



Kent County Road Commission

June 12, 2015

Sara A. Forster, Health Physicist Licensing Reviewer
U.S. Nuclear Regulatory Commission - Region III
Division of Nuclear Materials Safety
2443 Warrenville Rd. - Ste. 210
Lisle, IL 60532-4352
via email

Re: U.S. NRC – Application for Materials License
License number: 21-23325-02 (renewal)
2015 Renewal

Ms. Forster:

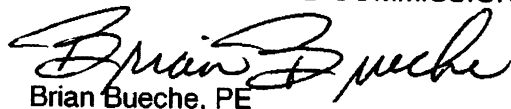
This is to confirm that the Kent County Road Commission currently has four (4) portable nuclear moisture-density gauges. They are Troxler model 3400 series.

Attached is the requested current memorandum for radiation safety officer appointment and delegation of authority.

This is to confirm that the Kent County Road Commission has a radiation survey meter in its possession.

This is to confirm that non routine maintenance and calibration of the gauges is performed by vendors licensed by the USNRC to perform such activities. Commission staff that are authorized users wipe gauges of dust, dirt, soil, etc. as is required during use.

Sincerely,
KENT COUNTY ROAD COMMISSION



Brian Bueche, PE

Engineer for Plats and Streets & Radiation Safety Officer
(616) 242-6901 X6911
bbueche@kentcountyroads.net

Attachments

cc: W. Harrall
T. Byle
File

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**Kent County
Road Commission**

MEMORANDUM

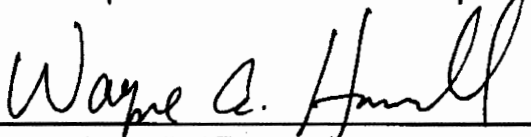
To: Brian Bueche PE,, Project Engineer, Radiation Safety Officer

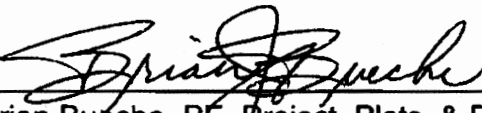
From: Wayne Harrall, PE, Deputy Managing Director - Engineering

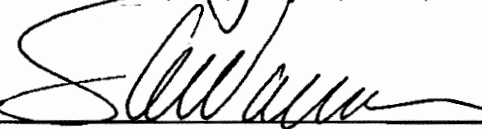
Date: June 5, 2015

Subject: Radiation Safety Officer Appointment & Delegation of Authority
(as required by Federal Regulations and US-NRC)

You have been appointed radiation safety officer and are responsible for ensuring the safe use of radiation (portable nuclear moisture-density gauges). You are responsible for managing the radiation protection program, identifying radiation protection problems, initiating, recommending, or providing corrective actions, verifying implementation of corrective actions, stopping unsafe activities, and ensuring compliance with regulations. You are hereby delegated the authority necessary to meet those responsibilities, including prohibiting the use of byproduct material by employees who do not meet the necessary requirements and shutting down operations, when justified, to maintain radiation safety. You are required to notify management if staff does not cooperate and does not address radiation safety issues. In addition, you are free to raise issues with the U. S. Nuclear Regulatory Commission at any time. It is estimated that you will spend as many hours per week conducting radiation protection activities as required.

 6/5/2015
Wayne Harrall, PE, Deputy Managing Director - Engineering

 6/5/2015
Brian Bueche, PE, Project, Plats, & Public Streets Engineer, Radiation Safety Officer

 6/12/2015
Steven A. Warren, Managing Director

H:/Gauges/2015-RSO-Designation&AuthorityDelegation-[150605]

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Kent County Road Commission

[150605]

The RSO's duties and responsibilities [are illustrated in Figure 8.1 and (NUREG – 1556, Vol. 1, Rev. 1)] typically include ensuring the following:

Licensed activities that the RSO considers unsafe are stopped;

- Possession, use, storage, and maintenance of sources and gauges are consistent with the limitations in the license, the Sealed Source and Device Registration sheet(s), and the manufacturer's recommendations and instructions;
- Individuals who use gauges are properly trained;
- When necessary, personnel monitoring devices are used and exchanged at the proper intervals; records of the results of such monitoring are maintained;
- Gauges are properly secured;
- Proper authorities are notified in case of accident, damage to gauges, fire, or theft;
- Unusual occurrences involving the gauge (e.g., accident, damage) are investigated, cause(s) and appropriate corrective action are identified, and corrective action is taken;
- Audits are performed at least annually and documented, and corrective actions are taken;
- Licensed material is transported in accordance with all applicable DOT requirements;
- Licensed material is disposed of properly;
- Appropriate records are maintained;
- An up-to-date license is maintained and amendment and renewal requests are submitted in a timely manner;
- Up-to-date operating and emergency procedures are developed, maintained, distributed, and implemented;
- Non-routine operations are performed by the manufacturer;
- Documentation is maintained to demonstrate, by measurement or calculation, that the TEDE to the individual member of the public likely to receive the highest dose from the licensed operation does not exceed the annual limit in 10 CFR 20.1301;
- When the licensee identifies violations of regulations or license conditions or program weaknesses, corrective actions are developed, implemented, and documented;
- Posting of documents required by 10 CFR 19.11 (Parts 19 and 20, license documents, operating procedures, NRC Form 3, "Notice to Employees"), and 10 CFR 21.6 (Part 21, Section 206 of Energy Reorganization Act of 1974, procedures adopted pursuant to Part 21) or posting a notice indicating where these documents can be examined.

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ITEMS 7 THROUGH 11: TRAINING AND EXPERIENCE, FACILITIES AND EQUIPMENT, RADIATION SAFETY PROGRAM, AND WASTE DISPOSAL

Item No. And Title	Suggested Response	Yes	Alternative Procedures Attached
7. INDIVIDUAL(S) RESPONSIBLE FOR RADIATION SAFETY PROGRAM AND THEIR TRAINING AND EXPERIENCE - RADIATION SAFETY OFFICER → Name: BRIAN BUECHE	Before obtaining licensed materials, the proposed RSO will have successfully completed one of the training courses described in Criteria in the section entitled "Individual(s) Responsible for Radiation Safety Program and Their Training and Experience - Radiation Safety Officer" in NUREG-1556, Vol. 1, Rev. 1, dated November 2001.	<input checked="" type="checkbox"/> Please provide a current, signed and dated MOU/DOA document for Brian J. Bueche, PE, including responsibilities designated to him and his acknowledgement of understanding and acceptance of those responsibilities.	<input type="checkbox"/>
8. TRAINING FOR INDIVIDUALS WORKING IN OR FREQUENTING RESTRICTED AREAS →	Before using licensed materials, authorized users will have successfully completed one of the training course described in Criteria in the section entitled "Training for Individuals Working In or Frequenting Restricted Areas" in NUREG-1556, Vol. 1, Rev 1, dated November 2001.	<input checked="" type="checkbox"/> Please confirm statement at left or otherwise confirm that training described in the January 28, 2015 application includes hands-on component	<input type="checkbox"/>
9. FACILITIES AND EQUIPMENT	No information needs to be submitted in response to this item; key issues are addressed under "Radiation Safety Program - Public Dose" and "Radiation Safety Program - Operating and Emergency Procedures."	Separate Item 9 Response Need Not Be Submitted With Application	meeting criteria in the guidance.
10. RADIATION SAFETY PROGRAM - AUDIT PROGRAM	The applicant is not required to, and should not, submit its audit program to NRC for review during the licensing phase.	Need Not Be Submitted With Application	
10. RADIATION SAFETY PROGRAM - TERMINATION OF ACTIVITIES	The applicant is not required to submit a response to the termination of activities section during the initial application. However, when the license expires when the licensee ceases operation, NRC Form 314 must be submitted.	Need Not Be Submitted With Application	
→ 10. RADIATION SAFETY PROGRAM - SURVEY INSTRUMENTS	We will either possess and use, or have access to and use, a radiation survey meter that meets the Criteria in the section entitled "Radiation Safety Program - Instruments" in NUREG-1556, Vol. 1, Rev. 1, dated November 2001.	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Item No. And Title	Suggested Response	Yes	Alternative Procedures Attached
→ 10. RADIATION SAFETY PROGRAM – MATERIAL RECEIPT AND ACCOUNTABILITY	Physical inventories will be conducted at intervals not to exceed 6 months, to account for all sealed sources and devices received and possessed under the license.	<input checked="" type="checkbox"/>	<input type="checkbox"/>
→ 10. RADIATION SAFETY PROGRAM – OCCUPATIONAL DOSIMETRY	Either we will maintain, for inspection by NRC, documentation demonstrating that unmonitored individuals are not likely to receive a radiation dose in excess of 10 percent of the allowable limits in 10 CFR Part 20, or we will provide dosimetry processed and evaluated by an NVLAP-approved processor that is exchanged at a frequency recommended by the processor.	<input checked="" type="checkbox"/>	<input type="checkbox"/>
10. RADIATION SAFETY PROGRAM – PUBLIC DOSE	The applicant is <i>not</i> required to submit a response to the public dose section during the licensing phase. This matter will be examined during an inspection.	Need Not Be Submitted With Application	
→ 10. RADIATION SAFETY PROGRAM – OPERATING AND EMERGENCY PROCEDURES	We will implement and maintain the operating and emergency procedures in Appendix H of NUREG-1556, Vol. 1, Rev. 1, dated November 2001, and provide copies of these procedures to all gauge users and at each job site. OR Operating and emergency procedures will be developed, implemented, and maintained and will meet the criteria in the section entitled "Radiation Safety Program – Operating and Emergency Procedures" in NUREG-1556, Vol. 1, Rev. 1, dated November 2001.	<input checked="" type="checkbox"/> <input type="checkbox"/>	<input type="checkbox"/>
→ 10. RADIATION SAFETY PROGRAM – LEAK TEST	Leak tests will be performed at intervals approved by NRC or an Agreement State and specified in the Sealed Source and Device Registration Sheet. Leak tests will be performed by an organization authorized by NRC or an Agreement State to provide leak testing services for other licensees or using a leak test kit supplied by an organization authorized by NRC or an Agreement State to provide leak test kits to other licensees and according to the kit supplier's instructions.	<input checked="" type="checkbox"/>	<input type="checkbox"/> The information in Appendix J supporting a request to perform leak testing and sample analysis is attached.

Item No. And Title	Suggested Response	Yes	Alternative Procedures Attached
→ 10. RADIATION SAFETY PROGRAM - MAINTENANCE	<i>Routine Cleaning and Lubrication</i> We will implement and maintain procedures for routine maintenance of our gauges according to each manufacturer's recommendations and instructions.	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	<i>Non-Routine Maintenance</i> 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. If the non-routine maintenance is performed, a procedure is needed. An explanation as to the need also is needed.	<input checked="" type="checkbox"/>	<input type="checkbox"/> The information listed in Appendix G supporting a request to perform non-routine maintenance in-house is attached.
10. RADIATION SAFETY PROGRAM - TRANSPORTATION	The applicant is <i>not</i> required to submit its response to transportation during the licensing process. However, this issue will be reviewed during inspection.	Need Not Be Submitted With Application	
11. WASTE MANAGEMENT - GAUGE DISPOSAL AND TRANSFER	The applicant is <i>not</i> required to submit a response to waste management during the licensing process. However, the licensee should develop, implement, and maintain gauge transfer and disposal procedures in its radiation protection program.	Need Not Be Submitted With Application	

KCRC 150612

P. 5 of 7

B-5

3/3

NUREG - 1556, Vol. 1, Rev. 1

Forster, Sara

From: Bueche, Brian <bbueche@kentcountyyroads.net>
Sent: Friday, June 12, 2015 1:17 PM
To: Forster, Sara
Cc: Harrall, Wayne; Byle, Tom
Subject: FW: Additional Information Request for Kent County Road Commission, NRC Lic. 21-23325-02
Attachments: 03121.585920.21-23325-02 telecon signed.pdf; 2015-USNRC-LicenseRenewalAdditionalInformation-[150612].pdf

Dear Ms. Forster,

Please see the attachment.



Brian Bueche, P.E.

Engineer for Plats & Public Streets
p. (616) 242.6901 ext. 6911 | f. (616) 242-6974
bbueche@kentcountyyroads.net

Kent County Road Commission

1500 Scribner Avenue NW, Grand Rapids, MI 49504
kentcountyyroads.net

From: Forster, Sara [<mailto:Sara.Forster@nrc.gov>]
Sent: Thursday, May 14, 2015 1:44 PM
To: Bueche, Brian
Subject: Additional Information Request for Kent County Road Commission, NRC Lic. 21-23325-02

Dear Mr. Bueche,

See the attached file for additional information needed to complete the review of the renewal application for NRC Lic. No. 21-23325-02. Note that the attached conversation record requests additional information by June 14, 2015. Additional guidance may be found in NUREG 1556, Vol. 1, Revision 1, "Program Program-Specific Guidance About Fixed Gauge Licenses," which may be found at:

<http://www.nrc.gov/reading-rm/doc-collections/nuregs/staff/sr1556/v1/r1/>.

Submission of your response as a pdf file attached to an email or via facsimile will allow for the quickest processing. Do not hesitate to call me with any questions you may have, or if you will need additional time to complete your response.

Sincerely,

Sara A. Forster, Health Physicist Licensing Reviewer
U.S. Nuclear Regulatory Commission - Region III
Division of Nuclear Materials Safety
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