

Kelly, Jason

From: Kelly, Jason
Sent: Tuesday, November 5, 2019 11:13 AM
To: pchimenti@us.nlmk.com
Subject: Control Number 614080 - US NRC RML #13-32628-01 Amendment Requests (8-27-2019 and 10-25-2019)

Mr. Chimenti:

I am preparing the amendment to your license and need some clarification concerning the requested radioactive material authorizations.

1. With this amendment request, I understand that you are wanting to place your Ronan Model SA-1 fixed gauging devices in a storage as you are proposing to replace them with another technology. I am proposing to change the license authorization in Item 9, A and B, to read:

"For possession only in a Ronan Engineering Company Model SA-1 fixed gauging device incident to return to beneficial reuse or transfer to a specifically licensed person or disposal by a licensed waste broker/disposal company."

Please clarify if both gauging devices are being placed into storage. If not, please clarify whether Item 9.A., or Item 9.B., should remain on the license with continuing authorization for continued use. As a note, I see that one model authorizes a QSA Global, Inc., Model CDC.711, whereas the other device authorizes a Model CDC.711M. If your inventory records do not include the Source Model Number, you may be able to reach out to Ronan Engineering Company to clarify the source model designation as this information may be necessary to determine which device is to be placed in storage.

2. Your application identifies that you will ensure that the location of each fixed gauging device meets the criteria in Section 8.9, "Facilities and Equipment," in NUREG—1556, Volume 4, Rev. 1. This is also applicable to fixed gauging devices that are removed from installation and placed in storage. The fixed gauging device(s) must be secured to prevent unauthorized removal or access (e.g., located in a locked room). The fixed gauging device must also be stored with a lock inserted through the tab and the boss so as to secure the shutter in OFF position. Consideration should also be given to environmental conditions in the designated storage location. For example, the gauging devices should not be stored adjacent to explosives, flammable materials or caustic solutions and should not be stored in areas where water could pool around the gauging device. Review the applicable Conditions of Normal Use and Limitations and/or Other Considerations of Use specified in the Sealed Source & Device Registry Sheet, which you may obtain from the manufacturer/distributor of the gauging device. If you elect to return these gauging devices to beneficial reuse, I recommend that the device be re-evaluated by the manufacturer/distributor for continued use if the device is approaching or has exceeded the recommended working life of 15 years. You should request a license amendment before placing the gauging device back into operation. As this item is only advisory, no specific response is necessary or required.

3. Your revised application does not include the Device Model Number on page B-1. Please confirm that you are requesting the addition of two (2) Berthold Model LB 300 ML Series or LB 300 MLT Series fixed gauging devices for level measurements. Each device containing a Berthold Model P 2608-100 Sealed Source with a maximum activity of 10 millicuries each. Total activity not to exceed 20 millicuries.

4. Your revised application also appears to make reference to your existing authorization for three (3) LB 300 IRL ML Type II Series fixed gauging devices. I noted that the maximum activity was modified from 6 millicuries to 8 millicuries each. Though, the total activity of 18 millicuries was unchanged. As the total activity was unchanged, the changed in

the authorized activity for each device appears to be a typographical error. Please clarify if you are requesting a change in the authorized activity for each device from 6 millicuries to 8 millicuries.

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