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00121 COW CORNING MIDLAND FLT 4-29-85

MR. BRUCE MALLET
U.S. NUCLEAR REGULATORY COMMISSION
REGION III
799 ROOSEVELT ROAD
GLEN ELLYN, IL 60137

Applicant: *May 7, 1985*
Check No. *267018*
Amount: *\$230.00* -3F
Type of Fee: *General*
Date Check Rec'd: *8/13/85*
Received by: *[Signature]*

SUBJECT: NRC LICENSE NO. 21-08362-13

CONTROL NO. 78847

DEAR MR. MALLET:

CURRENTLY, THE REFERENCED LICENSE REQUIRES US TO WIPE AND PRESSURE TEST OUR COBALT-60 SOURCE ANNUALLY. THE TIME FOR THIS TESTING IS UPON US.

THIS YEAR WE HAD MADE ARRANGEMENTS TO MAKE THE COBALT-60 SOURCE MOVE BETWEEN OUR UNDERGROUND REACTOR AND CAVES FOR BOTH TESTING AND REPLENISHING DEPLETED COBALT-60 AT THE SAME TIME. WE MADE ARRANGEMENTS TO DO THIS SO THAT WE WOULD ONLY HAVE TO HANDLE THE SOURCE ONCE.

UNFORTUNATELY, THIS IS NOT POSSIBLE BECAUSE OUR VENDOR, NEUTRON PRODUCTS, HAS BEEN PLACED IN A POSITION WHERE THEY CANNOT SHIP US OUR MATERIAL. APPARENTLY, THE NRC HAS REQUESTED, FOR REVIEW, DRAWINGS AND SPECIFICATIONS ON THE CASK IN WHICH NEUTRON PRODUCTS WOULD HAVE SHIPPED US OUR COBALT-60. UNTIL THIS REVIEW IS COMPLETE, THE NRC HAS ASKED THAT NEUTRON PRODUCTS NOT SHIP ANY MATERIAL USING THAT CASK.

UNFORTUNATELY THIS HAS PLACED US IN A POSITION WHERE WE MAY NOT BE ABLE TO DO BOTH THE ANNUAL SOURCE TEST AND REPLENISHMENT AT THE SAME TIME UNLESS WE RECEIVE AN EXEMPTION.

WE WOULD LIKE TO REQUEST A ONE-TIME EMERGENCY EXEMPTION TO POSTPONE THE WIPE AND PRESSURE TESTING OF OUR COBALT-60 SOURCE FOR NO MORE THAN THREE MONTHS, OR UNTIL NEUTRON PRODUCTS CAN SEND US OUR NEW COBALT-60, WHICHEVER COMES FIRST. NEUTRON PRODUCTS INFORMS US THAT THE REVIEW BY THE NRC IS CURRENTLY IN PROGRESS AND SHOULD BE COMPLETED SHORTLY, ALTHOUGH THEY DO NOT HAVE A DEFINITE DATE. WE FEEL THIS EXEMPTION IS APPROPRIATE BECAUSE IT WILL ALLOW US TO MOVE THE SOURCE ONLY ONCE TO DO BOTH TESTING AND REPLENISHING. WE FEEL IT IS FAR SAFER TO MOVE THE SOURCE ONCE, RATHER THAN THE TWO TIMES WE WOULD BE FORCED TO DO IF THIS EXEMPTION WERE NOT GRANTED. WE FEEL THAT MOVING THE SOURCE ONLY ONCE, BY ALLOWING US THIS EXTENSION FOR WIPE AND PRESSURE TESTING, IS MEETING THE PHILOSOPHY OF KEEPING EXPOSURES AS LOW AS REASONABLY ACHIEVABLE.

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WE HOPE YOU WILL LOOK FAVORABLY ON THIS EXEMPTION REQUEST,
IF YOU HAVE ANY QUESTION, PLEASE CONTACT ME.

SINCERELY,

JOHN T. HIGGINS
RADIATION SAFETY OFFICER
(517) 496-4065

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