

From: [Wilson, Scott](#)
To: [DuLaney, Robert \(Coatings\)](#)
Subject: RE: Clarification of Non-Routine maintenance operations
Date: Thursday, April 25, 2013 9:00:00 AM
Importance: High

Mr. DuLaney,

Thank you for the e-mail. Unfortunately, NRC Policy prohibits us from using email text license commitments. It is important that our documentation is clear regarding your commitment to not conduct non-routine maintenance, and your training. In order to complete my review of your license application and to issue the license, I will need the following items submitted (provided the statements are true). It is acceptable to scan the letter(s) and submit them via email as an attachment.

1. Please submit a letter, signed by a principal of the company, stating the following:

- *"We will implement and maintain procedures for routine maintenance of our gauges according to each manufacturer's or distributors written recommendations and instructions."*
- *"The gauge manufacturer, distributor or other person authorized by NRC or an Agreement State will perform non-routine operations such as installation, initial radiation survey, repair, and maintenance of components related to the radiological safety of the gauge, gauge relocation, replacement, and disposal of sealed sources, alignment, or removal of a gauge from service."*

2. Please submit a letter, signed by a principal of the company, stating:

Before obtaining licensed materials, the proposed RSO will have successfully completed the training described in Criteria in the section "Individual(s) Responsible for Radiation Safety Program and Their Training and Experience - Radiation Safety Officer" in NUREG-1556, Vol. 4, dated October 1998.

AND

Before being named as the RSO, future RSOs will have successfully completed the training described in Criteria in the section "Individual(s) Responsible for Radiation Safety Program and Their Training and Experience - Radiation Safety Officer" in NUREG-1556, Vol. 4, dated October 1998. Within 30 days of naming a new RSO, we will submit the new RSO's name to NRC to include in our license.

In the future, it may be useful to consider using the Appendix B checklist from NUREG-1556, Volume 4, to provide information for Items 5 – 11 of NRC Form 313 (license application).

If you have any questions, please call me.

Sincerely,

Scott Wilson
Health Physicist
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From: DuLaney, Robert (Coatings) [mailto:Robert.DuLaney@cytec.com]
Sent: Wednesday, April 24, 2013 9:21 AM
To: Wilson, Scott
Subject: Clarification of Non-Routine maintenance operations

Scott: Per our conversation. This is a follow up letter confirming that Non- Routine Maintenance will be conducted by the Manufacture or qualified contractor with appropriate training and licensed by the NRC.

Yours

Robert L. Du Laney
Maintenance Superintendent, MRO Stores, Reliability
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