



18 August 2014

TO: U.S. Nuclear Regulatory Commission, Region IV  
1600 East Lamar Boulevard  
Arlington, TX 76011-4511

FROM: Justin Cook  
Director, Office of Research Compliance  
Montana State University

SUBJECT: Request Amendment to Broad Scope Type A License 25-00326-06

To Whom It May Concern,

Montana State University (MSU) requests an **expedited** review for our request to amend MSU's Broad Scope Type A License 25-00326-06 to change the Radiation Safety Officer (RSO).

MSU's previous RSO, Mr. Curtis Hofer, has been relieved of his RSO duties and his final day of employment at MSU is today, 18 August 2014. In order to meet the Broad-Scope Type A license criteria, MSU, following approval by the Radiation Safety Committee (RSC) on 8 August 2014, has placed Ms. Kay Altenhofen, as the interim RSO until a recruitment search can be completed. Ms. Altenhofen is the RSO at the University of Montana and she will have similar responsibilities for the safeguards outlined in the Broad Scope Type A license and will ensure compliance with all NRC regulations applicable to MSU's radiation program. Additionally, Dr. Blake Wiedenheft has recently taken over as Chair of MSU's Radiation Safety Committee (RSC) and will help to facilitate this transition.

In order to adequately support this interim transition from Mr. Hofer to Ms. Altenhofen, MSU has also hired Stanley Wilson, a radiation safety expert from Emory University with over 35 years of experience to review MSU's radiation program, physically account for MSU's radiation sources, and perform a leak test of all MSU sealed sources. Mr. Wilson, who arrived at MSU on 11 August 2014, has the following credentials to support this important transition:

Stanley L. Wilson, MMSc, MPH, CHP

Mr. Wilson is an accomplished Radiation Safety Officer with over 35 years of experience at a leading academic medical and health sciences center encompassing 1400 laboratories, five hospitals and multiple community clinics at Emory University. Mr. Wilson has a demonstrated track record of achieving compliance across operationally complex environments. Mr. Wilson has a leadership approach that focuses on building relationships with stakeholders, organizing and leading teams, and promoting compliance

**Office of Research  
Compliance**

CFT5 Suite 229  
P.O. Box 173085  
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**Mountains & Minds**

**PUBLIC**  
☐ Immediate Release  
☒ Normal Release  
  
**NON-PUBLIC**  
☐ A.3 Sensitive-Security Related  
☐ A.7 Sensitive Internal  
☐ Other:  
  
Reviewer: Joe Date: 8/18/14

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through collaboration and cooperation. Diversity of experience includes oversight of research safety; oversight of multiple hospital radiation safety programs; radioactive materials procurement and disposal; design of laboratory, x-ray departments and cyclotron production facilities; Increased Controls implementation and incident response.

**Examples of relevant work experience-**

*Emory University:* Radiation Safety Officer and program manager for Emory University, an academic medical licensee of Broad Scope type A. Documented record of compliance; prior four state inspections with zero violations.

*Emory University:* Successfully petitioned to amend proposed Georgia regulations during rulemaking comment period in order to improve the final rule and streamline licensee's ability to comply.

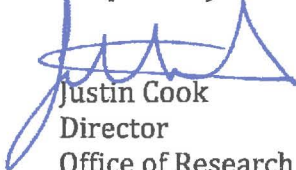
*Emory University:* Oversight of decommissioning production/ research 11 Me V proton cyclotron and radiopharmacy. Review decommissioning plan, surveys, documentation, and communications to regulators.

The following delineates the interim RSO's duties and responsibilities:

The RSO serves as the highest-level campus subject matter expert and responsible officer concerning MSU's radiation safety program and ensures implementation of quality control procedures and safety according to all regulations, specifically those mandated by the NRC. The RSO is responsible for assuring that all campus use of ionizing radiation and radiation material conforms to MSU Broad Scope Type A license, selected industry standards, and applicable government regulations. The RSO is responsible to ensure that radiation exposures to both on-campus and off-campus personnel and members of the general population are As Low As Reasonably Achievable (ALARA).

Please let me know if you have any questions or concerns. My contact information is 406-994-4171 or [jcook@montana.edu](mailto:jcook@montana.edu).

Respectfully,

A handwritten signature in blue ink, appearing to read 'Justin Cook', with a stylized flourish extending from the bottom left.

Justin Cook  
Director  
Office of Research Compliance  
Montana State University



18 August 2014

TO: All MSU Employees

FROM: Justin Cook  
Director, Office of Research Compliance

SUBJECT: Delegation of Authority for Radiation Safety Officer

Ms. Kay Altenhofen, the Radiation Safety Officer (RSO) from the University of Montana, has been appointed as the interim RSO for Montana State University (MSU) and is responsible for ensuring the safe use of byproduct material. The RSO is responsible for managing the radiation safety program; identifying radiation safety problems; initiating, recommending, or providing corrective actions; verifying implementation of corrective actions; and ensuring compliance with regulations for the use of byproduct material. The RSO is hereby delegated the authority necessary to meet these responsibilities.

The RSO has the authority to immediately stop any operations involving the use of byproduct material in which health and safety may be compromised or may result in non-compliance with Nuclear Regulatory Commission (NRC) requirements. Additionally, MSU has hired Stanley Wilson, a radiation safety expert from Emory University with over 35 years of experience to support Ms. Altenhofen's role as interim RSO. Mr. Wilson, who arrived at MSU on 11 August 2014, can also support any radiation safety related questions or support.

Please let me know if you have any questions or concerns. My contact information is 406-994-4171 or [jcook@montana.edu](mailto:jcook@montana.edu).

Respectfully,

Justin Cook  
Director  
Office of Research Compliance  
Montana State University

**Office of Research  
Compliance**

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**Mountains & Minds**

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BETWEEN:

Accounts Receivable/Payable  
and  
Regional Licensing Branches

[ FOR ARPB USE ]  
INFORMATION FROM WBL

Program Code: 01100  
Status Code: Pending Amendment  
Fee Category: 3E 3L 3P  
Exp. Date:  
Fee Comments: 170.11(A)(4)  
Decom Fin Assur Req'd: Y

## License Fee Worksheet - License Fee Transmittal

### A. REGION

#### 1. APPLICATION ATTACHED

Applicant/Licensee: MONTANA STATE UNIVERSITY  
Received Date: 08/19/2014  
Docket Number: 3000871  
Mail Control Number: 584599  
License Number: 25-00326-06  
Action Type: Amendment

#### 2. FEE ATTACHED

Amount: \_\_\_\_\_

Check No.: \_\_\_\_\_

#### 3. COMMENTS

Signed: \_\_\_\_\_

*Colleen Murnahan*

Date: \_\_\_\_\_

*8-19-2014*

### 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: \_\_\_\_\_





DATE

08/21/2014

NAME AND ADDRESS OF APPLICANT AND/OR LICENSEE

Montana State University, Safety & Risk Mngt. Dept  
Radiation Safety Office  
ATTN: Kay Altenhofen (proposed RSO)  
1160 Research Drive  
Bozeman, MT 59718-6856

LICENSE NUMBER

25-00326-06

MAIL CONTROL NUMBER

584599

LICENSING AND/OR TECHNICAL REVIEWER

cmurnahan

A handwritten signature in blue ink, appearing to be "Cmurnahan".

This is to acknowledge the receipt of your:

☒ LETTER and/or ☐ APPLICATION

DATED: 08/18/2014

The initial processing, which included an administrative review, has been performed.

☒ AMENDMENT ☐ TERMINATION ☐ NEW LICENSE ☐ RENEWAL

☒ There were no administrative omissions identified during our initial review.

☐ This is to acknowledge receipt of your application for renewal of the material(s) license identified above. Your application is deemed timely filed, and accordingly, the license will not expire until final action has been taken by this office.

☐ Your application for a new NRC license did not include your taxpayer identification number. Please fill out NRC Form 531, located at the following link:

<http://www.nrc.gov/reading-rm/doc-collections/forms/nrc531.pdf>

Send the completed NRC Form 531, by facsimile, to the following number: (301) 415-5387

A copy of your action has been emailed to our License Fee and Accounts Receivable Branch, in our Headquarters office in Rockville, MD. You will be contacted separately if there is a fee issue involved.

Your application has been assigned the above listed **MAIL CONTROL NUMBER**. When calling to inquire about this action, please refer to this control number. Your application has been forwarded to a technical reviewer. Please note that the technical review, which is normally completed within 180 days for a renewal application (90 days for all other requests), may identify additional omissions or require additional information. If you have any questions concerning the processing of your application, our contact information is listed below:

Region IV  
U. S. Nuclear Regulatory Commission  
DNMS/NMSB - B  
1600 E. Lamar Blvd.  
Arlington, TX 76011-4511  
(817) 200-1103 or (817) 200-1140

*emailed to licensee  
8-21-14*