

October 13, 2005

Ms. Rachel S. Browder, Health Physicist
Nuclear Materials Licensing Branch
Region IV
Arlington, Texas 76011

RE: New license clarification and response to request for additional information.
License Number: 50-29212-01

Dear Ms. Browder:

We request to perform removal and relocation of the gauges and conduct radiation surveys of the gauges.

To help clarify item number 17 in the NRC Material License form 374:

- A) There will be times, however, very few, where non-routine maintenance will take place such as; removal and installation of a gauge when pipe replacement is needed and to conduct routine radiation surveys. Only authorized employees who have completed the required training for non-routine maintenance will perform these procedures. The gauge manufacturer will provide training for non-routine maintenance. The manufacturer's instructions and recommendations will be followed when performing non-routine maintenance.
- B) Any non-manufacturer/non-distributor supplied replacement component or parts or the use of any materials, (e.g., lubricants) other than those specified or recommended by the manufacturer or distributor will be evaluated to ensure that they do not degrade the engineering safety analysis performed and accepted as part of the device registration.

Removal, Relocation and performing Surveys procedure.

- A) During any of these procedures, radiation doses will be monitored to keep personnel that are performing these tasks within the regulatory limits and ALARA will be implemented. Dosimeters will be provided as required. For removal and relocation all gauges will have the shutter locked. A survey will be conducted before removal, prior to installation and after installation is complete. This procedure will help insure that the gauge is ready to function as designed and source integrity is not compromised. In all cases all non-routine maintenance procedures will be performed in the field with the working area flagged to keep unauthorized individuals out of the area.
- B) For any long-term storage, all gauges will be contained in an area secured against unauthorized removal or access.

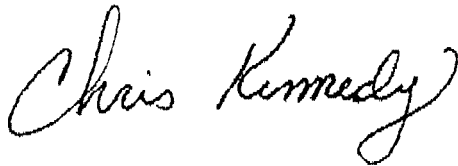
- C) Any individuals performing non-routine procedures will wear ~~both whole body and~~ extremity monitoring devices. This procedure will help insure that these individuals will not receive, in one year, a radiation dose in excess of 10% of the allowable limits.
- D) Individuals will commit to performing surveys with a certified survey instrument.
- E) All surveys will be conducted as stated above.
- F) The survey records and records of the instrument used, showing that radiation levels correlate meet with the requirements in 10 CFR 20.2103, all records will be retained for 3 years.

per email
dtd 10/20/05
from Mr.
Chris Kennedy
-RJB
10/20/05

Additional request:

- A) Please add to Item 7; additional sources as delineated on the Sealed Source Device Registry for the Ronan SA-1 gamma gauge for Cs-137.

Thank you,



Chris Kennedy
Pogo Mine Maintenance Superintendent
Radiation Safety Officer

From: "Kennedy Chris POGO" <Chris.Kennedy@teckcominco.com>
To: "Rachel Browder" <RSB3@nrc.gov>
Date: 10/20/05 11:17AM
Subject: RE: Request attached(draft)

Rachel,
I see what you mean; can we omit, "whole body" and just use the extremity monitoring?
Also did you get the final "faxed" version, verse the one I sent by email?

Chris

-----Original Message-----

From: Rachel Browder [mailto:RSB3@nrc.gov]
Sent: Thursday, October 20, 2005 8:13 AM
To: Kennedy Chris POGO
Subject: Re: Request attached(draft)

Chris,
Your draft is fine. One question for your consideration ~ in reading your submittal I understand that you are committing to the following ~ that individuals who perform non-routine procedures will wear both whole body and extremity monitoring devices to help ensure that those individuals do not exceed 10% of the allowable limits.

Is that your intent? ~ which is fine, I just want to make sure.

However, you may want to consider the following type of commitment which allows a little more flexibility in the event you obtain enough exposure data and want to discontinue exposure monitoring because the data supports that the individuals do not exceed 10% of the limit. Therefore, you have the flexibility to discontinue exposure monitoring without requesting a license amendment to change the commitment you made.

"Either the individuals who perform non-routine procedures will wear both whole body and extremity monitoring devices OR you will perform a prospective evaluation demonstrating that the unmonitored individuals performing non-routine maintenance will not likely receive in one year, a radiation dose in excess of 10% of the allowable limits. If the evaluation demonstrates that the individual will receive greater than 10% of any of the allowable limits, then they will be monitored with both whole body and extremity monitoring devices. You will maintain the evaluation on file."

Thank you,
Rachel

Rachel Browder, Health Physicist
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