



CONVERSATION RECORD

DATE OF SIGNATURE

09/03/2019

NAME OF PERSON(S) CONTACTED OR IN CONTACT WITH YOU

Stephen Porterfield

DATE OF CONTACT

09/03/2019

TYPE OF CONVERSATION

☐ E-MAIL☒ TELEPHONE☐ INCOMING☒ OUTGOING

E-MAIL ADDRESS

stephen.porterfield@buzziunicemusa.com

TELEPHONE NUMBER

(573) 335-5591

ORGANIZATION

Lone Star Industries d/b/a Buzzi Unicem USA

DOCKET NUMBER(S)

030-32408

LICENSE NUMBER(S)

24-26333-01

CONTROL NUMBER(S)

612462

SUBJECT

Additional Information Needed for License Amendment

SUMMARY

This record is in reference to the NRC license amendment request dated May 15, 2019, and the resulting conversation between Stephen Porterfield, and NRC license reviewer Erin Kennedy. Please carefully review the items listed on page 2 of this record and provide a signed and dated response.

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ACTION REQUIRED (IF ANY)

Please submit your response by September 5, 2019 and reference it to my attention as "additional information to control number 612462" to facilitate proper handling in our office. Your response must be currently dated and signed. If you have any questions or require clarification of any of the information stated above, please do not hesitate to contact me at 630-829-9876

In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice," a copy of this letter and its enclosure will be available electronically for public inspection in the NRC Public Document Room or from the NRC's Agencywide Documents Access and Management System (ADAMS), accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html>.

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NAME OF PERSON DOCUMENTING CONVERSATION

Erin Kennedy

SIGNATURE

CONVERSATION RECORD (continued)

SUMMARY: (Continued from page 1)

Naming a new RSO:

1. As we discussed, it is your intention to provide a new Delegation of Authority document, signed by both the proposed RSO and a senior manager who is responsible for oversight of the radiation safety program (typically the plant manager). For your convenience, a sample delegation of authority is attached to this conversation record.

Adding a new device to the License:

In order to add the new custom APEX Air Material Analyzer to your license I will need some clarification regarding your amendment request:

2. As we discussed on the phone, it is not your intention to have plant personnel preform removal and relocation of the sources following an emergency or and unusual event. If that is the case, please provide a request to withdraw the following text from your amendment request "Please amend Condition 15 to permit plant personnel to perform removal and relocation of the sealed sources as may be necessary following an unusual event or apparent emergency." As we also discussed you may resubmit the package dated May 15, 2019 without that text.

3. It was unclear from the information provided how leak test will be preformed and analyzed on the custom APEX Air Material Analyzer. As we discussed, you intend to have leak tests analyzed by an organization licensed by the NRC or an Agreement State to provide leak testing services. Please provide the following commitment:

"Leak tests will be performed on the custom APEX Air Material Analyzer every 6 months. Leak tests will be performed by an organization licensed by the NRC or an Agreement State to provide leak testing services to other licensees; or using a leak test sample collection kit supplied by an organization licensed by the NRC or an Agreement State to provide leak test kits and/or sample analysis services to other licensees and according to the kit supplier's instructions. Records of leak test results will be maintained."

4. It was unclear from the information provided who would perform non-routine maintenance operations on the custom APEX Air Material Analyzer. It is my understanding from our discussion that all non-routine maintenance operations will be preformed by XRSciences. Please provide the following commitment:

"The gauge manufacturer, distributor, or other person authorized by the NRC or an Agreement State will perform non-routine operations on the custom APEX Air Material Analyzer such as installation, initial radiation survey, repair and maintenance of radiological safety components, relocation, replacement, alignment, removal from service, and disposal of sealed sources."

5. The information provided shows that the dose rate above the custom APEX Air Material Analyzer is greater than 5 mRem/ hour and will be posted "Caution Radiation Area". It is my understanding from our discussion that personnel will not have access to the area above the device, will not work above the device, and that you will have a posting that prior to accessing the area above the device personnel must contact the Radiation Safety Officer. Please provide a commitment regarding the access to the top of the device.