

From: [Lawyer, Dennis](#)
To: Walter.b.lucas@chemours.com
Subject: The Chemours Company, Request for Additional Information Concerning Application for a New License, Control 586571
Date: Tuesday, May 19, 2015 8:45:00 AM

Dear Mr. Lucas,

This is in reference to your application dated March 31, 2015, requesting for amendment to Nuclear Regulatory Commission License No. 47-35235-01, Docket No. 03038831. A phone call on May 14, 2015, with you provided clarifying information. In order to continue our review, we need the following additional information:

1. You listed generally licensed devices and request for gas chromatography in your application. Please confirm that you do not wish to transfer the generally licensed devices to your specific license and thus do not need authorization for gas chromatography on your license.
2. You did not specify the amount of material you wished to be licensed for each isotope. Please list the amount of material in activity that you wish to be licensed.
3. Your location of use by address, has two other material licensee's occupying this site. Please describe how you will maintain areas separately so that your materials will be geographically separate from the other two licensee's at the site.
4. In your application, Appendix B, Radiation Safety Program – Maintenance, it states that the information listed in Appendix N supports the request to perform non-routine operations. However, you did not list anything in Appendix N. Please confirm section 9.8 of the attached procedure 503, provided the procedures you will use for non-routine operations.
5. You have requested use of a portable gauge but did not provide the additional requested statements as listed in NUREG-1556, Volume 1, "Consolidated Guidance About Materials Licenses, Program-Specific Guidance About Portable Gauge Licenses." Please respond to the following:
 - a. For routine cleaning and lubrications of portable gauges, we will implement and maintain procedures for routine maintenance of our gauges according to each manufacturer's recommendations and instructions.
 - b. For non-routine maintenance of portable gauges, We will send the gauge to the manufacturer or other person authorized by NRC or an Agreement State to perform non-routine maintenance or repair operations that require the removal of the source or source rod from the gauge.
 - c. We will implement and maintain the operating, emergency, and security procedures in the Errata to Appendix H of NUREG-1556, Vol. 1, Revision 1, <http://pbadupws.nrc.gov/docs/ML0521/ML052130055.pdf>, and provide copies of these procedures to all gauge users and at each job site. OR provide alternate procedures. Your procedure 503, does not appear to discuss portable gauges.

We will continue our review upon receipt of this information. Please reply to my attention at the Region 1 Office (Address below) and refer to Mail Control No. 586571. If you have technical questions regarding this letter, please call me at (610) 337-5366.

Please note that you may not reply to this letter by return e-mail. Your reply must be in writing by letter, facsimile (610-337-5269), or signed letter attached to an email. If we do not receive a reply from you within 30 calendar days from the date of this e-mail, we will assume that you do not wish to pursue your application.

Region 1 Office Mailing Address: Licensing Assistance Team, US Nuclear Regulatory Commission Region I, 2100 Renaissance Boulevard, Suite 100, King of Prussia, PA 19406-2713.

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