



DTE Electric Company – Fermi 2
6400 N. Dixie Hwy.
Newport, MI 48166

June 15, 2022

Materials Licensing Branch
U.S Nuclear Regulatory Commission, Region III
2443 Warrenville Road, Suite 210
Lisle, Illinois 60532-4352

Subject: Request for Additional Information for Materials License 21-02335-06 (Docket No. 030-04804, Control No. 630731) Amendment

Please find enclosed the applicable pages of Appendix B, “Suggested Format for Providing Information Requested in Items 5 through 11 of U.S. NRC Form 313.” Below is a summary of the application changes:

- Page B-1 has been resubmitted to address items 5 and 6. There was a typo in the original submitted with the application. In the second row, the device manufacturer and model number has been edited to TN Technologies 5200 and 5205. The activity per source has also been edited to two gauges with 200 mCi sources in each gauge.
- Page B-5 has also been resubmitted with the expected selection marked for item 10.7, Radiation Safety Program – Leak Tests. We wish to proceed with the amendment without modifying the current license authorization in Condition 13F of U.S. NRC License No. 21-02335-06.

If there are any questions, or if additional information is required, please contact me at (734)586-5301 or heather.lucier@dteenergy.com.

Sincerely,

A handwritten signature in black ink, appearing to read "Heather Lucier". The signature is fluid and cursive, written over a light blue horizontal line.

Heather Lucier
Senior Engineer & Corporate RSO

Enclosures
Enclosure 1 – Applicable Pages of Appendix B

**SUGGESTED FORMAT FOR PROVIDING INFORMATION REQUESTED IN
 ITEMS 5 THROUGH 11 OF
 U.S. NUCLEAR REGULATORY COMMISSION FORM 313**

Items 5 and 6: Materials To Be Possessed and Proposed Uses

Yes	No	Radionuclide	Manufacturer or Distributor Model No.	Quantity	Use as Listed on SSD Registration Certificate	Specify Other Uses Not Listed on SSD Registration Certificate
		Isotope (Specify):	Device manufacturer (or distributor) and model number:	Specify activity per source and number of gauges requested.	Yes <input type="checkbox"/> Specific description of the gauge use:	<input type="checkbox"/> Not applicable <input type="checkbox"/> Uses are: _____ (Submit safety analysis supporting safe use)
		Isotope (Specify):	Device manufacturer (or distributor) and model number:	Specify activity per source and number of gauges requested.	Yes <input type="checkbox"/> Specific description of the gauge use:	<input type="checkbox"/> Not applicable <input type="checkbox"/> Uses are: _____ (Submit safety analysis supporting safe use)
		Isotope (Specify):	Device manufacturer (or distributor) and model number:	Specify activity per source and number of gauges requested.	Yes <input type="checkbox"/> Specific description of the gauge use:	<input type="checkbox"/> Not applicable <input type="checkbox"/> Uses are: _____ (Submit safety analysis supporting safe use)
Is financial assurance required? If yes, submit evidence of financial assurance.						

NOTE: Copy and attach additional pages as needed.

Item No. and Title	Suggested Response	Yes	Alternative Procedures Attached
10.7 Radiation Safety Program – Leak Tests	<p>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.</p> <p style="text-align: center;">OR</p> <p>We will implement the model leak test program in Appendix I of NUREG-1556, Volume 4, Revision 1, "Consolidated Guidance About Materials Licenses: Program-Specific Guidance About Fixed Gauge Licenses." Records of leak tests will be maintained.</p>	<input type="checkbox"/> <input type="checkbox"/>	<input type="checkbox"/> For this item, checking this box indicates that alternative equipment and/or procedures will be provided as part of the application and that records of leak tests will be maintained.
10.8 Radiation Safety Program – Maintenance	<p><u>ROUTINE MAINTENANCE</u> We will implement and maintain procedures for routine maintenance of our gauges according to each manufacturer's or distributor's written recommendations and instructions.</p> <p><u>NONROUTINE MAINTENANCE OPERATIONS</u> 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.</p>	<input type="checkbox"/> <input type="checkbox"/>	<input type="checkbox"/> <input type="checkbox"/> The information listed in Appendix J of this NUREG, "Information Needed to Support Applicant's Request to Perform Nonroutine Operations," is attached.
10.9 Radiation Safety Program – Transportation	The applicant is <i>not</i> required to submit a response about transportation during the licensing process. The NRC will review this issue during inspection.	Need not be submitted with application.	

From: [Kelly, Jason](#)
To: [Pavon, Sandy](#)
Cc: [Pavon, Martha](#)
Subject: FW: RE: U.S. NRC Materials License 21-02335-06
Date: Thursday, June 16, 2022 11:49:39 AM
Attachments: [trenton amendment rev 2.pdf](#)
[Form 665 \(Additional Information - 6-15-2022\).pdf](#)

Sandy,

Attached is an incoming response providing Additional Information for Materials License 21-02335-06 (DTE Energy), Docket No. 030-04804 and Control No. 630731.

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

From: Heather M Lucier <heather.lucier@dteenergy.com>
Sent: Wednesday, June 15, 2022 3:01 PM
To: Kelly, Jason <Jason.Kelly@nrc.gov>
Subject: [External_Sender] RE: U.S. NRC Materials License 21-02335-06

Mr. Kelly:

Attached is a signed cover letter detailing the changes to the application.

I have a question about the other license amendments for DTE Electric Company has currently in progress. I believe I have filled out all of the forms the same in regards to Item 10.7 of Appendix B, Radiation Safety Program – Leak Tests. I did not see an email similar to the one for License No. 21-02335-06 regarding the leak tests and would like to verify that for U.S. NRC Materials License No. 21-02335-12, Docket No. 030-18047 and Control No. 630774; U.S. NRC Materials License No. 21-02335-05, Docket No. 030-04803 and Control No. 630777; and U.S. NRC Materials License No. 21-32707-01, Docket No. 030-37798 and Control No. 630775 the filed amendments will not modify the current license condition 13F of the three aforementioned licenses?

Thank you,
Heather Lucier
DTE Energy – Fermi 2 | Senior Engineer and Corporate RSO
[Office] 734.586.5301
[Cell] 313.605.1612

From: Kelly, Jason <Jason.Kelly@nrc.gov>
Sent: Monday, June 13, 2022 12:58 PM
To: Heather M Lucier <heather.lucier@dteenergy.com>
Subject: [EXTERNAL] U.S. NRC Materials License 21-02335-06

Ms. Lucier:

I am reviewing the request to amend U.S. NRC Materials License No. 21-02335-06 in accordance with your application dated April 14, 2022 and letter dated June 9, 2022.

As I was drafting the license amendment this morning, I identified that this license previously authorized TN Technologies, Inc., Model 5200 and 5205 fixed gauging devices. Please clarify the status of these licensed devices. As applicable, submit records of transfer/disposal along with the most recent Leak Test Reports as evidence that the devices were not leaking residual radioactive contamination at the time the fixed gauging devices were transferred / disposed.

Further, your statements in the cover letter identify that you are not seeking to perform Leak Testing under this license, but leak testing will be performed by persons specifically licensed by the U.S. NRC or an Agreement State to perform such services. Your request identifies that DTE Electric Company is so authorized under U.S. NRC License No. NPF-43. The expected response in the accompanying Appendix B was not selected. The response selected identifies that you intend to perform Leak Testing and Analysis under U.S. NRC License No. 21-02335-06 and will abide by the Model Leak Test Program in Appendix I of NUREG-1556, Volume 4, Rev. 1. If you wish to perform Leak Testing under U.S. NRC License No. 21-02335-06, please also include a description of available analysis equipment and the training and qualification program for personnel responsible for performing Leak Testing and Analysis. Otherwise, I will proceed with the license amendment without modifying the current license authorization in Condition 13.F. of U.S. NRC License No. 21-02335-06, which restricts leak testing and analysis to be performed by DTE Electric Company under NPF-43 or other persons specifically licensed by the U.S. NRC or an Agreement State.

Please respond within 15 days. Include a signed cover letter with your response. For routing purposes, please reference U.S. NRC Materials License No. 21-02335-06, Docket No. 030-04804 and Control No. 630731. 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
U.S. NRC Region III – DNMS MLB
Phone: (630) 829-9737
E-mail: Jason.Kelly@nrc.gov