with your response describing the application changes and provide the corrected pages as attachments to your request. If applicable, include an update on the proposed timeline for disposition of radioactive materials identified in your letter. For routing purposes, please reference U.S. NRC Materials License No. 21-02335-05, Docket No. 030-04803 and Control No. 630777. You may submit the response to me directly via e-mail if it is convenient to do so. Though, please verify that the response was received.

Jason M Kelly, MPH
Health Physicist
Materials Licensing Branch
U.S. Nuclear Regulatory Commission
Region III
2443 Warrenville Road, Suite 210
Lisle, IL 60532-4352
Office: (630) 829-9737
Fax: (630) 515-1078



<http://www.nrc.gov/>

Pavon, Martha

From: Kelly, Jason
Sent: Monday, June 13, 2022 10:19 AM
To: Pavon, Sandy
Cc: Pavon, Martha
Subject: FW: U.S. NRC Materials License No. 21-02335-05
Attachments: U.S. NRC RAI E-mail (5-27-2022).pdf; Form 665 (RAI E-mail - 5-27-2022).pdf

Sandy,

Attached is an Request for Additional Information E-mail dated May 27, 2022 for Materials License No. 21-02335-05 (DTE Energy), Docket No. 030-04803 and Control No. 630777.

Jason M Kelly, MPH
Health Physicist
U.S. NRC Region III – DNMS MLB
Phone: (630) 829-9737
E-mail: Jason.Kelly@nrc.gov

From: Kelly, Jason
Sent: Friday, May 27, 2022 3:17 PM
To: Heather M Lucier <heather.lucier@dteenergy.com>
Subject: U.S. NRC Materials License No. 21-02335-05

Ms. Lucier:

Good morning. I have reviewed your letter dated April 20, 2022, in which you requested the following changes to your U.S. Nuclear Regulatory Commission (NRC) Materials License No. 21-02335-05:

- change your company’s legal name to DTE Electric Company;
- remove Ronald James and add Heather Lucier as the Radiation Safety Officer;
- remove Russell C. Boynton and add William A. Tummonds as an Authorized User; and
- remove authorization to perform Non-Routine Operations and Maintenance of fixed gauging devices.

The accompanying Appendix B, “Suggested Format for Providing Information Requested in Items 5 through 11 of U.S. NRC Form 313,” included some apparent typographical or inadvertent selections as described below:

- items 5 and 6 describe Cs-137 sealed sources for use in various Ohmart and Texas Nuclear fixed gauging devices. Though, the column selected is “No,” as opposed to the expected selection of “Yes.” Please select “Yes,” to identify that you are requesting continuing licensed authorization for the devices described;
- Item 10.7, “Radiation Safety Program – Leak Tests,” identifies that you may like to perform Leak Test Analysis under this license; however, you note that analysis will typically be performed under U.S. NRC License No. NPF-43. If you would like the authority to perform Leak Test Analysis under this license, separate from the authorization provided in NPF-43, please provide applicable descriptions of your equipment, procedures and personnel qualification for performing Leak Test Analysis in-house. You may also identify that Leak Test Analysis will be performed under U.S. NRC License No. NPF-43 or other persons specifically licensed by the U.S. NRC or an Agreement State; and

- a selection regarding the performance of Non-Routine Maintenance Operation in Item 10.8, “Radiation Safety Program – Maintenance,” is not made. Your letter indicates that Non-Routine Operations and Maintenance will no longer be performed by DTE Electric Company. In this case, Non-Routine Operations and Maintenance will need to be contracted out to the Manufacturer/Distributor or another Specifically Licensed Company authorized to perform Non-Routine Operations and Maintenance. The expected selection was not checked. Please make a selection in the row concerning the performance of Non-Routine Operations and Maintenance.

Please resubmit the applicable pages of your submission with a correction to the described typographical or inadvertent selections.

Further, your license will need to continue to authorize the possession of the Texas Nuclear Corporation Model 5181, 5180A, 5192 and 5193 fixed gauging devices until they have been transferred. Once the transfers have been completed, you may submit a request for their removal providing a record of transfer and current leak test reports reflecting that the fixed gauging devices were not leaking radioactive contamination. For clarity, I suggest adding these devices to the accompanying Items 5 and 6 of your amendment request.

You requested that William A. Tummonds be added as Authorized User in Condition 17.A. Because you are requesting that authorization for the performance of Non-Routine Operations and Maintenance be removed from the license, this condition will be restricted to limit performance of Non-Routine Operations and Maintenance to the Manufacturer/Distributor or another Specifically Licensed Company authorized to perform Non-Routine Operations and Maintenance. It is not our policy to specifically identify other Authorized Users in Condition 11. This is just in explanation of why I am unable to proceed with this portion of your request. No action on your part in this regard is needed.

Please respond within 15 days. Include a signed cover letter with your response describing the application changes and provide the corrected pages as attachments to your request. If applicable, include an update on the proposed timeline for disposition of radioactive materials identified in your letter. For routing purposes, please reference U.S. NRC Materials License No. 21-02335-05, Docket No. 030-04803 and Control No. 630777. You may submit the response to me directly via e-mail if it is convenient to do so. Though, please verify that the response was received.

Jason M Kelly, MPH
Health Physicist
Materials Licensing Branch
U.S. Nuclear Regulatory Commission
Region III
2443 Warrenville Road, Suite 210
Lisle, IL 60532-4352
Office: (630) 829-9737
Fax: (630) 515-1078



<http://www.nrc.gov/>