



UNIFORMED SERVICES UNIVERSITY OF THE HEALTH SCIENCES

ARMED FORCES RADIOBIOLOGY RESEARCH INSTITUTE
8901 WISCONSIN AVENUE, BUILDING 42
BETHESDA, MARYLAND 20889-5603
www.usuhs.edu/afri



18 September 2019

Licensing Assistance Team
Division of Nuclear Materials Safety
U.S. Nuclear Regulatory Commission, Region 1
2100 Renaissance Blvd, Suite 100
King of Prussia, PA 19406-2713

Subject: PROPOSED MENTORING PROGRAM ICO LT JEFFREY DIVIS

1. In response to the NRC request for additional information in support of AFRRI proposed RSO LT Jeffrey Divis, and endorsed by the chair of our Radionuclide and X-ray Safety Committee per enclosure (1), this letter outlines the mentorship plan for LT Divis to meet the NRC requirements established in the message dated 5 September 2019.
2. Per enclosure (2), we have reached out to the RSO at the Uniformed Services University of the Health Sciences (USUHS), the RSO at the National Institute of Standards and Technology (NIST) and the RSO at the National Aeronautics and Space Administration (NASA) Goddard Space Flight Center (GSFC). Each have agreed to assist LT Divis in participating in a mentorship program and establish regular meetings of at least once every three months to go over processes practiced by similarly licensed facilities around this area. A record of these meetings will be available for review.
3. LT Divis is a member of the Radiation Safety Committee (RSC) at USUHS and will attend those meetings as required. At the time of this letter his appointment letter is still being routed and will be provided to the NRC as soon as is available. He will also attend at least one RSC meeting from NIST and NASA GSFC as an observer for further familiarization of the management of a RSC.
4. In Third Quarter 2020, a qualified outside auditor such as the RSO of one of the before mentioned facilities or a previous RSO of this facility will aid LT Divis in conducting an annual review of the broad scope A license.
5. The AFRRI point of contact for this correspondence is LT Jeffrey A. Divis, RSO, at (301)-295-1285, email jeffrey.divis@usuhs.edu.

John Gilstad, MD
CAPT, MC, USN
Institute Director

Enclosures: (1) CAPT Wooten endorsement
(2) Correspondence from USUHS, NIST and NASA concerning mentorship program



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18 September 2019

MEMORANDUM FOR NUCLEAR REGULATOR COMMISSION REGION 1

From: CAPT Danielle Wooten, Chair of the Radionuclide and X-ray Safety Committee

Subject: Mentorship program ICO LT Jeffrey A. Divis

1. I support the mentorship program for LT Jeffrey Divis as outlined in the directors letter to the NRC dated 18 September 2019.
2. If you have any questions, my POC is LT Jeffrey A. Divis, RSO, at (301)-295-1285, email jeffrey.divis@usuhs.edu.

Danielle R. Wooten
CAPT, MSC, USN
RXSC Chair

additional information needed in support of the proposed RSO for the broad scope A license

Champine, Brian <brian.champine@usuhs.edu>
To: "Divis, Jeffrey" <jeffrey.divis@usuhs.edu>
Cc: Michael Woolbert <michael.woolbert.ctr@usuhs.edu>

Tue, Sep 17, 2019 at 3:06 PM

LT Divis,

I would be happy to serve as your mentor over the next year to fulfill the requirements outlined by the NRC correspondence below. As you know, our next RSC is scheduled for next Thursday, September 26th. Additionally, you are welcome to come over any time based on your schedule.

Respectfully,

Brian Champine, PhD, CHP
LTC, US Army
Assistant Vice President, Health & Safety
Radiation Safety Officer
Uniformed Services University of the Health Sciences
4301 Jones Bridge Road
Bethesda, MD 20814
(301)295-3305

On Tue, Sep 17, 2019 at 2:49 PM Divis, Jeffrey <jeffrey.divis@usuhs.edu> wrote:

Sir,

The NRC has proposed a mentor program for me as a new RSO to gain experience on a broad scope A license. Please let me know if I can come and shadow some processes related to your broad scope license.

V/R,
LT Jeffrey Divis

----- Forwarded message -----

From: Ullrich, Elizabeth <Elizabeth.Ullrich@nrc.gov>
Date: Thu, Sep 5, 2019 at 3:08 PM
Subject: additional information needed in support of the proposed RSO for the broad scope A license
To: Gilstad, John <john.gilstad@usuhs.edu>
Cc: Joshua Molgaard <joshua.molgaard@usuhs.edu>, Danielle Wooten <danielle.wooten@usuhs.edu>, Divis, Jeffrey <jeffrey.divis@usuhs.edu>

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 AFRRRI 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@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,

Betsy Ullrich

Betsy Ullrich, CHP, Senior Health Physicist

USNRC Region I

2100 Renaissance Boulevard, Suite 100

King of Prussia, PA 19406

610-337-5040 (office)

240-704-4575 (cell)

Elizabeth.ullrich@nrc.gov

--

Very respectfully,

LT Jeffrey Divis

Radiation Safety Officer

AFRI

office: 301-295-1285

cell: 301-605-5216

additional information needed in support of the proposed RSO for the broad scope A license

Mejias, Manny (Fed) <manny.mejias@nist.gov>
To: "Divis, Jeffrey" <jeffrey.divis@usuhs.edu>

Fri, Sep 6, 2019 at 11:43 AM

Good morning LT Divis,

I'll be more than glad to assist you with this. Please let me know what would be a good time to have an initial phone chat. We can schedule a site visit at your convenience for an in-person meeting as well as a tour of our broadscope program.

Best regards,

Manny

Manuel Mejias, RRPT
Radiation Safety Officer (SNM-362 License)
Chief, Gaithersburg Radiation Safety Division
Office of Health, Safety, and Environment
National Institute of Standards and Technology
Tel: (301) 975-5022
Cell: (240) 364-4464

From: Divis, Jeffrey [mailto:jeffrey.divis@usuhs.edu]
Sent: Friday, September 06, 2019 11:25 AM
To: Mejias, Manny (Fed)
Subject: Fwd: additional information needed in support of the proposed RSO for the broad scope A license

Good Morning,

Following up with my call earlier today, I am the new RSO for AFRRI. The following email is from the NRC citing that I need more experience with the Broad Scope license and have suggested a mentoring program with other Broad Scope licenses in the region. Would you be willing to have me come sit in on your RSC and shadow some procedures relating to your broad scope license? Let me know if this is possible. If it is, I will need something from you to state that you are willing to do this. Thank you.

Very respectfully,

LT Jeffrey Divis

Radiation Safety Officer

AFRRI

office: 301-295-1285

cell: 301-605-5216

----- Forwarded message -----

From: **Ullrich, Elizabeth** <Elizabeth.Ullrich@nrc.gov>

Date: Thu, Sep 5, 2019 at 3:08 PM

Subject: additional information needed in support of the proposed RSO for the broad scope A license

To: Gilstad, John <john.gilstad@usuhs.edu>

Cc: Joshua Molgaard <joshua.molgaard@usuhs.edu>, Danielle Wooten <danielle.wooten@usuhs.edu>, Divis, Jeffrey <jeffrey.divis@usuhs.edu>

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 AFRRRI 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 ; 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,

Betsy Ullrich

Betsy Ullrich, CHP, Senior Health Physicist

USNRC Region I

2100 Renaissance Boulevard, Suite 100

King of Prussia, PA 19406

610-337-5040 (office)

240-704-4575 (cell)

Elizabeth.ullrich@nrc.gov

additional information needed in support of the proposed RSO for the broad scope A license

Simpson, Daniel S. (GSFC-3600) <daniel.s.simpson@nasa.gov>
To: "Divis, Jeffrey" <jeffrey.divis@usuhs.edu>

Tue, Sep 17, 2019 at 1:47 PM

Lt Divis:

Great to talk to you by phone a couple of times and now I'm responding back to your September 6th email about being able to be your MENTOR as listed in Ms. Ullrich's email below. YES I will!

I will send you some dates and times that are available for you to come over to our Center to start the Mentoring Process.

Daniel S. Simpson

GSFC's Radiation Safety Officer

Head, Radiation Protection Office

Safety Division, Code 360

National Aeronautics and Space Administration

Goddard Space Flight Center

Greenbelt, MD 20771

(301) 286-0280

Fax: (301) 286-0797

From: Divis, Jeffrey [mailto:jeffrey.divis@usuhs.edu]

Sent: Friday, September 06, 2019 10:59 AM

To: Simpson, Daniel S. (GSFC-3600) <daniel.s.simpson@nasa.gov>

Subject: [EXTERNAL] Fwd: additional information needed in support of the proposed RSO for the broad scope A license

Good Morning,

Thank you for your help. I'm forwarding the NRC request for additional information we just received. Let me know if I need to do anything special for access. I already have someone at USUHS to help me with the Annual review of the program. I will need something to send to the NRC saying that you are willing to do this for our response to them. I look forward to meeting you and hearing all the great stories you have.

Very Respectfully,

LT Jeffrey Divis

----- Forwarded message -----

From: Ullrich, Elizabeth <Elizabeth.Ullrich@nrc.gov>

Date: Thu, Sep 5, 2019 at 3:08 PM

Subject: additional information needed in support of the proposed RSO for the broad scope A license

To: Gilstad, John <john.gilstad@usuhs.edu>

Cc: Joshua Molgaard <joshua.molgaard@usuhs.edu>, Danielle Wooten <danielle.wooten@usuhs.edu>, Divis, Jeffrey <jeffrey.divis@usuhs.edu>

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 ; 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.

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Very respectfully,

LT Jeffrey Divis

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