

From: [Shafley, Wendy \(WK\)](#)
To: [Forster, Sara](#)
Subject: [External_Sender] RE: License # 21-35538-01 Question
Date: Monday, August 05, 2019 7:00:55 AM
Attachments: [image001.png](#)
[image003.png](#)

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Thank you, Sara! That is very helpful!

Thank you,

Wendy K Shafley

IH / H&S Specialist



Ph. - 989-638-7523

Pager - 989-253-0037

Midland, MI

From: Forster, Sara [mailto:Sara.Forster@nrc.gov]
Sent: Friday, August 02, 2019 2:20 PM
To: Shafley, Wendy (WK) <WKShafley@dow.com>
Subject: RE: License # 21-35538-01 Question

This email originated from outside of the organization.

Dear Ms. Shafley:

Thank you for your inquiry. I wanted to clarify that the Condition No. 16.A. does not necessarily require a shutter check every 6 months; it reads:

"Each gauge shall be tested for the proper operation of the on-off mechanism (shutter) and indicator, if any, at intervals not to exceed 6 months or at such longer intervals as specified in the certificate of registration issued by the U.S. Nuclear Regulatory Commission pursuant to 10 CFR 32.210 or the equivalent regulations of an Agreement State."

So, if the Sealed Source and Device Registry (SSDR) certificate allows for an annual shutter check, that would be acceptable. Annual shutter check frequencies are very common for certain fixed gauges, although I have not recently checked the SSDR for requirements specific to your license. In addition, sometimes the intervals allowed between shutter checks can be even longer, such as every 3 years. If you do not have a copy of the SSDR certificate, you should be able to get a copy from the gauge manufacturer to verify the allowed shutter-check frequencies.

Hopefully this is helpful. Please do not hesitate to contact me if you have any additional questions.

Sincerely,

Sara A. Forster, Health Physicist Licensing Reviewer

U.S. Nuclear Regulatory Commission - Region III

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From: Shafley, Wendy (WK) <WKShafley@dow.com>

Sent: Wednesday, July 31, 2019 10:37 AM

To: Forster, Sara <Sara.Forster@nrc.gov>

Subject: [External_Sender] License # 21-35538-01 Question

Sara,

I received our license in the mail and I have fully reviewed it. I do have one question:

Item 16A. Indicates that the shutter must be tested every 6 months. We did request an annual shutter check due to the down time costs. Is there any way that we could get an annual shutter check, or is this the NRC final answer?

Thank you, for your consideration!

Wendy X Shafley

IH / H&LS Specialist



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Midland, MI