



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

November 9, 2022

John Kovaleski, Plant Manager
DuPont Polymer Products, LLC
8480 DuPont Road, B200
Washington, WV 26181

**SUBJECT: DUPONT POLYMER PRODUCTS, LLC, REQUEST FOR ADDITIONAL
INFORMATION FOR NEW LICENSE APPLICATION, MAIL CONTROL 633416**

Dear Mr. Kovaleski:

This is in reference to the application for a new license dated August 24, 2022, informing us of a change in control of part of your licensed activities authorized by NRC License No. 47-01876-01. In order to continue our review, we need the following additional information:

1. The letter addressing the change of control was signed by the Radiation Safety Officer, and the application for the new license was signed by the Plant Manager. When submitting future license amendments, please have the document signed by a management representative rather than the Radiation Safety Officer. The NRC views a letter signed by a management representative as indication that management has reviewed the application and concurs in the statements and representations contained therein. The response to this letter should be signed by a management representative for the new licensee.
2. Confirm if the spelling of the name should be "DuPont" or "Dupont". It is spelled differently in the letter than in the application.
3. The address on the application for a license for Dupont Polymer Products, LLC is the same as the address on the current license for DuPont Specialty Products USA, LLC. If the address will remain the same, explain which facilities each licensee is responsible for oversight under the different licenses. Describe how control of the facilities will be maintained so that it is clear under which license activities are occurring.
4. Both Herbert Whitlatch and Casey Green are listed as authorized users to be named on the license, and as performing non-routine maintenance. However, there is no documentation of training For Casey Green to perform non-routine maintenance. Please provide such documentation, or confirm that he will not be authorized to perform non-routine maintenance at this time.
5. Confirm that you understand that all other persons, such as area monitors, are working under the supervision of one of the authorized users named on the license.

6. In accordance with NUREG-1556, "Consolidated Guidance About Materials Licenses," volume 4, "Program-Specific Guidance About Fixed Gauge Licenses," Revision 1, May 2016 (1556, Vol. 4, Rev. 1), Section 8.9, state "We will ensure that the location of each fixed gauge meets the criteria in Section 8.9 of 1556. Vol. 4., Rev. 1"
7. Section 8.10.3 of 1556, Vol. 4, Rev. 1 requires that physical inventory be performed every 6 months. Section 9.5 of your Procedure 503 does not specify inventory frequency; however, this requirement is a standard license condition that will be listed on your new license. Confirm that you understand that physical inventory of NRC materials is required every 6 months.
8. In your procedure 503, several sections refer to the use of film badges. The use of film badges is not common anymore, having been replaced by thermoluminescent dosimeters (TLD), optically-stimulated dosimeters (OSL), and other recent technology. Confirm if you are using film badges; alternately, confirm that wherever Procedure 503 refers to "film badges" you are referring to personnel dosimeters that meet the requirements for monitoring in 10 CFR Part 20.
9. Section 9.7 of Procedures 503 states that you will install and move sources. Although this section includes some of the information requested by 1556, Vol. 4, Rev. 1, Appendix J, for the nonroutine maintenance you plan to perform, please provide the following additional information:
 - a. Provide the procedure for installing sources and the procedure for moving sources. If removal of sources also is involved, the procedure(s) should include that activity.
 - b. Confirm that extremity dosimeters will be worn by individuals performing nonroutine activities, or perform a prospective evaluation to determine if extremity dosimeters are not required.

We will continue our review upon receipt of this information. A pdf copy of a signed response may be provided by electronic mail to Elizabeth.Ullrich@nrc.gov. If you prefer to provide a hard copy response by regular mail, please send that to my attention at:

Betsy Ullrich
Mail Control Nos. 633416
USNRC, Region I
Division of Radiological Safety and Security
475 Allendale Road – Suite 102
King of Prussia, PA 19406

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 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. 47-01876-02
Docket No. 030-39323
Mail Control No. 633416

cc: Herbert Whitlatch, Radiation Safety Officer
Josh Ankrom, Environmental, Health & Safety Manager

DUPONT SPECIALTY PRODUCTS USA, LLC, REQUEST FOR NEW LICENSE APPLICATION, MAIL CONTROL 633416 DATED NOVEMBER 9, 2022

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SUNSI Review Complete: Betsy Ullrich

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