

SAFETY EVALUATION REPORT

DOCKET NO.: 70-7029

LICENSE NO.: SNM-7005

LICENSEE: Defense Threat Reduction Agency

SUBJECT: DEFENSE THREAT REDUCTION AGENCY—LICENSE AMENDMENT FOR
CHANGE OF RADIATION SAFETY OFFICER (ENTERPRISE PROJECT
IDENTIFIER L-2022-LLA-0086)

I. INTRODUCTION

By letter dated May 31, 2022, the Defense Threat Reduction Agency (DTRA) submitted a license amendment request. Specifically, the change requested approval of a new radiation safety officer (RSO) and included the résumé of the recently hired person. The letter and enclosure is available in the Agencywide Documents Access and Management System under Accession Number ML22161A044. This request was supplemented with additional information dated July 7, 2022 (ML22195A118).

II. DISCUSSION

The regulation in Title 10 of the *Code of Federal Regulations* (10 CFR) Paragraph 70.23(a) states that an application for a license will be approved if the Commission determines, in part, that the applicant is qualified by reason of training and experience to use licensed material for the purpose requested. The U.S. Nuclear Regulatory Commission (NRC) staff finds the qualifications of the new RSO to be acceptable.

Specifically, the NRC staff makes the following findings:

The request asked to change the DTRA RSO from Mr. Daniel Mannis to Mr. Daniel Sowers. The basis for this review is Mr. Sowers' résumé. He is a certified health physicist (CHP) and has 20 years of experience within radiation safety programs in the U.S. Navy, with much of that experience in a leadership role. It was noted that he did not have specific experience with special nuclear materials, but otherwise had depth of experience indicating his qualifications to perform in the role of RSO for the DTRA license.

In addition to the applicable requirements of 10 CFR Part 70 covering SNM and the radiation protection requirements of 10 CFR Part 19 and Part 20, SNM licenses are reviewed and approved to include specific programmatic requirements of relevance to SNM including considerations of programs supporting criticality safety from 10 CFR Part 70, materials control and accounting of SNM, as covered by the requirements of 10 CFR Part 73 and physical security as found under 10 CFR Part 74. A question was raised to the DTRA management to address these parts. A teleconference was held on July 1, 2022, with the NRC reviewer, Mr. Sowers and his supervisor, Sherry Davis. Sherry Davis responded by committing to provide additional written basis for supporting Mr. Sowers in the role of RSO given the absence of SNM experience documented within his résumé. Subsequently on July 7, 2022, Sherry Davis provided a letter describing the logic for Mr. Sower's selection and position as RSO within the DTRA organization. The letter identified mentoring provided by the previous RSO, Mr. Daniel

Mannis, who still works in the DTRA organization as head of the Radiation Safety Committee, and Mr. Dave Bisson, CHP from Johns Hopkins Applied Physics Lab, who assisted and mentored Mr. Mannis in the writing of the original license, will continue to provide mentorship to both Mr. Mannis and Mr. Sowers. It was also identified that Mr. Sowers is listed as RSO on the DTRA State of Maryland (agreement state) Biproduct License No. 45-25551-01.

A review of Mr. Sower's résumé shows he has been employed as a health physicist for over 20 years in multiple labs and clinics with the appropriate level of responsibility and authority required for program administration. In addition, the supplemental information provided by the licensee on July 7, 2022, indicated Mr. Sowers is supported by members of the organization to the specific SNM-related requirements that the program encompasses. Fundamentally, he meets the requirements of RSO as identified in NUREG 1556, Volume 11, Section 8.7 for that of RSO. The NRC staff review concludes that Mr. Sowers is qualified by training and experience to perform the role of RSO in the DTRA organization.

III. ENVIRONMENTAL REVIEW

A proposed action is excluded from an environmental review under 10 CFR 51.22(c)(14)(v) if it is an amendment to a license issued pursuant to 10 CFR Part 70 authorizing the use of radioactive materials for research and development and for educational purposes. The change requested meets this requirement.

The NRC staff determined that the proposed action does not adversely impact public health and safety or the environment, and is categorically excluded from the requirement to conduct an environmental review. Therefore, in accordance with 10 CFR 51.22(c)(14)(v), neither an environmental assessment nor an environmental impact statement is warranted for this action.

IV. CONCLUSION

As stated above, the NRC staff finds that the new RSO is qualified by reason of training and experience to use licensed material for the education, research, and training activities authorized by the license.

V. PRINCIPAL CONTRIBUTORS

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