



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
REGION IV  
1600 E LAMAR BLVD  
ARLINGTON, TX 76011-4511

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JUL 14 2015

DNMS



## EMAIL

**Name:** Adam Koplin  
**Organization:** Otter Tail Power Company  
**E-mail Address:** akoplin@otpc.com  
**From:** Jacqueline D. Cook  
**Date:** July 11, 2015  
**Subject:** Application dated January 7, 2015 for License Renewal  
**Pages:**

License: 40-26982-01  
Docket: 030-31026  
Control: 585863

Mr. Koplin:

Per your application dated January 7, 2015, the items on the next pages are deficiencies which require your response. **I apologize for the short notice but if you can respond to this e-mail by Thursday, July 16, 2015, it will be greatly appreciated.** Our fax number is (817) 200-1263. You may respond by e-mail in pdf format if you'd like. My email address is [Jackie.Cook@nrc.gov](mailto:Jackie.Cook@nrc.gov). When responding to this e-mail, please include the license, docket and control numbers located at the top of this page.

Please note that I used NUREG-1556, Volume 4, "Consolidated Guidance About Materials Licenses: Program-Specific Guidance About Fixed Gauge Licenses", dated October 1998. Please use this guidance when responding to the deficiencies on the following pages. (<http://www.nrc.gov/reading-rm/doc-collections/nuregs/staff/sr1556/v4/>).

Thanking you in advance for your cooperation, assistance, and prompt response in this matter.

/RA/  
Jacqueline D. Cook  
Senior Health Physicist

**PUBLIC**

- ☐ Immediate Release  
☒ Normal Release

**NON-PUBLIC**

- ☐ A.3 Sensitive-Security Related  
☐ A.7 Sensitive Internal  
☐ Other: \_\_\_\_\_

Reviewer: JDC Date: 7/19/15

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1. Please note that in Item 2 of the NRC Form 313 (your renewal application) dated January 7, 2015, the name of the licensee is specified as Otter Tail Power Company; however, Item 1 of your license (license #40-26982-01), amendment #04, specifies the licensee as Otter Tail Power Company, Big Stone Plant.

Please clarify this discrepancy.

Use Otter Tail Power Company, Big Stone Plant.

2. Please note that in looking at sealed source and device registry sheet IL-412-D-139-S, it states the isotope used in Kay Ray, Inc. Model 7062 is radium-226; however on your sheet attached to the renewal application dated January 7, 2015, the isotope listed for the Kay Ray, Inc. Model 7062 is cesium-137.

Please clarify this discrepancy and specify either the correct isotope used in the Kay Ray, Inc. Model 7062 or specify the correct gauge model (i.e., 7062 B, 7062 BP, 7062 H, or 7062<sup>PH</sup>). Our Kay Ray models 7062 do have Cesium-137 stamped on it.

3. Please provide either of the following:

The statement: "Before using licensed materials, authorized users will have successfully completed one of the training courses described in Criteria in the section entitled 'Authorized Users' in NUREG-1556, Vol. 4, 'Consolidated Guidance about Materials Licenses: Program-Specific Guidance about Fixed Gauge Licenses,' dated October 1998." We conduct a yearly 8 hour class presented by the RSO.

OR

4. Please provide one of the following:

A statement that: "Surveys pursuant to 10 CFR 20.1501 will be performed by a person specifically authorized by the NRC or an Agreement State to perform these surveys.

OR

A statement that: "We will use instruments that meet the Criteria in the section entitled 'Radiation Safety Program – Instruments, in NUREG-1556, Vol. 4, dated October 1998, and one of the following three choices:

- Each survey meter will be calibrated by the manufacturer or other person authorized by the NRC or an Agreement State to perform survey meter calibrations.

OR

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- We will implement the model survey meter calibration program published in Appendix I to NUREG-1556, Vol. 4, dated October 1998.

OR

- "We will submit alternative calibration procedures for NRC review."

5. It was not clear where you put your "X" in your renewal application dated January 7, 2015, Item 10 Radiation Safety Program – Material Receipt and Accountability, page D-10 so please provide either of the following:

A statement that: "Physical inventories will be conducted at least every 6 months or at other intervals approved by the NRC, to account for all sealed sources and devices received and possessed under the license."

OR

A description of the procedures for ensuring that no fixed gauge has been lost, stolen, or misplaced and how often they will be conducted.

6. Please provide one of the following:

A statement that: "We will perform a prospective evaluation demonstrating that unmonitored individuals are not likely to receive, in one year, a radiation dose in excess of 10% of the allowable limits in 10 CFR Part 20 or we will provide dosimetry that meets the Criteria in the section entitled 'Radiation Safety Program – Occupational Dosimetry' in NUREG-1556, Vol. 4, dated October 1998. We conduct a Wipe test every 3 years

OR

A description of an alternative method for demonstrating compliance with the referenced regulations.

7. Although you stated in your renewal application dated January 7, 2015, Item 10 Radiation Safety Program – Maintenance, page D-15 that you do not do non-routine maintenance, for non-routine operations, commit to the following: "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." **This is true**

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**NON-PUBLIC**

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☐ A.7 Sensitive Internal  
☐ Other:

Reviewer: QAC

Date: 7/19/15