



Defense Threat Reduction Agency

8725 John J Kingman Road MS 6201
Ft Belvoir, VA 22060-6201

MAR - 1 2005

U.S. Nuclear Regulatory Commission
Attention: Mr. Bryan Parker
Division of Nuclear Materials Safety, Region I
475 Allendale Road
King of Prussia, PA 19406

Reference: License Amendment Request (License No. 45-25551-01) 03035668

Dear Mr. Parker:

This letter is a request to amend the above referenced license to revise the radiation safety training program to replace our current license commitments from item 8 of the original application dated February 2, 2001. (Attachment A)

If there are any questions or additional information needed, please contact Mr. Robert Burkhart, Certified Health Physicist at (505) 853-2160.

Sincerely,

Richard T. Hartman, Ph.D., CIH, CSP
Chief, Environment, Safety and
Occupational Health Division (BDS)

Enclosures:
As stated

05 MAR - 8 11:55

RECEIVED
REGION I

136582
NMSS/RGNI MATERIALS-002

ITEM 8
TRAINING FOR INDIVIDUALS WORKING IN OR FREQUENTING
RESTRICTED AREAS
(INSTRUCTIONS TO OCCUPATIONAL WORKERS
AND ANCILLARY PERSONNEL)

Training Program

Training will be provided:

- Before an employee assumes duties with or in the immediate vicinity of radioactive materials
- At least annually, as refresher training for all included employees
- Whenever a significant change occurs in duties, regulations or the terms of the NRC license

Type of instruction:

- Instruction in the radiation safety program and NRC regulatory requirements may be in the form of lecture, demonstrations, videotape, or self-study, and will emphasize practical subjects important to the safe use of radioactive materials.
- Individuals receiving instructions will be provided an opportunity to ask questions.

Records of initial and refresher training will include:

- Name of individual who provided the instruction
- Names of the individuals who received the instruction
- Date and time of instruction
- List of topics covered

Personnel to be included in training program:

- Individuals to be assigned duties as site-RSO at DTRA satellite locations
- Team Leaders/Authorized Users for START Treaty inspections (²⁴¹Am-Li source/s identified in Item 5A)
- Team Leaders/Authorized Users for PINS systems (²⁵²Cf sources identified in Item 5B)
- Radiological Worker I/II for DOD installations, FUDS and temporary job sites (sources identified in Items 5C - 5J)
- Individuals working in vicinity of radioactive materials to include ancillary personnel (i.e., warehouse personnel, mailroom personnel, etc.)

ITEM 8
TRAINING FOR INDIVIDUALS WORKING IN OR FREQUENTING
RESTRICTED AREAS (continued)

Training Requirements

Before allowing an individual to access the restricted area unsupervised or to perform work with radioactive materials unsupervised, the DTRA RSO will ensure that he or she has sufficient training and experience. The training requirements vary for the different categories of radioactive material users. Documentation of training will be maintained.

Individuals Assigned Duties as Site-RSO at DTRA Satellite Locations

Under the supervision of, and following approval by, the DTRA RSO, site-RSOs are responsible for implementing the DTRA radiation safety program at satellite locations both within the U.S. and abroad. They are responsible for the safety aspects governing the use, storage, transportation, monitoring and surveying, wipe testing and emergency response of radionuclides in their possession and for ensuring compliance with the DTRA procedures, NRC regulations and license conditions. Minimum training for site-RSOs is as follows:

- Radiation Safety Course (40 hours)
- DTRA Radiation Safety and Transportation Course (8 hours)

Team Leaders/Authorized Users for START Treaty inspections (²⁴¹Am-Li identified in Item 5A)

Team Leaders/Authorized Users will be knowledgeable of the type(s) of radioactive material being handled and will also be familiar with the associated hazards and emergency procedures to follow in the event of an accident. Team Leaders/Authorized Users are responsible for the safety aspects governing the use, storage, transportation, monitoring and surveying, wipe testing and emergency response of radionuclides in their possession during the mission and for ensuring compliance with the DTRA procedures, NRC regulations and license conditions. The Team Leaders/Authorized Users are also responsible and for notifying the Host Installation of the presence of the ²⁴¹Am-Li source, identifying suitable storage facilities and ensuring the radioactive sources are properly safeguarded at all times and that only authorized personnel are afforded access. Minimum training for START Team Leaders/Authorized Users is as follows:

- DTRA Radiation Safety and Transportation Course (8 hours)
- RDE Operators Course (40 hours) to include at least 8 hours of Am-241/Li specific radiation safety training

ITEM 8
TRAINING FOR INDIVIDUALS WORKING IN OR FREQUENTING
RESTRICTED AREAS (continued)

Training Requirements (continued)

Team leaders/Authorized Users for PINS systems (²⁵²Cf identified in Item 5B)

Team Leaders will be knowledgeable of the type(s) of radioactive material being handled and will also be familiar with the associated hazards and emergency procedures to follow in the event of an accident. Team Leaders are responsible for the safety aspects governing the use, storage, transportation, monitoring and surveying, wipe testing and emergency response of radionuclides in their possession during the mission and for ensuring compliance with the DTRA procedures, NRC regulations and license conditions. The Team Leaders are also responsible and for notifying the Host Installation of the presence of the PINS source, identifying suitable storage facilities and ensuring the radioactive sources are properly safeguarded at all times and that only authorized personnel are afforded access. Minimum training for PINS Team Leaders is as follows:

- DTRA Radiation Safety and Transportation Course (8 hours)
- PINS Operators Course (32 hours) to include at least 8 hours of Cf-252 specific radiation safety training

Radiological Worker I/II for DOD installations, FUDS and temporary job sites (sources identified in Items 5C - 5J)

Radiological Worker I/II job duties involve entry into Radioactive Material Areas, Radiation Areas, High Radiation Areas, Contamination Areas and High Contamination Areas. Workers will be knowledgeable of the type(s) of radioactive material being handled and will also be familiar with the associated hazards and emergency procedures to follow in the event of an accident. Minimum training for Radiological Worker I/II is as follows:

- Radiation Worker I/II Course (20 hours)
- DTRA Radiation Safety and Transportation Course (8 hours)

Individuals working in the vicinity of radioactive materials

Individuals working in the vicinity of radioactive materials may be responsible for controlling access into restricted areas. They will be familiar with the safety hazards and emergency procedures for the radioactive sources covered by this application. Minimum training for individuals working in the vicinity of radioactive materials is as follows:

- Basic Radiation Safety Awareness Course (1.5 hour)

ITEM 8
TRAINING FOR INDIVIDUALS WORKING IN OR FREQUENTING
RESTRICTED AREAS (continued)

Topics Covered in Training Courses

Radiation Safety Course (40 hours)

Topics include: principles and practices of radiation protection, radiological monitoring techniques, biological effects of radiation and applicable Federal regulations. The course also provides instruction on radiation detection instrumentation to include operation, calibration and limitations and mathematics to perform calculations basic to the use and measurement of radioactivity. Successful completion of the course includes a passing score on a written exam of the topics presented.

Given by: U.S. Army Chemical School or equivalent

PINS Operators Course (32 hours)

Topics include: PINS system operation, neutron radiation theory, assembly & disassembly of systems components. This course also includes at least 8 hours of instruction covering principles and practices of radiation protection, interaction with matter, biological effects of radiation and risk, ALARA principle, contamination prevention and theory and use of DTRA-specific radiation detection instrumentation. Successful completion of the course includes a passing score on a written exam of the topics presented.

Given by: Idaho National Engineering and Environmental Laboratory

RDE Operators Course (START (32 hours)

Topics include: RDE system operation, neutron radiation theory, assembly & disassembly of systems components. This course also includes at least 8 hours of instruction covering principles and practices of radiation protection, interaction with matter, biological effects of radiation and risk, ALARA principle, contamination prevention and theory and use of DTRA-specific radiation detection instrumentation. Successful completion of the course includes a passing score on a written exam of the topics presented.

Given by: Patrick AFB

DTRA Radiation Safety and Transportation Course (8 hours)

Topics include: DTRA-specific radiation safety procedures, applicable Federal regulations, procedures, policy and responsibilities to ensure maximum safety in the use, handling, transportation and storage of radioactive material used at DTRA. Transportation session topics include current requirements and procedures to transport and ship radioactive material or prepare radioactive material for transportation through approved methods and techniques of the DOT and other regulatory agencies. This course gives demonstration through practical application the proper setup and use of radiation detection equipment and performance of a radiation survey. Successful completion of the course includes a passing score on a written exam of the topics presented.

Given by: Radiation Safety Officer (or designee) at DTRA

ITEM 8
TRAINING FOR INDIVIDUALS WORKING IN OR FREQUENTING
RESTRICTED AREAS (continued)

Topics Covered in Training Courses (continued)

Radiation Worker I/II Course (20 hours)

Topics include: principles and practices of radiation protection, protective measures associated with the job, dosimetry units, ALARA policy, precautions when entering controlled areas, site specific radiation safety practices and applicable Federal regulations. The course also provides instruction on characteristics, quantities and type(s) of radioactive material being handled and the associated hazards and emergency procedures to follow in the event of an accident. Successful completion of the course includes a passing score on a written exam of the topics presented.

Given by: Bechtel Nevada Radiological Control or equivalent

Basic Radiation Safety Course (1.5 hours)

Topics include: introduction to basic radiation terms and concepts, significance of the radiation symbol and its use on signs and labels, location of restricted and unrestricted areas, whether an individual is authorized access to the restricted areas. The selected topics for of personnel working in the vicinity of radioactive materials will be commensurate with the individuals' duties. Handouts will be provided without a written exam.

Given by: Radiation Safety Officer (or designee) at DTRA

This is to acknowledge the receipt of your letter/application dated

3/11/2005, and to inform you that the initial processing which includes an administrative review has been performed.

☒ Amendment 45-25551-01 There were no administrative omissions. Your application was assigned to a technical reviewer. Please note that the technical review may identify additional omissions or require additional information.

☐ Please provide to this office within 30 days of your receipt of this card

A copy of your action has been forwarded to our License Fee & Accounts Receivable Branch, who will contact you separately if there is a fee issue involved.

Your action has been assigned **Mail Control Number** 136582.
When calling to inquire about this action, please refer to this control number.
You may call us on (610) 337-5398, or 337-5260.

BETWEEN: : (FOR LFMS USE)
 : INFORMATION FROM LTS
 : -----
 :
 License Fee Management Branch, ARM : Program Code: 03620
 and : Status Code: 0
 Regional Licensing Sections : Fee Category: EX 3M
 : Exp. Date: 20110430
 : Fee Comments: _____
 : Decom Fin Assur Req'd: N
 : ::::::::::::::::::::::::::::::::::::::

LICENSE FEE TRANSMITTAL

A. REGION I

1. APPLICATION ATTACHED

Applicant/Licensee: DEFENSE, DEPARTMENT OF
Received Date: 20050308
Docket No: 3035668
Control No.: 136582
License No.: 45-25551-01
Action Type: Amendment

2. FEE ATTACHED

Amount: /
Check No.:

3. COMMENTS

Signed
Date

[Signature]
3/10/05

B. LICENSE FEE MANAGEMENT BRANCH (Check when milestone 03 is entered /__/)

1. Fee Category and Amount: _____

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

Amendment _____
Renewal _____
License _____

3. OTHER _____

Signed
Date

