

**From:** [Jones, Jacob F](#)  
**To:** [Alldredge, Casey](#)  
**Cc:** [Jessup, Chris B](#)  
**Subject:** [External\_Sender] RE: Exxon NRC license amendment, request for information  
**Date:** Thursday, March 18, 2021 3:54:38 PM  
**Attachments:** [DOA Letter Signed - 3-18-2021.pdf](#)

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Good Afternoon Mr. Alldredge,

Please see the attached delegation of authority memo, as requested. Please let me know if any further detail is required based on this letter, or pertaining to my correspondence below that was sent yesterday.

Thanks,

**Jake Jones, M.S., CIH**

Industrial Hygienist – Billings Refinery  
Medicine and Occupational Health

ExxonMobil Fuels and Lubricants Company  
700 ExxonMobil Road, Billings, MT, 59101  
Phone: 406-247-5250  
Mobile: 406-591-4963  
[Jacob.F.Jones@exxonmobil.com](mailto:Jacob.F.Jones@exxonmobil.com)

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**From:** Jones, Jacob F  
**Sent:** Wednesday, March 17, 2021 10:39 AM  
**To:** 'Alldredge, Casey' <Casey.Alldredge@nrc.gov>  
**Subject:** RE: Exxon NRC license amendment, request for information

Good Morning Mr. Alldredge,

The training I received was from VEGA Americas. Because of COVID-19, virtual training was the only option. Vega sent all participants 3D printed source holders that were utilized as training aids during the training. There was a day dedicated to hands on training where practical operation/monitoring of the nuclear gauges sources was focused on. For the hands on portion, we split out into zoom break-out rooms and the instructors visually verified that we were performing the activities correctly. The following elements were covered during the training:

- Shutter Operation
- Leak Testing demonstration (instructor verified that I performed the test correctly)
- Lock out procedures
- Routine maintenance (i.e. radiation surveys when shutter is closed for a maintenance

activity)

Additionally, as documented in the license amendment request. I walked the site with the RSO and looked at all of the sources and the different shutter types. We discussed how to close/open the shutters as well as locking them out for maintenance. We also discussed the appropriate actions during a fire or other emergency event (performing a survey and developing an exclusion zone (barricading) to make sure exposures are below the occupational limits to site workers).

I believe that these 2 items demonstrate compliance with NUREG 1556 Volume 4, Revision 1, Appendix D. Please let me know if you have any other questions or need any other documentation.

I will send you a delegation of Authority as soon as I can. I will have our refinery manager sign off on the delegation since he is the highest authority here at the Billings Refinery.

Thanks,

**Jake Jones, M.S., CIH**

Industrial Hygienist – Billings Refinery  
Medicine and Occupational Health

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**From:** Alldredge, Casey [<mailto:Casey.Alldredge@nrc.gov>]

**Sent:** Tuesday, March 16, 2021 4:17 PM

**To:** Jones, Jacob F <[jacob.f.jones@exxonmobil.com](mailto:jacob.f.jones@exxonmobil.com)>

**Subject:** Exxon NRC license amendment, request for information

**External Email - Think Before You Click**

Good afternoon Mr. Jones,

I am reviewing the amendment request, dated October 19, 2020, asking to designate you as the radiation safety officer. I noted that the radiation safety officer training that you completed was via zoom. Can you please provide me with information on how the course met the hands-on experience criteria discussed in NUREG 1556 Volume 4, Revision 1, Appendix D? I have attached the Appendix for your reference. Also, could you please provide a delegation of authority memo, signed by you and a member of management? I attached a model memo.

If you have any questions, please let me know.  
Thanks,

Casey Alldredge  
Health Physicist  
Materials Licensing and Decommissioning Branch  
Region IV, USNRC

## Delegation of Authority to Radiation Safety Officer

Memo to: Jacob Jones - Radiation Safety Officer

From: Chris Jessup – Refinery Manager ExxonMobil Billings Refinery, Fuels & Lubricants

Subject: Delegation of Authority

You, Jacob Jones, have been appointed radiation safety officer and are responsible for ensuring the safe 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 issue. 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 3 hours per week conducting radiation protection activities.



Chris Jessup; Refinery Manager  
ExxonMobil Billings Refinery, Fuels & Lubricants

3/18/2021

Date

I accept the above responsibilities,



Signature of Radiation Safety Officer (Jacob Jones)

3/18/2021

Date