

**From:** [Ullrich, Elizabeth](#)  
**To:** [Gilstad, John](#)  
**Cc:** [Joshua Molgaard](#); [Danielle Wooten](#); [Divis, Jeffrey](#)  
**Subject:** additional information needed in support of the proposed RSO for the broad scope A license  
**Date:** Thursday, September 05, 2019 3:07:00 PM

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License No. 19-08330-02  
Docket No. 030-04545  
Control No. 613742

CAPT Gilstad,

We reviewed the additional information provided in support of LT Divis as the Radiation Safety Officer (RSO) for License No. 19-08330-02, the Type A license of broad scope. The proposed RSO does not appear to have adequate experience overseeing a Type A license of broad scope (broad scope A) program or working with the types, quantities, and forms of radioactive materials authorized by your broad scope A license. He does appear to have education and training in health physics that is sufficient for the pool irradiator and sealed source activities, and should be sufficient to understand the different risks from the range of radionuclides and quantities authorized in "any" form on your license. Because the actual use of licensed materials under your broad scope A license has been much less than is authorized, and your broad scope A program has a Radionuclide and X-ray Safety Committee that is well-established, we would be willing to approve the proposed RSO if a commitment is made that includes, for at least a 1 year period:

- Mentoring by an RSO of another broad scope A program that authorizes a similar program. Such mentoring should include a commitment to regular meetings at least once every 3 months to review the activities of an RSO, attendance at one or more RSC meetings of the other license, and participation in other activities with unsealed materials that would expand the proposed RSO's knowledge and experience. There are several federal facilities in the Bethesda area that hold Type A licenses of broad scope, and other federal entities elsewhere in Maryland, that have similar programs. We need confirmation from the mentor that they are willing to do this.; and
- Review of the AFRRI broad scope A program by the mentor, or other qualified outside auditor(s), towards the end of the 1 year mentoring period. If the review is sufficient in scope, it may be the same review as is required annually pursuant to 10 CFR 20.1101.; and
- Confirmation from the current Chair of the Radionuclide and X-ray Safety Committee (RXSC) that the RXSC is supportive of the proposed RSO participating in the 1-year mentoring period.

Your response can be a signed hard copy letter mailed to the address below; or a pdf copy of the originally signed letter (digital signature is accepted) may be sent by email to R1DNMSMAIL RESOURCE [R1DNMSMAIL.RESOURCE@nrc.gov](mailto:R1DNMSMAIL.RESOURCE@nrc.gov) ; or a copy of the signed letter may be faxed to 610-337-5269. Please refer to Mail Control No. 613742 so that the response can be linked to the correct licensing action.

Thank you for your attention in this matter,

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