

From: [Erin Kennedy](#)
To: jason.green@clevelandcliffs.com
Cc: [Ryan Craffey](#)
Subject: Renewal of NRC Materials No. 21-26151-01
Date: Thursday, October 13, 2022 8:51:00 PM
Attachments: [image001.png](#)
[Fixed Gauge RENEWAL form extra page.pdf](#)
[Form313.pdf](#)
[Cleveland-Cliffs Steel Corporation.pdf](#)
[Delegation of Authority.docx](#)

Good Evening Jason,

Thank you again for taking the time to meet with me this afternoon. Below is the email that I originally sent to Garret regarding the renewal of your materials license. As Garret is no longer with your company, I will need you to resubmit your renewal application in order to move forward with your request. Please submit the following information:

1. A signed and dated NRC form 313 (attached)- This form should be signed by a duly authorized representative. Examples of acceptable representatives include senior managers who are responsible for oversight of the radiation safety program or the Radiation Safety Officer (RSO) who is already specifically named on the license.
2. For your convenience and the streamlined handling of fixed gauge applications, you may use Appendix B, "Suggested Format for Providing Information Requested in Items 5 through 11 of NRC Form 313," to [NUREG 1556 Vol. 4 rev. 1](#) to provide supplemental information. I have attached a fillable PDF copy of this checklist to this email. If you choose to use this checklist, please note that we will need the following information:

For Items 5 and 6 provide:

- Each radionuclide and maximum activity of each source per gauge model, and confirmation that the activity per source and maximum activity per gauge will not exceed the maximum activity listed in the approved certificate of registration issued by the NRC or by an Agreement State.
- Manufacturer (or distributor) and model number for each type of gauge.
- Maximum number of gauges to be possessed and used under the license, by manufacturer and model number.
- Purpose for which the gauges will be used, such as "to measure physical properties of materials," and confirmation that all gauges will be used as listed in accordance with the applicable and approved certificate of registration issued by the NRC or by an Agreement State.

For Item 10.8 please note:

- There are **two** checkboxes in this section, one for Routine Cleaning and Operation and one for Nonroutine Maintenance. You will need to make a selection for each.
3. In order to proceed with your application you will need to name a new Radiation Safety Officer. You will need to provide:
 - the name and contact information for the proposed individual

documentation demonstrating the proposed RSO's training and experience. Acceptable training and experience is described in Appendix D of NUREG 1556 Vol. 4 rev. 1 (see link above)

- Documentation confirming that the proposed individual is duly authorized for and accepts the responsibility of being appointed as the RSO. This may be met by providing a copy of the Delegation of Authority memo formally appointing the new RSO, signed by both the new Radiation Safety Officer and their senior management responsible for oversight of the radiation safety program. A sample Delegation of Authority memo is attached to this email.

Please submit your application and supporting documentation by close of business on Friday October 28, 2022. If you have any additional question, please feel free to give me a call in my office 630-829-9876 or my cell phone 505-699-3675.

Thank you,

Erin Kennedy

U.S. Nuclear Regulatory Commission, Region III
Health Physicist- Materials Licensing
Email: erin.kennedy@nrc.gov
Office: 630-829-9876

From: Erin Kennedy
Sent: Friday, September 30, 2022 3:20 PM
To: garret.salomon@clevelandcliffs.com
Subject: Renewal of NRC Materials No. 21-26151-01

Good Afternoon Garret,

I left you a message today regarding the renewal of NRC Materials No. 21-26151-01, and I wanted to follow up with an email. Several of the standard commitments were omitted from your renewal request, and your application includes your Site Specific Radiation Procedures which are potentially overly restrictive. Please either resubmit your application without these procedures; or indicate that you agree to leave these documents as-is and that you understand that by doing so the procedures will become legally binding and enforceable. If you choose to resubmit, please include the following:

1. Please provide a complete NRC form 313 (attached).
2. For your convenience and the streamlined handling of fixed gauge applications, you may use Appendix B, "Suggested Format for Providing Information Requested in Items 5 through 11 of NRC Form 313," to [NUREG 1556 Vol. 4 rev. 1](#) to provide supplemental information. I have attached a fillable PDF copy of this checklist to this email. If you choose to use this checklist, please note that we will need the

following information:

For Items 5 and 6 provide:

- Each radionuclide and maximum activity of each source per gauge model, and confirmation that the activity per source and maximum activity per gauge will not exceed the maximum activity listed in the approved certificate of registration issued by the NRC or by an Agreement State.
- Manufacturer (or distributor) and model number for each type of gauge.
- Maximum number of gauges to be possessed and used under the license, by manufacturer and model number.
- Purpose for which the gauges will be used, such as "to measure physical properties of materials," and confirmation that all gauges will be used as listed in accordance with the applicable and approved certificate of registration issued by the NRC or by an Agreement State.

For Item 10.8 please note:

- There are **two** checkboxes in this section, one for Routine Cleaning and Operation and one for Nonroutine Maintenance. You will need to make a selection for each.

If you choose not to resubmit your renewal request, I will need additional information regarding several standard license commitments, and we will need to schedule a meeting to address the deficiencies as soon as possible.

If you choose to resubmit, please documentation by close of business on Friday October 14, 2022. If you have any additional question, please feel free to give me a call in my office 630-829-9876 or my cell phone 505-699-3675.

Thank you,

Erin Kennedy

U.S. Nuclear Regulatory Commission, Region III

Health Physicist- Materials Licensing

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