



July 28, 2021

To: Jonathan B. Pfingsten
Division of Radiological Safety and Security
2100 Renaissance Boulevard, Suite 100
King of Prussia, PA 19406-2713

SUBJECT: Request for additional information regarding ECD devices and training requirements.

Dear Mr. Pfingsten,

This letter is to confirm that No ECD repair or maintenance by the licensee is proposed or requested and the source or foil is not removed from the detector cell.

A handwritten signature in black ink, appearing to read 'Nicole Newell', with a stylized, cursive script.

Nicole Newell, Plant Manager III

The Chemours Company
8480 Dupont Road
Washington, WV 26181

NICOLE.T.NEWELL@CHEMOURS.COM

304-863-4305

REC RG 108 10 21 AM 11:07



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION I
2100 RENAISSANCE BLVD.
KING OF PRUSSIA, PA 19406-2713

July 28, 2021

Nicole Newell, Plant Manager
The Chemours Company
8480 DuPont Road
Washington, WV 26181

SUBJECT: THE CHEMOURS COMPANY, REQUEST FOR ADDITIONAL INFORMATION,
MAIL CONTROL NO. 627325

Dear Ms. Newell:

This is in reference to your letter dated June 2, 2021, requesting to amend NRC License No. 47-35235-01. In order to continue our review, we need the additional information requested below. Please be aware that guidance concerning programs utilizing electron capture detectors (ECD), such as those used in gas chromatographs or chemical agent detection or monitoring instruments, may be found in Appendix C of NUREG-1556, Volume 7, Revision 1, "Consolidated Guidance About Materials Licenses: Program-Specific Guidance About Academic, Research and Development, and Other Licenses of Limited Scope, Including Electron Capture Devices and X-Ray Fluorescence Analyzers". The document may be found at <https://www.nrc.gov/reading-rm/doc-collections/nuregs/staff/sr1556/v7/index.html>.

1. For awareness only, no response needed - Your license authorizes two models of gas chromatography devices; each model may be possessed under a general license. In accordance with the letters dated June 3, 2015, (ML15189A123) and June 22, 2015, (ML15203A061) your organization requested that these devices be specifically licensed. As such, they have been specifically licensed since the initial issuance of your license issued June 26, 2015 (ML15205A107).
2. As stated in NUREG-1556, Volume 7, Revision 1, if the applicant does not propose ECD repair or maintenance, then no specific training and experience in using and handling radioactive materials is necessary for individuals who will use the device(s) or supervise their use. No special training or experience is needed to perform leak tests using a leak test kit or to clean detector cells used in ECD devices, provided the source or foil is not removed from the detector cell.

As such, please provide either of the following:

- a. Provide proof of training for the proposed RSO for ECD repair or maintenance and conduct of ECD leak tests; OR
- b. Confirm both of the following:
 - i. No ECD repair or maintenance by the licensee is proposed or requested;
AND
 - ii. The source or foil is not removed from the detector cell, thus no special

THE CHEMOURS COMPANY, REQUEST FOR ADDITIONAL INFORMATION, MAIL
CONTROL NO. 627325 DATED JULY 28, 2021

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SUNSI Review Complete: Jonathan Pfingsten

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