



Utah!

Where ideas connect

Department of Environmental Quality
Division of Radiation Control

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August 14, 2003

Richard L. Woodruff
Regional Agreement State Officer
U.S. Nuclear Regulatory Commission
Region II
61 Forsyth Street SW Suite 23T85
Atlanta, Georgia 30303-8931

Dear Mr. Woodruff:

This correspondence is in response to the Integrated Materials Performance Evaluation Program (IMPEP) Draft Report that documents the results of our review held June 22-27, 2003. The Division of Radiation Control Staff has reviewed the draft report and provides the following corrections for your consideration:

- Page 5, paragraph 3, first sentence: Reference is made to the "Division Director." This should be changed to "Executive Secretary of the Utah Radiation Control Board."
- Page 6, paragraph 5, line 4: "Director" should be changed to "Secretary."
- Page 8, paragraph 3: In the first line, it is recommended that "Department's Statute" be changed to "Utah Code Annotated." For the second sentence, we suggest that it be changed to, "If the Division releases allegation records, they can be redacted to protect the privacy of the alleged." At the end of the third sentence, please add "particularly if the Division is compelled by court action to divulge the information."
- Page 8, paragraph 6, line 4: Delete "Title R313, Environmental Quality, Radiation Control" and replace with "Radiation Control Act."
- Page 9, paragraph 2, first sentence: Delete "Title 19, Chapter 3," and replace "Utah Code" with "Utah Administrative Code."
- Page 10, paragraph 2, line 2: Change "Toole" to "Tooole."
- Page 10, paragraph 3, line 6: Delete "naturally occurring and accelerator produced material (NARM)."
- Page 11, paragraph 3, starting with the fourth sentence we have reprinted the text. Additions are shown with an underline and deletions are bracketed and interlined. "A review of this plan shows that required training was provided to [some] all staff. However, several of the W&E Section staff have not completed the recommended training for their positions. In particular, those hired after the last IMPEP review have not completed [the required and] all of the recommended training. [the health physics and radiation protection areas.] W&E Section staff interviews and the inspector (transportation specialist) accompaniment also showed that the level of knowledge in [these areas] the health physics and radiation protection areas needs improvement for selected staff. A review of the individual Qualification Forms shows that the forms have not been

maintained up to date. However, the affected forms were updated during the review and current forms were made available for review. The review team discussed specialized training planned for all technical staff in the area of health physics instrumentation (see Section 3.1), and in addition, the possibility of utilizing professional organizations information resources, such as the Health Physics Society, to help accommodate training needs. The review team recommends that W&E Section staff be provided the recommended training listed in the training plan, and that individual Qualification Forms continue to be updated, as appropriate."


- Page 12, paragraph 4, last sentence: Before this statement, insert "The radiological safety aspects associated with the mixed waste cell have been evaluated as part of routine inspections. However, the Management.... After "module" please add, "to address unique radiation safety issues at the mixed waste operations facility."
- Appendix C, Inspector Accompaniments, Accompaniment No.: 4: Please add "/Generator Site Access" after "Waste Disposal."
- Appendix D, License Casework Reviews, File No.: 4: Please change "exceeds" to "is less than" in the comment. A copy of the affected page from the license and page 1 of the Sealed Source and Device Registry Sheet are enclosed.

We appreciated the thoroughness and open nature of the IMPEP review. The various discussions between Division staff and IMPEP team members resulted in a mutual exchange of useful information. The performance-based nature of this review was also evident. We understand the recommendations as stated in the report. For discussion purposes, the following is offered regarding the recommendations:

- The review team recommends that additional training in the revised Administrative Policy regarding allegations be provided to all Division managers and technical staff, and to assure the policy is fully implemented. Please be advised that a staff training session has been scheduled for September 9, 2003. It will be noted, during the training, that the policy is fully implemented.
- The review team recommends that W&E Section staff be provided the training listed in the training plan, and that individual Qualification Forms be updated, as appropriate. As noted in our proposed revision to Section 4.3.1, the W&E Section staff has all received the required training that was outlined in the training plan, but some of the staff has not yet received the recommended training. The affected Qualification Forms have all been updated and this occurred while the IMPEP review team was on-site.

Thank you for the opportunity to respond to the draft report. If you have questions regarding any of the changes we have suggested, please contact me at (801) 536-4264.

Sincerely,


Craig W. Jones, Acting Director
Division of Radiation Control

Enclosure: As stated

cc: Dianne R. Nielson, Executive Director, DEQ

FEB 06 2001

DRC-03
October 1989

RENEWAL
UTAH DEPARTMENT OF ENVIRONMENTAL QUALITY
DIVISION OF RADIATION CONTROL
RADIOACTIVE MATERIAL LICENSE

FILE

Pursuant to Section 19-3-104, Utah Code Annotated, (1953 as amended), and the Utah Radiation Control Rules, and in reliance on statements and representations heretofore made by the licensee designated below, a license is hereby issued authorizing such licensee to transfer, receive, possess and use the radioactive material designated below; and to use such radioactive material for the purpose(s) and at the place(s) designated below. This licensee is subject to all applicable rule and orders now or hereafter in effect and to any conditions specified below.

LICENSEE

1. Name Mark Steel Corporation

2. Address P.O. Box 16006
 Salt Lake City, Utah 84116

) 3. License Number UT 1800293

) Amendment #08

)*****

) 4. Expiration Date

) July 31, 2005

)*****

) 5. License Category - 3-d

) In accordance with application dated June 15

) 2000, this license is amended in its entirety.

6. Radioactive material element
 and mass number

7. Chemical and/or physical form

8. Maximum quantity licensee
 may possess at any one time

A. Iridium-192

A. Sealed radiography sources
 contained in source assemblies
 registered pursuant to R313-
 22-210 or an equivalent U.S.
 Nuclear Regulatory
 Commission or Agreement
 State regulation

A. Not to exceed 3.7
 terabecquerels
 (100 Ci) per source and
 37 terabecquerels (1,000 Ci)
 total

B. Depleted Uranium

B. Metal

B. 999 kilograms

9. AUTHORIZED USE

A. For use in compatible radiographic exposure devices registered pursuant to R313-22-210 or an equivalent Nuclear Regulatory Commission or Agreement State Regulation for performing industrial radiography and in a compatible source changer registered pursuant to R313-22-210 or an equivalent Nuclear Regulatory Commission or Agreement State regulation for source storage and exchange.

B. For use as shielding in radiography devices.

REGISTRY OF RADIOACTIVE SEALED SOURCES AND DEVICES
SAFETY EVALUATION OF DEVICE

(AMENDED IN ITS ENTIRETY)

NO.: CA0384D109S

DATE: October 24, 1997

PAGE: 1 of 8

DEVICE TYPE: Radiography Device

MODEL: IR-100

MANUFACTURER/DISTRIBUTOR: Industrial Nuclear Co.
14320 Wicks Blvd.
San Leandro, CA 94577
(5 10) 352-6766 (voice)
(510) 352-6772 (fax)

SEALED SOURCE MODEL DESIGNATION:

1. Industrial Nuclear Models 32, and 33.
2. Equivalent Source from other Manufacturers.

ISOTOPE:

MAXIMUM ACTIVITY:

Iridium 192

120 curies

Depleted Uranium (as shielding)

32 pounds

LEAK TEST FREQUENCY:

Six (6) months

PRINCIPLE USE: Industrial Radiography (A)

CUSTOM SOURCE: ☐ YES ☒ NO