

J. O'Rullian



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UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION IV
1600 E LAMAR BLVD
ARLINGTON, TX 76011-4511



EMAIL

Name: Jon O'Rullian License: 11-35111-01
Docket: 030-38691
Organization: Radiation Solutions, LLC Control: 586988
E-mail Address: jonorullian@msn.com
From: Jacqueline D. Cook
Date: July 1, 2015
Subject: Letter dated June 1, 2015 for License Amendment
Pages:

Mr. O'Rullian:

Per your letter dated June 1, 2015, the items on the next page are deficiencies (request for additional information) which require your response. **Please respond to this e-mail by Monday, July 13, 2015.** If you are unable to respond by this due date, please don't hesitate to contact me so we can discuss an extension to the date. Our fax number is (817) 200-1263. You may respond by e-mail in pdf format if you'd like. My email address is Jackie.Cook@nrc.gov. When responding to this e-mail, please include the license, docket and control numbers located at the top of this page.

Please note that I used NUREG-1556, Volume 5, "Consolidated Guidance About Materials Licenses: Program-Specific Guidance About Self-Shielded Irradiator Licenses", dated October 1998. Please use this guidance document to assist you in responding to the deficiencies on the next page. (<http://www.nrc.gov/reading-rm/doc-collections/nuregs/staff/sr1556/v5/>).

Thanking you in advance for your cooperation, assistance, and prompt response in this matter.

/RA/
Jacqueline D. Cook
Senior Health Physicist

PUBLIC

- ☐ Immediate Release
☒ Normal Release

NON-PUBLIC

- ☐ A.3 Sensitive-Security Related
☐ A.7 Sensitive Internal
☐ Other: _____

Reviewer: GPC

Date: 7/1/15

1. Please note that in Appendix I of your amendment request letter dated June 1, 2015, of the types of non-routine maintenance to be performed on self-shielded irradiators and gamma stereotactic radiosurgery units (gamma knife) states, in part, as follows: gauge relocation or removal of a gauge from service.

Please explain this discrepancy.

2. Please note that in Appendix I describing the technicians' training, you state, in part, that they will be qualified by observation of the RSO. Please note that we believe that solely being qualified by observation of the RSO is insufficient and inadequate.

Please describe the technicians' training and experience which should include the following: 1) previous experience in non-routine maintenance and radiation safety training 2) vendor maintenance certification. If the technicians do not have any previous experience in non-routine maintenance and radiation safety training, please so state; however, please note that you made the commitment that "before performing non-routine maintenance proposed technicians will have successfully completed the training described in Appendix G in NUREG-1556, Vol. 5, dated October 1998 and under direct supervision of the RSO."

Please reconfirm this commitment and update the non-routine experience of the technicians accordingly.

3. Please note that upon issuance of the amendment you requested, we will approve non-routine maintenance on the manufacturers and models of self-shielded irradiators and the gamma knives that you actually received training. In the future, if you want to expand your approval for a manufacturer and model of self-shielded irradiator(s) and/or gamma knives not currently authorized, please submit your request showing the manufacturer, model, date of training, location of training, non-routine maintenance performed, supervisor, license performed under, and procedures used as outlined in Appendix A of your amendment request dated June 1, 2015.

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☐ A.7 Sensitive Internal
☐ Other:

Reviewer: GPCDate: 7/1/15