



**UNITED STATES  
NUCLEAR REGULATORY COMMISSION**

REGION III  
2443 WARRENVILLE RD. SUITE 210  
LISLE, IL 60532-4352

**JUN 25 2019**

Andrew G. Welding  
Radiation Safety Officer  
University of Notre Dame du Lac  
636 Grace Hall  
Risk Management and Safety  
Notre Dame, IN 46556

Dear Mr. Welding:

We have reviewed your amendment request dated May 20, 2019 requesting to name a new Radiation Safety Officer (RSO), Ms. Mary Beth Greendonner. Based on the review, we will need the following information regarding her training and experience related to your radiation safety program.

- 1) A copy of the delegation of authority for RSO. A sample is attached for your reference.
- 2) Information about her training and experience commensurate with the licensed material and authorized activities listed in Items 6, 7, 8 and 9 in your license. The training should include the following subjects: a) radiation protection principles, b) characteristics of ionizing radiation, c) units of radiation dose and quantities, d) radiation detection and measurement instrumentation, e) biological hazards of exposure to radiation (appropriate to types and forms of licensed material to be possessed and used listed in the license), f) applicable NRC regulatory requirements and standards (10 CFR part 19, 20, 21, 30, 31, 33, 37, 40, 70, 71, etc.), and g) hands-on use of radioactive materials commensurate with the uses listed in Item 9 of your license (radionuclides, physical/chemical forms, quantities handled, activities performed, duration of experience, and company/entity where the hands-on use was experienced.)

The amount of training and experience will depend on the radionuclide, form, possession limit, and use of the licensed material listed in the license. For instance, in addition to a college degree, RSOs at most broad scope licensees should be specialists in the field of radiation protection and may need at least 40 hours of radiation safety training specific to their job duties, as well as a year of experience with similar types, forms, quantities, and uses of radioactive material before the individual is qualified to be an RSO.

The RSO designee should have obtained the above training in formal course(s) designed for RSOs, presented by an academic institution, commercial radiation safety consulting company, or a professional organization of radiation protection experts. In addition, the proposed RSO's experience should be sufficient to identify and control the anticipated radiation hazards. For example, the RSO should have experience planning and conducting evaluations, surveys, and measurements similar

to those required by the licensee's radiation safety program.

- 3) Address the RSO's experience in performing each of the duties listed in Item 7.3, "Radiation Safety Officer" in your renewal application (NRC Form 313) dated June 22, 2017, including when and where the experience was gained, and the type, form, and quantity of radionuclides involved.

In addition, the application noted that you, current RSO named on the license, will be retiring on June 30, 2019. During a telephone call with you on June 25, 2019, you stated that you will continue performing the RSO's duties until a qualified RSO be named on the license. Please provide a confirmation for the above in writing.

To continue the review of your amendment request, we request that you submit a written response to this letter by July 25, 2019. Your response must be dated and signed by a licensee's representative and please reference Mail Control Number 612298 in the response. To expedite the licensing process, you could fax your response to 630-515-1078. If you have any questions or require clarification on any of the information stated above, please do not hesitate to contact me at 630-829-9887 or [frank.tran@nrc.gov](mailto:frank.tran@nrc.gov).

In accordance with Title 10 of the *Code of Federal Regulations* Section 2.390 of the U.S. Nuclear Regulatory Commission's (NRC) "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>.

Sincerely,



Frank P.D. Tran  
Health Physicist  
Materials Licensing Branch

License No. 13-01983-15  
Docket No. 030-00694

## 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 and secure 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

\_\_\_\_\_  
Name

\_\_\_\_\_  
Title

I accept the above responsibilities,

\_\_\_\_\_  
Signature of Radiation Safety Officer

\_\_\_\_\_  
Date

**cc: Affected department heads**