



UNITED STATES
NUCLEAR REGULATORY COMMISSION

REGION III
2443 WARRENVILLE ROAD, SUITE 210
LISLE, ILLINOIS 60532-4352

TELEFAX TRANSMITTAL

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SEND TO Daniel A. Dombos II, PE, Abonmarche Consultants, Inc., NRC License
21-26663-01

LOCATION Benton Harbor, Michigan

FAX NUMBER (269) 927-1017

☐ VERIFY BY CALLING

FROM: Bill Reichhold
(Sender)

TELEPHONE NUMBER (630) 829-9839

FAX NUMBER (630) 515-1078

If you do not receive the complete fax transmittal, please contact the sender as soon as possible at the telephone number provided above.

MESSAGE See accompanying documents.

NOTICE

This message is intended only for the use of the individual or entity to which it is addressed and may contain information that is privileged, confidential, or exempt from disclosure under applicable law. If the reader of this message is not the intended recipient or the employee responsible for delivering the message to the intended recipient, you are hereby notified that any dissemination, distribution or copying of this communication is strictly prohibited. If you received this communication in error, please notify the sender immediately by telephone and return the original to the above address, by U.S. Mail. Thank You.

The following additional information is needed to complete the review of your request to change the Radiation Safety Officer.

1. Your letter dated February 29, 2016, states that the proposed new Radiation Safety Officer (RSO), Lucas Grosse was scheduled to take the appropriate training course for the RSO in March 2016. Please submit a copy of the certificate that shows that Lucas Grosse has successfully completed the RSO's training and has experience with the portable nuclear gauges. Please see the attached information regarding the training and experience for a RSO for portable nuclear gauges.
2. Please submit documentation of the RSO's experience with the portable moisture/density gauge. For example, making measurements with the gauge, controlling and maintaining surveillance over the portable gauge, performing routine cleaning and lubrication, packaging and transporting the gauge, storing the gauge, and following emergency procedures.
3. Please submit a "Delegation of Authority" for the new RSO, Lucas Grosse. Please see the attached "Model Delegation of Authority to RSO".

Please send a facsimile (630-515-1078) of your response to the above within 7 days and state, Response to Control 590296. Please include a cover letter on company letterhead, dated and signed (signed by an individual who is authorized to sign official documents on behalf of the licensee) with your response letter. Please call me at 630-829-9839 if you have any questions.

In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice," a copy of this facsimile and the attached documents 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).

From the desk of:


Bill Reichhold

CONTENTS OF AN APPLICATION

8.7 ITEM 7: INDIVIDUAL(S) RESPONSIBLE FOR RADIATION SAFETY PROGRAM AND THEIR TRAINING AND EXPERIENCE

Regulations: 10 CFR 30.33(a)(3).

Criteria: RSOs must have adequate training and experience. In the past, NRC has found successful completion of one of the following as evidence of adequate training and experience:

- Portable gauge manufacturer's course for users or for RSOs; or
- Equivalent course that meets Appendix D criteria.

Discussion: The person responsible for the radiation protection program is called the RSO. The RSO needs independent authority to stop operations that he or she considers unsafe. He or she must have sufficient time and commitment from management to fulfill certain duties and responsibilities to ensure that radioactive materials are used in a safe manner. Typical RSO duties are illustrated in Figure 8.1 and described in Appendix E. NRC requires the name of the RSO on the license to ensure that licensee management always has a responsible, qualified person identified and that the named individual knows of his or her designation as RSO.

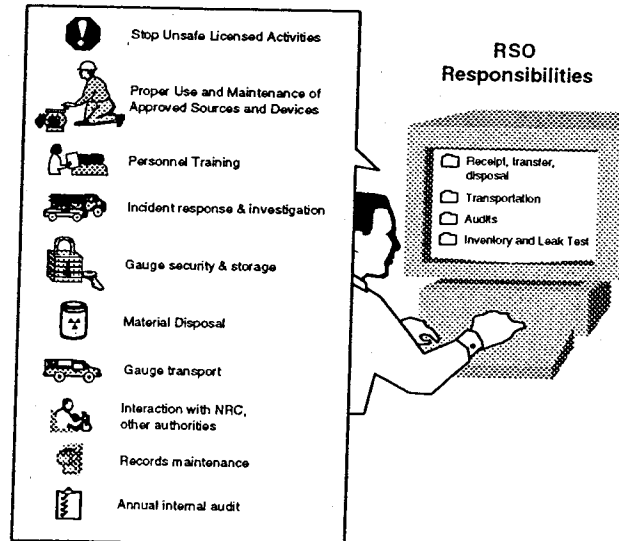


Figure 8.1 RSO Responsibilities. *Typical duties and responsibilities of RSOs.*

Response from Applicant: Provide either of the following:

- Name of the proposed RSO;

AND EITHER

- Statement that: "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.

Note: It is important to notify NRC, as soon as possible, of changes in the designation of the RSO.

Alternative responses will be reviewed against the criteria listed above.

8.8 ITEM 8: TRAINING FOR INDIVIDUALS WORKING IN OR FREQUENTING RESTRICTED AREAS (INSTRUCTIONS TO OCCUPATIONALLY EXPOSED WORKERS AND ANCILLARY PERSONNEL)

Regulations: 10 CFR 19.11, 10 CFR 19.12, 10 CFR 30.7, 10 CFR 30.9, 10 CFR 30.10, 10 CFR 30.33.

Criteria: Authorized users must have adequate training and experience. In the past, NRC has found successful completion of one of the following as evidence of adequate training and experience:

- Portable gauge manufacturer's course for users; or
- Equivalent course that meets Appendix D criteria.

Discussion: The individuals using the gauges are usually referred to as authorized users. Authorized users have the responsibility to ensure the surveillance, proper use, security, and routine maintenance of portable gauges containing licensed material.

Appendix D

Criteria for Acceptable Training Courses for Portable Gauge Users

COURSE CONTENT

- 1.5 to 2 hours of radiation safety and regulatory requirements, emphasizing practical subjects important to safe use of the gauge; radiation vs. contamination; internal vs. external exposure; concept of time, distance, and shielding to minimize exposure; control and surveillance of gauges; location of sealed source within the portable gauge; inventory; recordkeeping; incidents; licensing and inspection by regulatory agency; need for complete and accurate information; employee protection; deliberate misconduct.
- 1.5 to 2 hours of practical explanation of portable gauge theory and operation; operating, emergency, maintenance, and transportation procedures; and field training emphasizing radiation safety and including test runs of setting up and making measurements with the gauge, controlling and maintaining surveillance over the portable gauge, performing routine cleaning and lubrication, packaging and transporting the gauge, storing the gauge, and following emergency procedures.

COURSE EXAMINATION

- At least a 70-percent score on a 25-to-50-question, closed-book written test
 - Emphasis on radiation safety of portable gauge storage, use, sealed source location, maintenance, and transportation, rather than the theory and art of making portable gauge measurements;
 - Review of correct answers to missed questions with prospective gauge user immediately following the scoring of the test.

COURSE INSTRUCTOR QUALIFICATIONS

Instructor should have either:

- Bachelor's degree in a physical or life science or engineering;
- Successful completion of a portable gauge user course;
- Successful completion of an 8-hour radiation safety course; and
- 8 hours hands-on experience with portable gauges.

OR

- Successful completion of portable gauge user course;
- Successful completion of 40-hour radiation safety course; and
- 30 hours of hands-on experience with portable gauges.

Note: Licensees should maintain records of training.

Please submit a "Delegation of Authority" for the Radiation Safety Officer (see model "Delegation of Authority").

Please have the Chief Executive Officer (or designee) and the Radiation Safety Officer sign the "Delegation of Authority" document.

Model Delegation of Authority to RSO

Memo To: Radiation Safety Officer
From: Chief Executive Officer (or designee)
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, when 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 U.S. 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

**Please
Sign & Date**

I accept the above responsibilities,

Signature of Radiation Safety Officer

Date

**Please
Sign & Date**

cc: Affected department heads