

United States Nuclear Regulatory Commission  
Region IV  
611 Ryan Plaza Drive Suite 400  
Arlington Texas 76011-8064

June 11, 2007

Attn: Ms. Jacqueline D. Cook

Re: New License Application  
Docket No. 030-37442  
Control No. 471320

Information Required for Change of Control and/or Change of Ownership (to include name change)  
Source: Appendix F of NUREG -1556 , Volume 15 (Date Published : November 2000)

Ms Cook:

In response to your fax dated June 2, 2007 requesting additional information, related to the change of control regarding the two underwater cesium gauging devices, I respectfully submit the following:

Item 1A: Description of Transaction

Response: ANR Pipeline Company, a subsidiary of TransCanada, owns two Cesium 137 sealed sources installed on subsea pipelines approximately 70 miles off the coast of Louisiana in the Gulf of Mexico, under approximately seventy-five (75) feet of water buried to a depth of a minimum of four (4) feet.

ANR Pipeline Company was recently purchased by TransCanada from El Paso Corporation. As such, we are applying for a Materials License for these two underwater seal sources.

Item 1B: New Name of Licensed Organization

Response: TransCanada

Item 1C: New contact and new telephone number

Response: Salvatore J. Delisi / (313) 240-7205 (office); (313) 268-7203 (cellular)

Item 2: Describe any changes in personnel or duties that relate to the licensed program. Include training and experience for new personnel

Item 2A: Changes in personnel having control over licensed activities (e.g. officers of a corporation.

Response: Corporate Officer: Mr. David Montemurro  
Title: Vice President Engineering and Operations Services

Item 2B: Changes in personnel named in the license (e.g. RSO, Aus) including training, experience and responsibilities.

Response: (a) Salvatore J. Delisi – Radiation Safety Officer

- Successfully completed 16 hour seminar on "Administration of Isotope Radiography
- Safety Programs" administered by Sentinel – OSA Global.
- Successfully completed 40 hour course on "Radiation Safety Aspects of Isotope
- Radiography" administered by Amersham.
- Has 15 years experience in industrial radiography

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(b) Jack D. Adrianse, Jr. – Associate Radiation Safety Officer

- Successfully completed 16 hour seminar on “Administration of Isotope Radiography Safety Programs” administered by Sentinel – OSA Global.
- Successfully completed 40 hour course on “Radiation Safety Aspects of Isotope Radiography” administered by Tech/Ops Inc.
- Has 20 years experience in industrial radiography.

Item 3: Describe, in detail, any changes to the organization, facilities, equipment or procedures that relate to the Licensed Program

Response: The transfer of the gauging devices is a result of the sale of ANR Pipeline from El Paso Corporation (dba ANR Pipeline Company) to TransCanada. ANR Pipeline Company has been, and will continue to be the owner of the pipeline to which these gauging devices are attached and will continue to maintain control over the devices. The physical location of the gauging devices has not and will not change from its present location.

Item 4: Describe the status of the surveillance program (i.e. surveys, wipe tests, quality control) at the present time and the expected status at the time that the control is to be transferred:

Item 4A: Description of the status of all surveillance program.

Response: Because the gauging devices are located approximately 70 miles off the coast of Louisiana in approximately seventy-five (75) feet of water, buried to a minimum of four (4) feet of natural earth cover we would request a waiver of the survey and leak test requirements. These sources are physically inaccessible.

El Paso Corporation's (dba ANR Pipeline Company) current Materials License (42-32335-01) includes the following statement specified under item 14:

*“The sealed sources specified in Item 7.a., while remaining in underwater storage, require no testing for leakage and/or contamination”.*

Exemption We request that this same exemption be included in our License. Because the sources are physically inaccessible, leak testing and/surveying of these devices will not be practical.

Please review the attached materials and forward any comments or clarifications to me using the most convenient method indicated below.

Thank you again for your assistance in this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "Salvatore J. Delisi". The signature is fluid and cursive, with the first name "Salvatore" being more prominent and the last name "Delisi" following in a similar style.

Salvatore J. Delisi

ANR Pipeline Company  
TransCanada Pipeline  
15170 Commerce Drive North  
Dearborn, Michigan 48120-1272  
(313) 240-7205 (Office)  
(313) 269-7203 (Cell)  
(313) 271-0047 (FAX)  
salvatore\_delisi@transcanada.com

Information Required for Change of Control and/or Change of Ownership  
(to include a name change)  
source: Appendix F of NUREG-1556, Volume 15 (Date Published: November 2000)

Please provide the following information concerning changes of control (transferor and/or transferee, as appropriate). If any items are not applicable, so state.

1. Provide a complete description of the transaction (i.e., transfer of stocks or assets, or merger). Indicate whether the name has changed and include the new name. Include the name and telephone number of a licensee contact who NRC may contact if more information is needed.

A. Description of the transaction:

B. ☐ No name change

☒ New name of licensed organization (please clarify the parent company - TransCanada or ANR Pipeline Company. In addition, please be very specific concerning the new name - we want to issue the license to the correct legal entity): TransCanada

C. ☐ No change in contact

☒ New contact: Salvatore J. Delisi 313-268-7203  
☒ New telephone number: 313-240-7205 (office) (cell)

2. Describe any changes in personnel or duties that relate to the licensed program. Include training and experience for new personnel.

A. ☐ No changes in personnel having control over licensed activities.

☒ Changes in personnel having control over licensed activities (e.g. officers of a corporation): See attached response

B. ☐ No changes in personnel named in the license.

☒ Changes in personnel named in the license (e.g. RSO, AUs) - including training, experience and responsibilities: See attached response

3. Describe, in detail, any changes in the organization, location, facilities, equipment or procedures that relate to the licensed program.

☒ Organization:

☐ Equipment:

☐ Location:

☒ Procedures:

☐ Facility:

☐ Not applicable

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El Paso Corporation  
d/b/a ANR Pipeline Company

4. Describe the status of the surveillance program (i.e., surveys, wipe tests, quality control) at the present time and the expected status at the time that control is to be transferred.

A. Description of the status of all surveillance program:

*See attached response*

B. Surveillance Items & Records: calibrations, leak tests, surveys, inventories, and accountability requirements will be current at the time of transfer

☒ Yes      ☐ No (explain)

5. Confirm that all records concerning the safe and effective decommissioning of the facility will be transferred to the transferee or to NRC, as appropriate. These records include documentation of surveys of ambient radiation levels and fixed and/or removable contamination, including methods and sensitivity.

Records transferred to:

☒ New licensee      ☐ NRC for license termination      ☐ Not applicable

6. Confirm that the transferee will abide by all constraints, conditions, requirements and commitments of the transferor or that the transferee will submit a complete description of the proposed licensed program.

☐ Description of proposed licensed program attached

OR

Trans Consols (transferee) will abide by all constraints, conditions, requirements and commitments of EL Paso Corporation dba ANR Pipeline Company (transferor)

David L. Culbertson RSO  
Signature/Title  
Transferee

6/7/07  
date

Salvatore J. Delisio/RSO  
Signature/Title  
Transferor

6/7/07  
date

OR

☐ Not applicable (name change only)

\_\_\_\_\_  
Certifying Officer - Signature

\_\_\_\_\_  
Date

\_\_\_\_\_  
Certifying Officer - Typed name and title