

Grayling OSB • 4111 West Four Mile Rd • Grayling, MI, 497387

February 14, 2024

Jason Kelly,
Health Physicist
Materials Licensing Branch
U.S. Nuclear Regulatory Commission, Region III
2443 Lisle, IL 60532-4362

Dear Jason,

Please find the additional information you requested for Weyerhaeuser's Grayling material license 21-20351-01 renewal application submitted on January 15, 2024.

Additional Information Requested for Application for Materials License, Appendix B
Items 7.1 and 10.3 NRC Form 313:

Item No. and Title	Response	Yes	Alternative Procedures Attached
7. Individual(s) Responsible For Radiation Safety Program And Their Training And Experience 7.1 Radiation Safety Officer Name: <u>Timothy Tadlock</u>	<p>RSO has successfully completed the RSO training described in Criteria in the section entitled 'Radiation Safety Officer' in NUREG-1556, Vol. 4.</p> <p>Before being named as the RSO, future RSOs will have successfully completed the training described in Criteria in the section entitled 'Radiation Safety Officer' in NUREG-1556, Vol. 4. Within 30 days of naming a new RSO, we will submit the new RSO's name to NRC to include in our license.</p> <p>Before being named as the RSO, future RSOs will sign a Delegation of Authority acknowledging acceptance of responsibility ensuring the safe use of radiation onsite.</p>	✓	
10.3 Radiation Safety Program – Material Receipt and Accountability	<p>Physical inventories will be conducted every 6 months or at other intervals approved by the NRC to account for all sealed sources and devices received and possessed under the license.</p> <p>We will develop, implement, and maintain procedures for ensuring accountability of licensed materials at all times.</p>	✓	

If you need additional information, please reach out to Tim Tadlock (RSO) at 989-348-3411 or Timothy.Tadlock@weyerhaeuser.com.

Thank you,

A handwritten signature in blue ink, appearing to read "B. Milligan", with a stylized flourish at the end.

Bruce Milligan
Plant Manager

Attachments: Weyerhaeuser Submittal Information Items 5 through 11 (revision 2-14-24)
Delegation of Authority (Tim Tadlock)

Weyerhaeuser Grayling OSB • 4111 W. 4 Mile Rd • Grayling, MI 49738

TO: Tim Tadlock, Radiation Safety Office (RSO)

FROM: Bruce Milligan, Mill Manager

SUBJECT: Delegation of Authority

You, Tim Tadlock, have been appointed radiation safety officer and are responsible for ensuring the safe use of radiation. You are responsible for managing the Radiation Protection Program; identifying radiation protection problems; initiating, recommending, or providing corrective actions; verifying implementation of corrective actions; stopping unsafe activities; and ensuring compliance with regulations. You are hereby delegated the authority necessary to meet those responsibilities, including prohibiting the use of byproduct material by employees who do not meet the necessary requirements and shutting down operations, when justified, to maintain radiation safety. You are required to notify management if staff does not cooperate and does not address radiation safety issues. In addition, you are free to raise issues with the U.S. Nuclear Regulatory Commission at any time. It is estimated that you will spend 1 hour per month conducting radiation protection activities.



Bruce Milligan, Mill Manager

2/14/2024
Date

I accept the above responsibilities,



Tim Tadlock, Radiation Safety Officer

2/14/2024
Date

Cc: Weyerhaeuser Grayling Leadership Team, REM Tom Hudson

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Tim Tadlock, RSO
989-348-3411 Office
870-584-9520 Mobile
Timothy.tadlock@weyerhaeuser.com

NRC Form 313: Application for Materials License Submittal Items 5 Through 11

Items 5 and 6: Materials to Be Possessed and Proposed Users

Radioisotope	Manufacturer or Distributor Model No.	Quantity	Use as Listed on SSD Certificate	Specify Other Uses Not Listed on SSD Certificate
Americium-241	Sealed source manufacturer or distributor and model number: LFE Corporation - Thermal Fisher Model No. SU-S3	1	The fixed gauge(s) will be used for the purposes described on the SSD Registration Certificate	NA

Items 7 through 11: Training and Experience, Facilities and Equipment, Radiation Safety Program, and Waste Disposal

Item No. and Title	Response	Yes	Alternative Procedures Attached
7. Individual(s) Responsible For Radiation Safety Program And Their Training And Experience 7.1 Radiation Safety Officer Name: <u>Timothy Tadlock</u>	RSO has successfully completed the RSO training described in Criteria in the section entitled 'Radiation Safety Officer' in NUREG-1556, Vol. 4. Before being named as the RSO, future RSOs will have successfully completed the training described in Criteria in the section entitled 'Radiation Safety Officer' in NUREG-1556, Vol. 4. Within 30 days of naming a new RSO, we will submit the new RSO's name to NRC to include in our license. Before being named as the RSO, future RSOs will sign a Delegation of Authority acknowledging acceptance of responsibility ensuring the safe use of radiation onsite.	RSO training certifies are included with this application.	

Item No. and Title	Response	Yes	Alternative Procedures Attached
7. Individual(s) Responsible For Radiation Safety Program And Their Training And Experience 7.2 Authorized Users	Before using licensed materials, authorized users will have successfully completed one of the training courses described in the "Criteria" part of the section titled, "Authorized Users" in NUREG-1556, Volume 4, Revision 1, "Consolidated Guidance About Materials Licenses: Program-Specific Guidance About Fixed Gauge Licenses."	✓	
8. Training for Individuals Who in the Course of Employment are Likely to Receive Occupational Doses of Radiation in Excess of 1 mSv (100 mrem) in a Year	Not required for submittal in license application.	Need not be submitted with application.	
9. Facilities and Equipment	We will ensure that the location of each fixed gauge meets the criteria in Section 8.9, "Facilities and Equipment," in NUREG-1556, Volume 4, Revision 1, "Consolidated Guidance About Materials Licenses: Program-Specific Guidance About Fixed Gauge Licenses."	✓	
10.1 Radiation Safety Program – Audit Program	We audit the Radiation Safety Program once per calendar year. Documented audit information available for inspection.	Need not be submitted with application.	
10.2 Radiation Safety Program – Radiation Monitoring Instruments	We will use instruments that meet the criteria in Section 8.10.2, "Radiation Monitoring Instruments," in NUREG-1556, Volume 4, Revision 1, "Consolidated Guidance About Materials Licenses: Program-Specific Guidance About Fixed Gauge Licenses". Each radiation survey meter will be calibrated by the manufacturer or other person authorized by the NRC or an Agreement State to perform radiation survey meter calibrations.	✓	
10.3 Radiation Safety Program – Material Receipt and Accountability	Physical inventories will be conducted every 6 months or at other intervals approved by the NRC to account for all sealed sources and devices received and possessed under the license. We will develop, implement, and maintain procedures for ensuring accountability of licensed materials at all times.	✓	
10.4 Radiation Safety Program – Occupational Dose	We will maintain, for inspection by the NRC, documentation demonstrating that unmonitored individuals are not likely to receive a radiation dose in excess of the limits in 10 CFR 20.1502(a).	✓	
10.5 Radiation Safety Program – Public Dose	Not required for submittal in license application.	Need not be submitted with application.	

Item No. and Title	Response	Yes	Alternative Procedures Attached
10.6 Radiation Safety Program – Operating, Emergency, and Security Procedures.	Operating, emergency, and security procedures will be developed, implemented, maintained, and distributed and will meet the criteria in Section 8.10.6, "Operating, Emergency, and Security Procedures," in NUREG-1556, Volume 4, Revision 1.	✓	
10.7 Radiation Safety Program – Leak Tests	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.	✓	
10.8 Radiation Safety Program – Safety and 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>	✓	
10.9 Radiation Safety Program – Transportation	Not required for submittal in license application.	Need not be submitted with application.	
10.10 Radiation Safety Program – Fixed Gauges Used at Temporary Job Sites	This is not applicable to our program. We will not use fixed gauges at temporary jobsites.	✓	
10.11 Radiation Safety Program – Security Program for Category 1 and Category 2 Radioactive Material	Not required for submittal in license application.	Need not be submitted with application.	
11. Waste Management-Gauge Disposal & Transfer	<p>Not required for submittal in license application.</p> <p>Waste Management procedure established in Radiation Safety Program.</p>	Need not be submitted with application.	

Martha Pavon

From: Jason Kelly
Sent: Friday, February 16, 2024 10:42 AM
To: Martha Pavon
Cc: Sandy Pavon
Subject: FW: U.S. NRC Materials License #21-20351-01 (Control No. 638578 - Request for Additional Information
Attachments: Letter (2-14-2024).pdf

Martha,

Attached is a Response to a Request for Additional Information Letter dated February 14, 2024 for Materials License No. 21-20351-01 (Weyerhaeuser NR Company), Docket No. 030-18287 for Control No. 638578.

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

From: Tadlock, Timothy <Timothy.Tadlock@weyerhaeuser.com>
Sent: Wednesday, February 14, 2024 10:26 AM
To: Jason Kelly <Jason.Kelly@nrc.gov>
Cc: Milligan, Bruce <Bruce.Milligan@weyerhaeuser.com>; Hudson, Tom <Tom.Hudson@weyerhaeuser.com>
Subject: [External_Sender] U.S. NRC Materials License #21-20351-01 (Control No. 638578 - Request for Additional Information

Jason,

I am in receipt of the email requesting additional information for Weyerhaeuser's Grayling OSB renewal application of US NRC Material License 21-20351-01.

Attached are the requested areas that needed additional or clarifying information.

- Revised Weyerhaeuser Submittal Information Items 5 through 11 (revision 2-14-24)
 - o Specific items revised:
 - Section 7.1
 - Inserted additional wording stating that future RSOs will sign a Delegation of Authority acknowledging acceptance of responsibility for radiation safety onsite.
 - Section 10.3
 - Inserted additional wording stating that the mill will develop, implement, and maintain procedures for ensuring accountability of licensed materials.
 - Signed Delegation of Authority acknowledging that I have accepted the responsibility of radiation safety at the Weyerhaeuser Grayling OSB mill.

Please let me know if you have any additional questions.

Tim Tadlock

Environmental Manager
Environmental Compliance East Region



From: Jason Kelly <Jason.Kelly@nrc.gov>
Sent: Wednesday, February 14, 2024 10:23 AM
To: Tadlock, Timothy <Timothy.Tadlock@weyerhaeuser.com>
Subject: [EXTERNAL] U.S. NRC Materials License #21-20351-01 - Request for Additional Information

Mr. Tadlock:

Good morning. I have reviewed the application dated January 15, 2024, signed by Bruce Milligan, Plant Manager, for the renewal of your U.S. Nuclear Regulatory Commission (NRC) Materials License No. 21-20351-01.

The U.S. NRC's guidance document for your category of license is NUREG-1556, Volume 4, Rev. 1, dated July 2016, "Consolidated Guidance About Materials Licenses, Program-Specific Guidance About Fixed Gauge Licenses," which I refer to below as "the guidance," is available on the U.S. NRC website at: <https://www.nrc.gov/docs/ML1618/ML16188A048.pdf>

Upon review of the request, I identified the following areas in which additional or clarifying information is needed:

1. Section 8.10.3, "Material Receipt and Accountability," of the guidance, specifies that licensed materials must be tracked "from cradle to grave" in order to ensure gauge accountability; identify when sealed sources/gauges could be lost, stolen, or misplaced; and ensure that possession limits listed on the license are not exceeded. Licensees must do the following:

- maintain records of receipt, transfer, and disposal of gauges; and
- conduct physical inventories every 6 months (or at other intervals justified by the applicant and approved by the NRC) to account for all sealed sources.

While your application includes a commitment to performing physical inventories there was not a commitment to developing, implementing and maintaining procedures for ensuring accountability of licensed materials at all times.

As indicated in the "Response from Applicant," area of this section, please revise this section of your application to also include:

- the statement: "We will develop, implement and maintain procedures for ensuring accountability of licensed materials at all times."

2. Section 8.7.1, "Radiation Safety Officer," of the guidance, identifies that the Radiation Safety Officer (RSO) is responsible for the oversight of licensed operations. The RSO must have sufficient organizational authority and management prerogative to enforce appropriate radiation protection rules, standards, and practices.

I recommend that you obtain a signed Delegation of Authority from your company's management identifying your continuing appointment and authority as Radiation Safety Officer. The attached model Delegation of Authority is also available in Appendix C, "Typical Duties and Responsibilities of the Radiation Safety Officer," of the guidance. As this item is only advisory in nature, no specific response to this item is required.

Please provide a written response to this request within 30 calendar days that is signed by a management representative. To ensure proper routing, please include a reference to your company's U.S. NRC Materials License No.

21-20351-01 along with Control No. 638578. Once you are ready to submit the response, you may forward it to me via e-mail. If you do not receive a prompt acknowledgement of receipt, you are also welcome to send a confirming hardcopy by U.S. Mail to the address in my signature block below.

As you will not receive a hardcopy of this request, please respond to this e-mail verifying that you have received it and were able to access the attachment.

Please contact me at (630) 829-9737 or Jason.Kelly@nrc.gov if you have any questions or if you need additional time to respond to this request.

I hope you have a good day, including a Happy VaLENTines Day and Ash Wednesday if you observe those days.

Jason M. Kelly, MPH, CPH
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