

NOV 29 1984

North Star Steel Company
ATTN: Richard T. Sipole
Safety and Security Manager
P. O. Box 1200
3000 East Front Street
Monroe, MI 48161

Re: Letter dated September 25, 1984, for Renewal of License 21-18673-01

Gentlemen:

We have reviewed your letter for renewal of your license, and find we need the following additional information:

1. Submit list of the Radiation Protection Officers' duties and responsibilities. Typical duties and responsibilities of a Radiation Protection Officer are listed in Item 7 of the enclosed guide for non-portable gauges.

The Radiation Protection Officer should also serve as a point of contact and give assistance in case of emergency (device damage, fire, theft, etc.) and to ensure that proper authorities, (for example, NRC, local police, and State personnel) are notified promptly in case of accident or damage to the devices. The Radiation Protection Officer should ensure that a physical inventory is performed every six (6) months to account for all sealed sources received and possessed under the license.

2. Describe the method used to control access to the gauge and method to prevent individuals from interposing a limb between the source and the vessel (e.g., barriers, fencing, cage around the gauge, posting and warning signs, etc.).
3. It appears that the gauges will be in an unfavorable environment. Describe your methods to ensure each gauge will be kept within the manufacturer's specified temperature and other environmental limits such that the shielding and shutter mechanism of the source holder is not compromised.
4. Submit a annotated sketch (please, don't send blue prints) and description of your storage area(s). Describe the areas adjacent to your storage area(s). Describe how you will prevent unauthorized access to stored gauges.
5. Please submit a simple annotated sketch or drawing showing where each device is installed and the location of adjacent ladders, aisles, or work areas employees will occupy.

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6. Your application states that the procedure for gauge installation is the reverse of the procedure for gauge removal. It is not clear if you perform radiation surveys of the area with the source in the "on" or "unshielded" position after a gauge is installed. Please clarify.
7. Please describe the method used to monitor (e.g., film badges) personnel who will be removing, relocating, and installing gauges.
8. Please provide a description of the location(s) where radiation measurements are taken when gauges are removed or installed. Also, please give a description of the record that will be maintained containing the survey results.
9. Describe your method to verify that a gauge has been successfully "locked-out". For example, radiation survey, checking the associated electronics to verify that the radiation beam has been terminated, as well as verifying that mechanical controls are secured (locked) in the "off/safe" position.
10. Describe the training given to gauge operators informing them that any maintenance on gauges involving dismantling, removal, of the source holder(s), etc., must not be performed by the operator, but only performed by authorized individuals.
11. It is not clear if you wish Richard Sipole to remove, relocate, and install gauges only at the Monroe Michigan facility, or if you wish Mr. Sipole to be authorized to also perform these services at the St. Paul, Minnesota, and Wilton, Iowa facilities. Please clarify.

We will continue our review of your application upon receipt of this information. Please reply in duplicate within 30 days, and refer to Control 18197.

Sincerely,

Original Signed
William P. Reichhold
Materials Licensing Section

Enclosure: Guide for non-portable
gauges

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11/23/84