



**UNITED STATES**  
**NUCLEAR REGULATORY COMMISSION**  
REGION I  
2100 RENAISSANCE BLVD.  
KING OF PRUSSIA, PA 19406-2713

November 14, 2016

Vince McCormick, Manager QHSE/Utilities  
Bayer CropScience LP  
P.O. Box 1005  
Rt 25 & I-64  
Institute, West Virginia 25112

SUBJECT: BAYER CROPSCIENCE LP, REQUEST FOR ADDITIONAL INFORMATION,  
MAIL CONTROL NO. 592192

Dear Mr. McCormick:

This is in reference to your letter dated October 12, 2016, requesting to amend NRC License No. 47-04373-01. In order to continue our review, we need the following additional information:

1. You have proposed a new Radiation Safety Officer, Joseph Murphy. You have submitted a certificate of training demonstrating 40 hours of specialized training as a Radiation Safety Officer. NUREG-1556, Volume 4, Rev. 1, section 8.7 says to provide documentation stating the proposed RSO is qualified by training and experience. The course taken does not appear to be one that provides training specifically about fixed gauges. In particular in Appendix D of the NUREG, it states acceptable training to include Practical explanation of the theory and operation for each gauge possessed by the licensee and supervised, Hands-On Experience involving operating procedure test runs of emergency procedures, routine maintenance and lock-out procedures. Please provide information associated with the training or experience of Mr. Murphy as it relates to these aspects.
2. Item 9.B. of your license states that you use Agilent Technologies Detector Cell Model G2397A. This detector model was originally distributed as a general licensed item. Having this authorized on your license allows you to convert the generally licensed item into specifically licensed material. Please confirm that you have converted material onto your license in accordance with 10 CFR 31.5 or that you wish to convert in the future.
3. License Condition 17.A. states that individual who completed training specified in the letter dated June 10, 2009 may perform certain tasks. In your application dated September 9, 2016, the only personnel who were authorized to perform this task, according to Appendix F of SS-SAF-L2-014, is Doug Nye or Matt Harris. Please confirm that one or both of these individuals still are employed at the plant. Alternately, please ask that this license condition be removed or submit a new SS-SAF-L2-014, Appendix F which has personnel who are qualified and trained to perform these tasks.
4. Please provide the telephone contact number, facsimile number, and email address for Mr. Murphy.

We will continue our review upon receipt of this information. Please reply to my attention at:

Dennis Lawyer  
Mail Control No. 92192  
USNRC, Region I  
Division of Nuclear Materials Safety  
2100 Renaissance Boulevard  
King of Prussia, PA 19406

In order to continue prompt review of your application, we request that you submit your response to this letter within 30 calendar days from the date of this letter.

An electronic version of the NRC's regulations is available on the NRC Web Site at: [www.nrc.gov](http://www.nrc.gov). Additional information regarding use of radioactive materials may be obtained on the NRC Web Site at: <http://www.nrc.gov/materials/miau/mat-toolkits.html>. This site also provides the link to the toolbox for updated information on the revised regulations for naturally-occurring and accelerator-produced radioactive materials (NARM).

In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice," a copy of this letter will be available electronically for public inspection in the NRC Public Document Room or from the NRC's document system (ADAMS). ADAMS is accessible from the NRC Web Site at: <http://www.nrc.gov/reading-rm/adams.html>. Please be aware that you may request that certain portions of your submittal to NRC be withheld from public disclosure as proprietary information. To do this, you must execute an affidavit as specified in 10 CFR 2.390. You must list all portions that you wish to be held proprietary, along with your reasoning as to why that is appropriate. While it is allowable, please refrain from submitting proprietary information in support of a license unless necessary. Keep in mind that all NRC licenses are considered to be in the public domain, and therefore may be viewed by any member of the public who requests to see them.

If you have any questions regarding this request for additional information, please contact me at 610-337-5366 or via electronic mail Dennis Lawyer.

Thank you for your cooperation.

Sincerely,

/RA/

Dennis Lawyer, Health Physicist  
Commercial, Industrial, R&D  
and Academic Branch  
Division of Nuclear Materials Safety  
Region I

License No. 47-04373-01  
Docket No. 03006663  
Mail Control No. 592192

cc: Douglas L. Nye, Radiation Safety Officer  
Joseph Murphy, Proposed Radiation Safety Officer

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License No. 47-04373-01

Docket No. 03006663

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cc: Douglas L. Nye, Radiation Safety Officer

Joseph Murphy, Proposed Radiation Safety Officer

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SUNSI Review Complete: DLawyer

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