



**UNITED STATES
NUCLEAR REGULATORY COMMISSION**

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

OCT 22 2019

Jim Seufert
Radiation Safety Officer
Grand Valley State University
College of Liberal Arts and Sciences
1 Campus Drive
Allendale, MI 49401

Dear Mr. Seufert:

We have reviewed the renewal application for NRC License No. 21-32172-01. NUREG-1556, Volume 7, Revision 1, "Consolidated Guidance About Materials Licenses: Program-Specific Guidance About Academic, Research and Development, and Other Licenses of Limited Scope" was used in the review of your application. For your references, an electronic copy of NUREG-1556, Volume 7, Revision 1 can be found on the NRC's Web site at <https://www.nrc.gov/reading-rm/doc-collections/nuregs/staff/sr1556/v7/>. Based on the review, we will need the following information.

- 1) Provide a current copy of the delegation of authority memorandum for the proposed Radiation Safety Officer (RSO). An example of the memorandum is enclosed for your reference.
- 2) Please describe the facilities and equipment that will be available at each location where radioactive material will be used (see Appendix G of NUREG-1556, Volume 7, Revision 1 for topics to consider), include the area(s) assigned for the receipt, storage, security, preparation, measurement, use, and disposal of radioactive materials (diagrams should be drawn to a specified scale or dimensions with a North indication.) Describe how facility design and procedures for operation will minimize contamination of the facility and the environment, facilitate eventual decommissioning, and minimize the generation of radioactive waste.
- 3) Please confirm if the licensee will use any volatile radioactive material. If yes, provide the diagrams that shows the ventilation system for the areas (fume hoods, etc.) where licensed materials may become airborne and the schematic descriptions of the ventilation system including the airflow rates, pressures, filtration equipment (HEPA filter, charcoal filter, etc.), and monitoring system (see NUREG-1556, Volume 7, Revision 1, Section 8.9 and Appendix B, Item 9); and confirm that licensed materials which may become airborne will only be handled in the operational fume hoods.
- 4) Please indicate if licensed materials will be used in/on animals and/or field studies. If yes, please provide a description of the radiation safety program related to the use of licensed material in/on animals and/or field studies, as applicable.
- 5) Regarding the Am-241 sources, please confirm that they are foils or plated sources for use in Leybold Didactic GmbH Model 559-82-oZ and the licensee will use them in

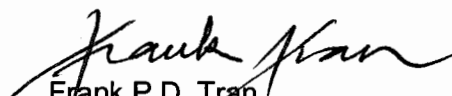
accordance with letters dated July 6, 2018 and September 4, 2018 which were previously tied down in License Conditions 19.G. and 19.H. in Amendment No. 11.

- 6) Provide a description of the radiation safety training program for individuals working in or frequenting the restricted areas (occupationally exposed individuals and ancillary personnel), including topics to be covered in the initial radiation safety training and annual refresher and how the training being assessed (quiz, exam, score to pass, etc.)
- 7) Please confirm that the licensee will use radiation survey instruments that will be calibrated before first use, annually thereafter, and after any repair by a vendor that is licensed by the NRC or an Agreement State to perform instrument calibrations.

Please provide the response in writing with an authorized signature and date by November 22, 2019. To facilitate proper handling of correspondences in our office, please reference Mail Control No. 612626 in your response. For your conveniences, you could fax the 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.

In accordance with Title 10 of the *Code of Federal Regulations* (CFR) 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. 21-32172-01
Docket No. 030-35007

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