

**Wheeling Pittsburgh**  
STEEL CORPORATION

July 18, 1985

U. S. Nuclear Regulatory Commission  
Region I  
631 Park Avenue  
King of Prussia, PA 19406

Attn: Mr. F. M. Castello

Re: MONESSEN BLOOM CASTER  
NRC LICENSE NO. 47-16875-02  
AMENDMENT REQUEST - URGENT

Gentlemen:

Pursuant to your letter of July 10, 1985 and our conversation of July 16, we are herewith requesting an amendment to our License No. 47-16875-02 to authorize Wheeling-Pittsburgh Steel Corporation's personnel to routinely handle the licensed devices. Due to the specific nature of the continuous casting process, the extent of the handling will involve routine procedures.

The mold level system, of which the licensed devices are an integral part, requires that the devices be removed routinely from the molds and either replaced into a reconditioned mold or placed in a locked, labeled adjacent box for security purposes. Removal may be required for the following reasons:

- a. Mold changes.
- b. Specific maintenance activities of the mold areas.
- c. Security reasons.
- d. Emergency conditions at the facility.
- e. Returning the unit for repair or disposal to either the manufacturer or a qualified licensed representative.

The programs instituted during the handling are listed below and are elaborated in the attachments. Summaries of these procedures to be utilized are:

1. Insertion of the device into the molds.
2. Operation of the device prior to and at the completion of the casting process.
3. Removal of the devices from the molds and/or storage of the units.

**"OFFICIAL RECORD COPY"**

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REG1 LIC30  
47-16875-02 PDR

DUVALL CENTER, WHEELING, WV 26003

RECEIVED  
FEDERAL EXPRESS

'85 AUG -2 P1:03

U.S. N.R.C.  
LIC. FEE MGMT. BRANCH

Applicant	August 3 - 4
Check No.	4121
Amount Due	\$60.00 (30)
Type of Fee	Amend
Date Check Recd.	8/2/85
Received By	J. J. J.

04134

JUL 20 1985

ML10

MONESSEN BLOOM CASTER  
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AMENDMENT REQUEST

4. Radiation detection equipment.
5. Training of the qualified individuals.

The above programs were developed with the assistance of the manufacturer's representative during startup of the facility. Radiation surveys of the devices and precautionary programs for the involved employees during the actual removal and handling of the units have revealed very minimal exposures; i.e., well below regulatory limits.

We trust the attached explanation of our programs and measures taken will allow us to be granted this amendment request. This amendment will allow Wheeling-Pittsburgh to routinely handle the units due to the specific nature of the continuous casting process as described in the attachments.

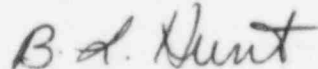
Since the inception of our program, Wheeling-Pittsburgh Steel has followed and will continue with safe working procedures to ensure that the proper handling of the devices will maintain exposures to as low as possible. Due to the nature of the operation, it is impossible to have an outside "qualified" contractor available to perform this activity, and it is cost prohibitive to our Corporation.

We hope that a decision can be made on this request in the near future, since without the use of the device the quality of the product produced will be affected.

We have also enclosed our check in the amount of \$60.00, payable to the Nuclear Regulatory Commission, in accordance with 170-12 of 10 CFR Part 170.

If you have any questions, feel free to contact us at 304/234-2672.

Very truly yours,



B. L. Hunt  
Industrial Hygienist, II  
Environmental Control

BLH/ng  
Attachments

ATTACHMENT I  
INSERTION OF SOURCE DEVICES INTO MOLDS

NOTE: These procedures are used routinely.

1. Qualified maintenance and/or operating individuals will unlock the security box and inspect the mold device cavity for foreign material prior to insertion.
2. Verify that all lifting handles are securely attached to the units which also will insure that the shutters are in the "LOCKED" "CLOSED" mode. This is a design feature of the units.
3. Install a designated 3/8" cable and clevis to the device lifting lug and direct the overhead crane to lift and transport the device to the designated mold.
4. Direct the crane to lower the device into the appropriate mold cavity and insure proper placement within the mold.
5. Remove the lifting handles from the devices and return them to the security box.
6. Repeat above procedures for the remainder of the units.

7/18/85

ATTACHMENT II

OPERATION OF THE DEVICE PRIOR TO AND AT THE  
COMPLETION OF THE CASTING PROCESS

NOTE: These procedures are used routinely.

1. Under the direction of a qualified operating supervisor, qualified individuals will rotate the shutter control knob to the "OPEN" position.
2. Verify that the shutter is "Open" by viewing the Mold Level control indicator on the control panel. This meter should read at the 50 millimeter position.
  - a. If the meter does not read to the specific position, immediately rotate the control knob to the "Closed" position and contact a maintenance supervisor.
  - b. The qualified maintenance supervisor will "open" the shutter and lower the survey meter into the mold to determine if the detection system of the mold is functioning properly or the indicator panel is defective.
  - c. If the device shutter is determined to be at fault, the shutter will be "closed" and the unit removed with the locking lifting handle to insure the shutter is in the "closed" position and return to the security box for repair by a qualified Berthold representative or the manufacturer.
3. Replace the access cover plate on the mold.
4. At the completion of the casting process, under direction, the shutter will be rotated to the "CLOSED" position.

ATTACHMENT III

REMOVAL OF THE SOURCE DEVICE FROM THE MOLDS  
AND STORAGE OF THE UNITS

NOTE: This procedure would be utilized during removal for storage, repair, security or emergency conditions that may jeopardize the units.

- (1) Under direction of the qualified operator/supervisor, the operator will remove the access covers.
- (2) Rotate the shutter control knob to the "CLOSED" position.
  - a. If the units are to be secured until the the next casting cycle, the security bar is placed across all five access covers and locked. This limits access to all of the source devices.
  - b. If the units are to be removed due to the nature of the operation or emergency conditions, the following will apply:
- (3) The lifting handles are securely attached to the units. This also locks the shutter control knob into the "CLOSED" position.
- (4) The maintenance foreman will obtain the calibrated survey meter. (See Attachment IV) The probe of the survey meter is inserted into the mold to insure that the shutter is in the CLOSED position and to verify that the panel meter is operational. This procedure is also employed during internal inspections of the mold to insure that the shutter is in the "CLOSED" position.

NOTE: If the situation is encountered where the shutter is not operational; i.e., not opening, then the unit is removed according to procedures and returned to the security box for service by an outside qualified representative.

- (5) Attach the 3/8" lifting cable and clevis to the handle.
- (6) Direct the overhead crane to lift the unit out of the mold and travel to the security box.
- (7) Repeat the above steps for the remaining devices.
- (8) Lock the labeled\* security box.

\*Security box identified with the following: "CAUTION-RADIOACTIVE MATERIALS."

7/18/85

WPSC

LICENSE NO. 47-16875-02

ATTACHMENT IV

RADIATION DETECTION EQUIPMENT

The Monessen Caster Complex has available three (3) Ludlum Radiation Survey Meters. The three units consist of the following:

1. One (1) Model 14C with a Model 44-7-GM probe.
2. Two (2) Model 5 Meters.

These units are used by the qualified operating personnel to verify that the shutters are in the "CLOSED" position prior to removing the units and by the RSO to conduct area assessments.

The instruments are sent to Applied Health Physics at least annually for the required calibration and maintenance procedures.

7/18/85

WPSC

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ATTACHMENT V

TRAINING OF QUALIFIED OPERATORS

All qualified supervisors and operators have received training in basic radiation safety by Ronan Engineering Company. These operators and details of the training were specified in our license application dated October 18, 1982 and our Amendment request of July 25, 1983.

In addition to the previous training, they have received specific training by Berthold's authorized field personnel during startup of the facility. During this on-site training, the detailed safe handling and operating procedures were developed and were summarized in previous attachments. These were also referred to in our license application of October 18, 1982.

7/18/85

BETWEEN: William O. Miller, Chief  
License Fee Management Branch  
Office of Administration

John E. Glenn, Chief  
Nuclear Materials Section B  
Division of Engineering and  
Technical Programs

OK  
8/17/85

LICENSE FEE TRANSMITTAL

A. REGION I

1. APPLICATION ATTACHED

Applicant/Licensee:

Wheeling-Pittsburgh Steel Corp.

Application Dated:

7-18-85

Control No.:

04134

License No.:

47-16875-02

2. FEE ATTACHED

Amount:

\$60.00

Check No.:

4121

3. COMMENTS

Signed

SLJ

Date

7-23-85

03120

B. LICENSE FEE MANAGEMENT BRANCH

1. Fee Category and Amount:

3P - \$60

12/87

2. Correct Fee Paid. Application may be processed for:

Amendment

✓

Renewal

License

Signed

Jo Jackson

Date

8/17/85