

Conversation Record



TO: Karen Lapajenko McGuire

COMPANY: Department of the Army.

Jennifer Bishop
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U.S. Nuclear Regulatory Commission
Region III
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CONVERSATION RECORD		TIME	DATE
		10:30 am	11/13/12
NAME OF PERSON(S) CONTACTED	TELEPHONE NO.	ORGANIZATION	
Karen Lapajenko McGuire		Radiation Safety Officer	
License No.: Pending		Control No.: 579291	

SUMMARY

This refers to your new license application dated October 10, 2012 and the phone conversation between Karen Lapajenko McGuire and Jennifer Bishop on November 13, 2012.

1. In NRC Form 313, Item 3, "Address of Use," you stated that the address where the material will be used and stored Worldwide by the Department of the Army. In the NRC guidance document, NUREG 1556, Vol. 1, Rev. 1, Section 8.3, Item 3 indicates that most applicants need to provide two types of information: (1) description of storage, use, and dispatch locations (2) specification of whether they intend to use the portable gauge at temporary job sites.

RESPONSE: Please explain where the gauges will be used and how they will be stored.

2. In Item 3, "Individual(s) Responsible for Radiation Safety Program and Their Training Experience," you proposed Karen Lapajenko McGuire as the Radiation Safety Officer.

RESPONSE: Please confirm that the radiation safety officer will receive the required training by responding with "Before obtaining licensed materials, the proposed RSO will have successfully completed one of the training courses described in Criteria in the section entitled 'Individual(s) Responsible for Radiation Safety Program and Their Training and Experience – Radiation Safety Officer' in NUREG-1556, Vol. 1, Rev. 1, 'Consolidated Guidance about Materials Licenses: Program-Specific Guidance about Portable Gauge Licenses,' dated November 2001"; or alternative information demonstrating that the proposed RSO

is qualified by training and experience.

Please provide the qualifications (not a resume) of your proposed RSO and provide a written, signed (by the proposed RSO and senior management) and currently dated statement that stipulates your proposed RSO accepts the RSO position and understands the duties and responsibilities associated with the position. Refer to Appendices D and E of NUREG 1556, Vol. 1, Rev. 1 for guidance on RSO Qualification requirements and responsibilities.

In addition, please include a delegation of authority for the proposed RSO. A sample Delegation of Authority memo is attached.

3. In Item 4, "Training for Individual(s) Working In or Frequenting Restricted Areas," you indicated that training would be TRADOC Radiological Safety Course or Operation Radiation Safety Course.

RESPONSE: Please respond by submitting a course syllabus and instructor qualifications. For additional information refer for NUREG-1556 Vol. 1, Rev. 1, Appendix D, "Criteria for Acceptable Training Courses for Portable Gauge Users."

Alternatively, respond by stating "Before using licensed materials, authorized users will have successfully completed one of the training courses described in Criteria in the section entitled 'Training for Individuals Working In or Frequenting Restricted Areas' in NUREG-1556, Vol. 1, Rev. 1, 'Consolidated Guidance about Materials Licenses: Program-Specific Guidance about Portable gauge Licenses,' dated September 2001."

4. In Supplement B, Item 6, "Leak Tests," you state that leak tests will be performed at interval not to exceed annually. The testing should be conducted according the manufacturers' recommendations as stated in the Sealed Source Device Registry.

RESPONSE: Please respond by requesting "Leak tests will be performed at intervals approved by NRC or an Agreements State and will be specified in the SSDR Sheet. Leak tests will be performed by an organization authorized by NRC or an Agreement State to provide leak testing services for other licensees or using a leak test kit supplied by an organization authorized by NRC or an Agreements State to provide leak test kits to other licensees and according to the kit supplier's instructions or meets the Criteria in the section entitled 'Radiation Safety Program – Leak Tests' in NUREG-1556, Vol. 1, Rev. 1, dated November 2001."

5. In Supplement B, Item 11, "Operating and Emergency Procedures," you state the procedures are developed, implemented and maintained in the Tester TM. This statement is lacks specificity and does not meet the criteria in NUREG 1556, Vol. 1, Rev. 1

RESPONSE: Please respond by requesting either "We will implement and maintain the operating and emergency procedures in Appendix H of NUREG-1556, Vol. 1, Rev. 1, 'Consolidated Guidance about Materials Licenses: Program-Specific Guidance about Portable Gauge Licenses,' dated November 2001, and provide copies of these procedures to all gauge users and at each job site" or "Operating and emergency procedures will be developed, implemented, and maintained, and will meet the criteria in the section entitled 'Radiation safety

Program – Operating and Emergency Procedures' in NUREG-1556, Vol. 1, Rev. 1, 'Consolidated Guidance about Materials Licenses: Program-Specific Guidance about Portable Gauge Licenses,' dated November 2001."

In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice," a copy of this letter and its enclosure will be available electronically for public inspection in the NRC Public Document Room or from the NRC's Agencywide Documents Access and Management System (ADAMS), accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html>.

Action Required:

Submit the requested information within 14 calendar days (by November 27, 2012) by referencing control number 579291 to facilitate proper handling in our office. Please contact me if you need to make alternative response arrangements.

PLEASE DIRECT ANY QUESTIONS YOU MAY HAVE TO ME AT (630) 829-9607.

NAME OF PERSON DOCUMENTING
CONVERSATION

SIGNATURE
DATE

Jennifer Bishop

Jennifer L. Bishop

11/13/12

Attachment 1

Model Delegation of Authority:

Memo To: Radiation Safety Officer
From: Chief Executive Officer
Subject: Delegation of Authority

You, _____, have been appointed Radiation Safety Officer and are responsible for ensuring the safe use of radiation. You are responsible for managing the Radiation Protection Program; identifying radiation protection problems; initiating, recommending, or providing corrective actions; verifying implementation of corrective actions; stopping unsafe activities; and ensuring compliance with regulations. You are hereby delegated the authority necessary to meet those responsibilities, including prohibiting the use of byproduct material by employees who do not meet the necessary requirements and shutting down operations where justified to maintain radiation safety. You are required to notify management if staff does not cooperate and does not address radiation safety issues. In addition, you are free to raise issues with the Nuclear Regulatory Commission at any time. It is estimated that you will spend ___ hours per week conducting radiation protection activities.

Signature of Management Representative

Date

I accept the above responsibilities,

Signature of Radiation Safety Officer

Date

cc: Affected department heads