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29-30390-01

Docket No. 030-34438
Control No. 124469

Thomas D. Oglesby, Ph.D.
Vice President, Technical Operations
Taylor Technology, Inc.
107 College Road East
Princeton, NJ 08540

Dear Dr. Oglesby:

This is in reference to your application dated April 9, 1997 requesting a Nuclear Regulatory Commission License. In order to continue our review, we need the following additional information:

1. An individual must have prior experience of using licensed material in order to be approved as an authorized user. Your application does not state that Mr. Robert White has the experience of using licensed materials in unsealed form. Please describe his experience of using such materials. The description of the use of licensed materials should include the specific isotopes handled, the maximum quantities of materials handled, where the experience was gained, the duration of experience, and the type of use.
2. Provide a description or an organizational chart which shows that the Radiation Safety Officer has a direct reporting path to senior management.
3. Provide a copy of senior management's written statement of delegation of authority to the Radiation Safety Officer. This statement should include the requisite authority to communicate with and direct your personnel regarding NRC regulations and license provisions and to enforce these requirements including the ability to terminate any unsafe operation involving the use of licensed material.
4. You state on page 10 of your application that the Radiation Safety Officer, or his specific designee, will be responsible for maintaining all required records relating to radiation safety and regulatory compliance. Please note that the implementation of the radiation safety program and maintenance of all appropriate records is the responsibility of the Radiation Safety Officer. He/she may delegate certain tasks to others but can not delegate the responsibility. Submit a description of the duties and responsibilities of your Radiation Safety Officer. The typical duties of a Radiation Safety Officer would be:

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- a. To assess radiological hazards and prescribe, and ensure the implementation of, appropriate radiation safety precautions.
 - b. To ensure that the use of licensed material is by or under the direct supervision of individuals specifically listed on your license.
 - c. To ensure that all users (where appropriate) wear personnel monitoring equipment when using licensed materials.
 - d. To ensure that licensed materials are properly secured against unauthorized removal at all times when not in use.
 - e. To perform routine inspections of all laboratories using or storing licensed materials.
 - f. To ensure that the terms and conditions of your license are met, and that all required records are maintained.
5. Ancillary personnel (clerical, housekeeping, security, etc.) whose duties may require them to work in the vicinity of licensed material (whether escorted or not) need to be informed about radiation hazards and appropriate precautions. Outline your method to assure that these employees receive the necessary instruction. Please confirm that this instruction will be given both initially and annually thereafter on a refresher basis.
6. Please confirm that your survey instruments will be calibrated by an entity that is licensed by the NRC or an agreement state to perform these calibrations and that backup instruments will be available to replace instruments off-site for calibration.
7. Describe your criteria for release of facilities and equipment for unrestricted use. Please submit the following additional information:
 - a. results of surveys made for radiation levels in milliroentgen per hour (mR/hr) and of wipe test surveys made for removable contamination in disintegrations per minute per 100 square centimeters (dpm/100 cm²), and
 - b. the manufacturer, model number, and sensitivity of the survey instruments used to perform these measurements.
8. 10 CFR 20.1101(c) requires that the licensee review the radiation protection program content and implementation at least annually. Submit a description of your program for performing the required annual review. It should include the following criteria:

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- a. Senior management oversight of the radiation protection program. Specify the mechanisms that will be used by senior management to ensure that they are aware of NRC regulations, the provisions of the license, and the compliance status of the institution's licensed program.
- b. Review of the Radiation Safety Officer and staff performance. Specify the minimum qualifications for an individual who will perform this review, and confirm that the results will be reported to senior management.
- c. Audits by the Radiation Safety Officer and staff to determine user compliance with the requirements of the NRC license and your radiation protection program. Audits should include such topics as: reviews of users' inventory and survey records, evaluation of users' radiation safety procedures through observation and discussion, and performance of independent work area surveys.

We will continue our review upon receipt of this information. Please reply in duplicate to my attention at the Region I Office and refer to Mail Control No. 124469. If you have any technical questions regarding this deficiency letter, please call Dr. Sattar Lodhi at (610) 337-5364.

If we do not receive a reply from you within 30 calendar days from the date of this letter, we shall assume that you do not wish to pursue your application.

Sincerely,

ORIGINAL SIGNED BY:
JOHN D. KINNEMAN

John D. Kinneman, Chief
Nuclear Materials Safety Branch 2
Division of Nuclear Materials Safety

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Enclosures:
10 CFR Parts 19, 20, 30

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