

Michael Hampton, CSP
Director, Regulatory Compliance
Headwaters Incorporated
10653 So. Riverfront Parkway, Suite 300
South Jordan, UT 84095
801-984-9498
801-984-9410 (fax)

Facsimile transmittal

To: Bill Reichhold

Fax: 630-515-1078

From: Michael Hampton

Date: July 27, 2007

Re: Covol Engineered Fuels - Chinook

Pages: 3

CC:

☐ Urgent

☐ For Review

☐ Please Comment

☐ Please Reply

The following additional information is needed to review your request.

1. Please specify the total activity of californium-252 you wish to use. For example, 2 gauges, using 13.5 millicuries per gauge, for a total of 27 millicuries of californium-252.
2. You requested Ron Hutchcraft as an Alternate Radiation Safety Officer (RSO). Please note, we do not allow licensees to have more than one permanent RSO on a license. You may wish to have Mr. Hutchcraft designated as an individual who will assist (help with duties, "cover" for Mr. Wood when the RSO is ill, on vacation, etc.) the RSO within your organizational structure, however, we do not authorize more than one RSO on the license. An individual who wants to be an "assistant RSO" needs to have successfully completed the required training for an RSO.
3. Please commit that, "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, Volume 4, dated October 1998. Within 30 days of naming a new RSO, we will submit the new RSO's name to the NRC to include in our license".
4. I am unable to find the sealed sources and suppliers you requested. For example, there is no approval for an Amersham Model CVN.CN2 model sealed source. Also, no AEA Technology QSA Model supplier (the registry sheet indicates "QSA Global, Inc. Models). Please confirm that you will only use sealed sources and suppliers that are approved on the Sealed Source and Device Registration sheet NR-1195-D-101-S.
5. You indicated that the "Radiation Safety Program Public Dose", "Radiation Safety Program Minimization of Contamination" and "Waste Management" are not applicable in your application. These areas still need to be addressed in your radiation safety program, but they do not need to be submitted with the application. Please confirm that these topics will be included and addressed in your radiation safety program (see NUREG-1556, Volume 4).
6. Please commit to maintaining records of the leak test results. See item 10, Radiation Safety Program, - Leak Tests.

Response to Comments

1. The amount of Californium 252 material on site will consist of one gauge with 13.5 millicuries (497 MBq) (25ugm) in up to 8 sources.
2. The Radiation Safety Officer for the Chinook operation will be Dave Wood. In his absence, Mr. Ron Hutchcraft will assist him in his duties as RSO. Both individuals have completed RSO training meeting the criteria in the section entitled "Individual Responsible for Radiation Safety Program and their Training Experience - Radiation Safety Officer in NUREG-1556, Vol. 4. We understand that the RSO listed on the license will be Dave Wood. Mr. Hutchcraft has been selected to assist Mr. Wood and is designated as such in our organization.
3. Any individual designated as RSO will complete a course of instruction meeting the criteria in the section entitled "Individual Responsible for Radiation Safety

Program and their Training Experience - Radiation Safety Officer in NUREG-1556, Vol. 4 **prior** to assuming the RSO duties.

4. We will only use sealed sources and suppliers that are approved on the Sealed Source and Device Registration sheet NR-1195-D-103-S.
5. We will address the following three areas of interest in our facility Radiation Safety Program:
 - a. Radiation Safety Program Public Dose
 - b. Radiation Safety Program Minimization and Contamination
 - c. Waste Management
6. Records of leak test results will be maintained in accordance with NUREG-1556 requirements.