

From: [Ullrich, Betsy](#)
To: [Christopher Hessler](#)
Cc: daniel.mussap@gerdau.com; [Casey, Colleen](#)
Subject: NRC license renewal
Date: Friday, September 9, 2022 7:52:00 AM

Mr. Hessler,

Colleen agreed that I would complete this action, and provided me with your letter dated April 29, 2022. I very much appreciate the level of detail in your response. I have one item that requires clarification of Item 10.8, because our checklist form is not always clear. Here is a 'snip' from the checklist you submitted, which shows that the box committing to routine maintenance was not checked; the box stating that non-routine maintenance would be performed by authorized persons is checked; and the box stating that non-routine maintenance procedures to be performed would be described in an attachment which address the Appendix J criteria is not checked. (As I said, the checklist is not always clear).

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| 10.8 Radiation Safety Program – Maintenance | <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. <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. | <input type="checkbox"/> <input checked="" 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. |
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1. Based on your statements in the letter and the attachment with the list of tasks, please confirm my understanding that you will implement and maintain procedures for routine maintenance of your gauges according to the manufacturer's written recommendations and instructions; and
2. Based on your statements in the letter and the attachment dated May 2, 2022, confirm that Andrew Hansen will perform the non-routine maintenance described in the May 2, 2022 letter (transfer of the sealed source between dip tubes) and provide the procedure from Berthold that you stated you would follow. In reviewing a Berthold manual for the mold level shield, I do not see a procedure for the transfer of the source from one dip tube to another, although the procedure for replacement of a source is in the manual and indicates that replacement is a non-routine activity. It may be that you have a more specific or different manual than the one that I was able to locate from the Berthold web site.

Thank you very much for your patience in this renewal process. I will continue the review after receiving the additional information.

Betsy

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