



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION I
475 ALLENDALE ROAD – SUITE 102
KING OF PRUSSIA, PA 19406-1415

June 23, 2022

Derek Scantlin, Vice-President and
Chief Financial Officer
Constellium Rolled Products
P. O. Box 68
Ravenswood, WV 26264

SUBJECT: CONSTELLIUM ROLLED PRODUCTS, REQUEST FOR ADDITIONAL
INFORMATION, MAIL CONTROL NO. 630833

Dear Mr. Scantlin:

This is in reference to your application dated April 5, 2022, requesting to renew NRC License No. 47-14123-01. In order to continue our review, we need the following additional information:

1. The current license lists the company name as "Constellium Rolled Products Ravenswood, LLC" but the application listed "Constellium Rolled Products." Please confirm the correct name which should be listed on the license.
2. The current license authorizes both strontium-90 (Sr-90) as well as americium-241 (Am-241), however the application requested only Am-241. Confirm if you wish to have the authorization for Sr-90 sources removed from the license. If so, please confirm that all gauges containing Sr-90 sources previously possessed were transferred or disposed of. If possible, copies of documentation of the transfer or disposal should be provided.
3. The current license authorizes a quantity of Am-241 sufficient for 6 gauges. The application did not specify the total quantity for all gauges, only the activity per gauge. Please note that the activity you listed is less than the maximum activity that could be in a single gauge. Please confirm the number of gauges which should be authorized on the license. Please confirm if the maximum activity per gauge should be increased to the amount authorized on the gauge registration certificate.
4. The current license authorized the use of the sources in the following gauges: ABB inc. Model TG-2; IMS Measuring Systems Inc. Model 5221-series; SenTek Corporation Model TX-1, Data Measurement Corporation Model SR-U2, and Lockheed Martin Tactical Systems Division Model 5310 series. Please state which fixed gauge models which should be authorized on the renewed license.
5. You proposed Jeffrey Scott Chinn as the new Radiation Safety Officer and stated that his Certificate of Radiological Training was attached. However, that document is missing from the application. Please provide a certificate of completion of an RSO's course and/or an authorized user's course.

6. Sections 3.2 and 5.2 of your Radiation Safety Program state that User training is provided "...as specified by the NRC..." The current guidance is found in NUREG-1556, "Consolidated Guidance About Materials Licenses," Volume 4, Revision 1, "Program-Specific Guidance about Fixed Gauge Licenses." (NUREG 1556 Vol. 4, Rev. 1 <https://www.nrc.gov/reading-rm/doc-collections/nuregs/staff/sr1556/v4/index.html>). Please review Section 8.7.2 "Authorized Users" and Appendix D "Criteria for Acceptable Training for Authorized users and Radiation Safety Officers". The minimum training is successful completion of a fixed gauge manufacturer's course for users, or an equivalent course that meets the criteria in Appendix D. The training described in the Radiation Safety Program does not appear to cover much of the Appendix D criteria. Please provide additional information which demonstrates that the training includes the areas described in Appendix D, including both classroom and hands-on training.
7. In accordance with NUREG 1556, Vol. 4, Rev.1, Section 8.10.2, confirm that you will use radiation survey instruments that meet the criteria in Section 8.10.2 of NUREG-1556, Vol. 4, Rev. 1.
8. Section 5.1 of your Radiation Safety Program does not specify who analyzes the leak tests of your gauges. Your current license authorizes you to perform your own analysis. If you wish to continue to be authorized to analyze your own leak tests, confirm that you will implement the model leak test program in Appendix I of NUREG 1556, Vol. 4, Rev. 1.

We will continue our review upon receipt of this information. Please reply to my attention at using a pdf of a signed letter, sent by electronic mail to

R1DRSSMail.Resource@nrc.gov

Reference – Betsy Ullrich

Mail Control No. 630833

In order to continue prompt review of your application, we request that you submit your response to this letter within 30 calendar days from the date of this letter.

An electronic version of the NRC's regulations is available on the NRC Web Site at: www.nrc.gov. Additional information regarding use of radioactive materials may be obtained on the NRC Web Site at: <http://www.nrc.gov/materials/miau/mat-toolkits.html>. This site also provides the link to the toolbox for updated information on the revised regulations for naturally-occurring and accelerator-produced radioactive materials (NARM).

In accordance with 10 CFR 2.390 of the NRC's "Agency Rules of Practice and Procedure," a copy of this letter will be available electronically for public inspection in the NRC Public Document Room or from the NRC's document system (ADAMS). ADAMS is accessible from the NRC Web Site at: <http://www.nrc.gov/reading-rm/adams.html>. Please be aware that you may request that certain portions of your submittal to NRC be withheld from public disclosure as proprietary information. To do this, you must execute an affidavit as specified in 10 CFR 2.390. You must list all portions that you wish to be held proprietary, along with your reasoning as to why that is appropriate. While it is allowable, please refrain from submitting proprietary information in support of a license unless necessary. Keep in mind that all NRC licenses are considered to be in the public domain, and therefore may be viewed by any member of the public who requests to see them.

If you have any questions regarding this request for additional information, please contact me at 240-704-4575 (cell) or by electronic mail to Elizabeth.Ullrich@nrc.gov .

Thank you for your cooperation.

Sincerely,

Betsy Ullrich, Senior Health Physicist
Commercial, Industrial, R&D
and Academic Branch
Division of Radiological Safety and Security
Region I

License No. 47-14123-01
Docket No. 030-07657
Mail Control No. 630833

cc: Zachary Bennett, Radiation Safety Officer
Jeffrey Scott Chinn, proposed Radiation Safety Officer

CONSTELLIUM ROLLED PRODUCTS, REQUEST FOR ADDITIONAL INFORMATION, MAIL
CONTROL NO. 630833 DATED JUNE 23, 2022

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SUNSI Review Complete: Betsy Ullrich

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NAME	Betsy Ullrich						
DATE	6/23/22						

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