
CONVERSATION RECORD

TIME | DATE
8-15-2007

☐ VISIT ☐ CONFERENCE ☒ TELEPHONE

☐ INCOMING
☒ OUTGOING

NAME OF PERSON(S) CONTACTED OR IN CONTACT	ORGANIZATION (OFFICE, DEPT. ETC.)	TELEPHONE NO.
Kathi Moss	Weyerhaeuser Company	989-348-3475
Assistant RSO Designate	Grayling, Michigan	FAX -3495

SUBJECT

Control No. 316278 - Re request by letter received May 29, 2007, to: 1) delete from the license, curium-244 and Americium-241 sealed sources used in SPECTRO Analytical Instruments Model 200 Series x-ray fluorescence analyzers for elemental analysis of process materials; 2) add Kathi Moss as a license RSO back up (Assistant Radiation Safety Officer); and 3) request to modify License Condition 13. B. (a standard license condition for fixed gauges specifying a 3 month leak test frequency for sealed sources designed to primarily emit alpha particles) to require a leak test frequency not to exceed 6 months.

SUMMARY

In the telephone conversation on this date with Ms. Moss, the following items were discussed:

1. For the sealed sources of Curium-244 and Americium-241, for use in SPECTRO Analytical Instruments Model 200 Series X-ray fluorescence analyzers:

- Provide documentation (including date of transfer) confirming that the Curium-244 and Americium-241 sealed sources, recently possessed by you, were transferred back to SPECTRO Analytical Instruments, Inc. and that none of these sources remain in your possession;
- Provide a copy of a document from SPECTRO Analytical Instruments, Inc. confirming their receipt of these sealed sources; and
- Provide a copy of a leak test record, current (within 36 months) as of the time of transfer, which confirms the non-leaking status of each source transferred; and
- Confirm that you have never in the past had any leaking sealed sources of Curium-244 and Americium-241, possessed for use in the SPECTRO Analytical Instruments Model 200 Series X-ray fluorescence analyzers, based on routine leak test data.

2. Regarding request to add Kathi Moss as a license RSO back up, I noted that it is not NRC's policy to designate more than one individual as having primary responsibility for radiation safety aspects of NRC licensed activities. If the Radiation Safety Officer (RSO) has the need for **assistance**, then the person(s) added to the license for this purpose should be titled "**Assistant Radiation Safety Officer**" and this individual(s) responsibilities should be limited to only acting for the Radiation Safety Officer for short periods of time in the absence of the RSO (i.e. sickness, vacations, etc.) and to report to the RSO upon his/her return, for the duties performed for the RSO. Therefore, if you wish to pursue this request, please confirm the following:

- Confirm that Kathi Moss will act as Assistant RSO's as described above (limited to only acting for the Radiation Safety Officer for short periods of time in the absence of the RSO (i.e. sickness, vacations, etc.);
- Confirm that the Assistant RSO will report to the RSO upon the RSO's return, regarding the duties performed for the RSO; and

c. Please provide a copy of an Assistant RSO/Management Agreement, or Letter of Understanding, signed by the respective Assistant RSO and a high level management representative, confirming the appointment of the individual, and also serving as confirmation of the appointee's knowledge and acceptance of the position with its duties and responsibilities. Also, please confirm your understanding of this RSO/Assistant RSO arrangement.

3. Regarding the request to modify a standard leak test condition as described above, I noted that it was not our policy to modify standard license conditions without proper justification. Further, I noted that the license condition in question does not currently impact the licensee in that it applies only to "sealed sources designed to primarily emit alpha particles" where as the only source/gauges currently authorized for use, by the licensee, are specified as "Gamma Gauges" in the Sealed Source and Device Registry. Therefore, I related that this requested change would not be granted.

4. Also, we are now required to place on a license as amended, a total possession limit for each radionuclide authorized on the license. Each of your LFE Corporation Model SU-S3 gauges is authorized to have up to 1000 millicuries of Am-241. Please specify the possession limit in millicuries of Am-241 that you need to be authorized for. Please note that this request can allow for some limited expansion of gauge usage to possibly preclude the need to amend the license, assuming the make and model of gauge is already authorized on your license. Please note that authorizing a possession limit below 16 curies of Am-241 precludes the need for implementing "Increased Control" measures and further, authorizing a possession limit below 1.6 curies for Am-241 precludes the need to mark the license document for "Official use Only".

ACTION REQUIRED

Licensee to provide requested documentation as additional information for Control No. 316278 and submit it by facsimile (630-515-1078). No follow-up hard copy is needed. Any question, please call me at 630-829-9829. Also **please call me as soon as you have sent the response.**

In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice," a copy of this conversation record will be available electronically for public inspection in the NRC Public Document Room or from the Publicly Available Records (PARS) component of NRC's document system (ADAMS). The NRC's document system is accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html> (the Public Electronic Reading Room).

NAME OF PERSON DOCUMENTING CONVERSATION

SIGNATURE

DATE

Loren J. Hueter



8-15-2007

ACTION TAKEN

SIGNATURE

TITLE

DATE