



16 Jan 2024

From: Weeks Marine, Inc. (WMI)

To: Licensing Assistance Team
Division of Nuclear Materials Safety
U.S. Nuclear Regulatory Commission, Region 1
2100 Renaissance Blvd., Suite 100
King of Prussia, PA 19406-2713
Attn: Mr. Juan Ayala

Subject: License No. 29-35705-01

Dear Mr. Ayala:

WMI requests the U.S. Nuclear Regulatory Commission issue a license amendment as follows:

- Add authorization to allow Weeks Marine trained personnel to conduct limited non-routine maintenance to include gauge removal, installation, relocation, and initial surveys

Also, request confirmation of WMI's interpretation of License Conditions (LC) 17 and 19. Specifically:
LC 17:

- WMI is authorized to train and issue certificates to persons performing non-routine maintenance (i.e. WMI designated AU's (Authorized Users); provided training is performed by a qualified, Radiation Safety Officer (Steve Brunswick; WMI's RSO, Bryan Rolig; WMI's Radiation Administrator).
- Designated AU's can temporarily remove/reinstall Radiation sources after completion of activities.

LC 19:

- Designated AU's are specifically licensed to perform all activities noted in Condition 19; including "....install and made operational".

The following pages/emails provide additional details.

Due to electronic transfer difficulties resulting from the size of the files I've included hard-copies of WMI's AU Training, Tests, and other files related to WMI's Radiation program & non-routine maintenance.

If you have any questions, please contact:

Bryan Rolig: 985-875-2589 (O), 985-630-0351 (C), bsrolig@weeksmarine.com, or

Steve Brunswick (RSO): 908-402-8030(O), 908-242-7136 (C), slbrunswick@weeksmarine.com

Kind regards,

Bryan Rolig
Regulatory Compliance Specialist



From: Bryan S. Rolig <BSRolig@WeeksMarine.Com>
Sent: Friday, October 20, 2023 2:58 PM
To: juan.ayala@nrc.gov
Cc: Steve L. Brunswick <SLBrunswick@WeeksMarine.Com>; Bryan S. Rolig <BSRolig@WeeksMarine.Com>; RSO <RSO@WeeksMarine.Com>
Subject: 231020 Questions - Weeks Marine-NRC License: 29-35705-01

Juan,
I just left you a voicemail and following up with an email.
Can you provide an update to the request below?

Please call me at 985-630-0351 if you have questions.

Thank you!

Bryan Rolig
Regulatory Compliance
Weeks Marine, Inc.

304 Gaille Drive
Covington, LA 70433
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Mobile: 985-630-0351
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From: Bryan S. Rolig <BSRolig@WeeksMarine.Com>
Sent: Monday, July 10, 2023 5:15 PM
To: juan.ayala@nrc.gov
Cc: Steve L. Brunswick <SLBrunswick@WeeksMarine.Com>; Bryan S. Rolig <BSRolig@WeeksMarine.Com>; Charles B. Cobb <CBCobb@WeeksMarine.Com>
Subject: 230710 Questions - Weeks Marine-NRC License: 29-35705-01

Juan,

On 7/5/2023 you were sent two emails with (3) additional documents related to source removal/reinstallation (source unbolting/bolting, Lockout Tagout, and Radiation Users and Authorized List). On 7/7/2023, Weeks Marine (WMI) received license 29-35705-01 (attached). WMI has reviewed the license and wants to confirm our understanding of the license conditions.

Excerpt of License Condition 17.

“The following services **shall not be performed by the licensee: (i) relocation** (ii) dismantling, (iii) **replacement**, (iv) disposal of the sealed source, and (v) non-routine maintenance or repair of components related to the radiological safety of the gauge (i.e., the sealed source, the source holder, source drive mechanism, on-off mechanism (shutter), shutter control, shielding). These services shall be performed only by persons specifically licensed by the U.S. Nuclear Regulatory Commission or an Agreement State to perform such services.”

WMI background information:

WMI current procedures allow the use of “AUTHORIZED USERS (AU’s)” to remove Radiation source shields from dredge pipes to perform vessel maintenance and/or repairs.

The AU’s move the Source shields to vessel secured areas (with two (2) independent physical controls) and perform radiation surveys for the new temporary area.

At completion of maintenance/repair activities, the AU’s reinstall the sources onto the dredge pipes and survey the area.

The AU’s are trained by WMI’s RSO or by Applied Health Physics (our Radiation Consultant), to the requirements of NUREG 1556, Volume 4, Revision 1, Appendix D & J, and 49 CFR 172.704 (A) (1) – (A)(4); certificated of completion are maintained by WMI.

Request confirmation of:

- 1) **Steve Brunswick (WMI’s RSO) can train WMI’s designated AU’s.**
- 2) **WMI’s designated AU’s can temporarily remove and reinstall Radiation sources after completion of activities.**

Excerpt of License Condition 19.

“19. The licensee may initially mount a gauge, if permitted by the certificate of registration issued by the U.S. Nuclear Regulatory Commission or an Agreement State, and under the following conditions:

A. The gauge must be mounted in accordance with written instructions provided by the manufacturer.

B. The gauge must be mounted in a location compatible with the Conditions of Normal Use and Limitations and/or Other Considerations of Use in the certificate of registration issued by the U.S. Nuclear Regulatory Commission or an Agreement State.

C. The on-off mechanism (shutter) must be locked in the off position, if applicable, or the source must be otherwise fully shielded.

D. The gauge must be received in good conditions (e.g., the package was not damaged).

E. The gauge must not require any modification to fit in the proposed location.

Mounting does not include electrical connection, activation, or operation of the gauge. The source must remain fully shielded, and the gauge may not be used until it is installed and made operational by a person specifically licensed by the U.S. Nuclear Regulatory Commission or an Agreement State to perform such operations.

Request confirmation of:

WMI's designated AU's are specifically licensed to perform all activities noted in Condition 19; including "...install and made operational".

Please advise.

Thanks!

Bryan Rolig
Regulatory Compliance
Weeks Marine, Inc.

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