

Kelly, Jason

From: Kelly, Jason
Sent: Friday, May 20, 2022 1:26 PM
To: Clint.Livengood@ti-films.com
Cc: Lassman, Keith; Parker, Bryan; mike.michl@ti-films.com
Subject: U.S. NRC Materials License No. 13-13300-01

Mr. Livengood:

The letter dated May 5, 2022, signed by Lee Matheson, Sr. Operations Manager, requesting your appointment as Radiation Safety Officer (RSO) for U.S. Nuclear Regulatory Commission (NRC) Materials License No. 13-13300-01 has been assigned to Keith Lassman, Health Physicist, for review. Keith is currently out of the office attending training. In the interest of the timely completion of your request, I am reaching out to request additional or clarifying information needed to support the review of the request. This includes the following items:

1. The request identified that you are currently a radiation worker and have prior experience as a radiation worker. Clarify if you are qualified as an Authorized User of the Fixed Gauging Devices. If applicable, please provide documentation of your relevant training and experience as described below.

Section 8.7.2, "Authorized Users," of NUREG-1556, Volume 4, Rev. 1, "Consolidated Guidance About Materials Licenses: Program-Specific Guidance About Fixed Gauge Licenses," (the guidance) specifies that an Authorized User must have completed a manufacturer's course or an equivalent course meeting the criteria identified in Appendix D, "Criteria for Acceptable Training for Authorized Users and Radiation Safety Officers." Here is a link to the guidance: <https://www.nrc.gov/reading-rm/doc-collections/nuregs/staff/sr1556/v4/index.html>

If you attended one or more manufacturer's course(s), please provide a copy of the course completion certificate(s). If you completed a third-party course, please also include a course outline identifying the subjects covered in the course along with the name, title, and a brief summary of the course instructor's qualifications.

Note that individuals completing an online or virtual radiation safety training course typically must have attained separate hands-on training instruction in the following subjects:

- operating procedures (e.g., shutter checks and leak test sample collection);
- test runs of emergency procedures;
- routine maintenance (e.g., label replacement, corrosion abatement or gauge lubrication); and
- lock-out procedures.

The above is especially relevant for your licensed operations, in which I noted that your company is licensed for varying types of gauging devices including level and thickness gauges. If applicable, please provide documentation of supplemental instruction covering the above hands-on topics.

2. Lacking current qualification as Authorized User, further action on the request for your appointment as RSO may not be possible until you have attained the required training and experience. Clarify if the current named Radiation Safety Officer is available to fulfill the RSO Duties until you have completed the third-party course scheduled for August 2022. If this is the case, it may be appropriate to withdraw the request until you are able to provide documentation of all relevant training and experience.

Please response to this request within 15 calendar days. To ensure proper routing, please reference Materials License No. 13-13300-01, Docket No. 030-04411 and Control No. 631278 in the response letter. Please have the response

signed by a management representative. You are welcome to submit the response via email. My e-mail is Jason.Kelly@nrc.gov. Please include Keith on the carbon copy. His e-mail address is: Keith.Lassman@nrc.gov.

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