



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

December 7, 1999

Mr. Ben Baker
The Dow Chemical Company
1261 Building
Midland, MI 48667

SUBJECT: CHANGE OF RADIATION SAFETY OFFICER ON LICENSE STB-527

Dear Mr. Baker:

This is in response to your letter dated October 22, 1999, requesting a change in the Radiation Safety Officer (RSO) listed on License STB-527. The Nuclear Regulatory Commission's (NRC's) staff has processed a previous license amendment request, dated March 12, 1998, from Dow Chemical Company (DOW), to change the RSO listed on the license from Mr. Kenneth Baker to Mr. David Hunter. Mr. Hunter's training and experience was reviewed in accordance with 10 CFR 40.32(b), and the guidance in the NRC Regulatory Guide 10.4, "Guide for the Preparation of Applications for Licenses to Process Source Material."

The NRC staff has reviewed your current request dated October 22, 1999, to include Ms. Maria Sandow as the RSO in License STB-527, instead of Mr. Hunter, as previously proposed. Based on the staff's review, we are providing the enclosed comments. We request you to provide your response to our comments within 30 days from the date of this letter.

If you have any questions concerning this letter, please contact Sam Nalluswami of my staff at (301) 415-6694.

Sincerely,

A handwritten signature in cursive script, reading "Larry W. Camper", is positioned above the typed name.

Larry W. Camper, Chief
Decommissioning Branch
Division of Waste Management
Office of Nuclear Material Safety
and Safeguards

License No. STB-527
Docket No. 40-17

Enclosure: Comments on Dow's Request for Change in RSO

cc: D. Minnar, MIDEQ

COMMENTS ON DOW's REQUEST FOR CHANGE IN RSO

We understand that Ms. Maria Sandow has been the Health and Safety Officer (HSO) at Dow since 1993. As described in the RHSP, 3.2 Personnel Responsibilities, 3.22 Health and Safety Officer, page 3-1, the HSO's responsibilities include establishing health and safety policies, providing technical assistance to the RSO, assuring workers are medically fit, and authorizing appropriate monitoring, and safety procedures. Also, we understand that Ms. Sandow has a high school diploma and is working toward an Associates degree in Environmental Science (expected graduation in 2000). Ms. Sandow's resume indicates substantial work (over 25 years) in manufacturing and construction (mostly non-radiological) safety with limited experience in radiological safety.

Based on our review of the Ms. Sandow's resume, the following additional information is requested in order to complete the review of your license amendment request:

1. Describe radiation science course work (i.e., principles and practices of radiation protection, instrumentation, dosimetry and shielding, radiation biology, NRC regulations, etc.) that have been successfully completed as a candidate for the Associates degree, or any other related studies to supplement health physics knowledge.
2. Provide a copy of the 40-hour Radiation Safety Officer (RSO) class certificate completed by Ms. Sandow to include the course outline and class dates. Describe any additional classes and training completed in support of RSO qualifications. Also, provide copies of these certificates.
3. Describe experience in use of onsite field and laboratory radiation instrumentation, survey and sampling methods and evaluation of these results, and conducting radiation safety training and applicable drills. Describe specific responsibilities in subsurface soil sampling, free-release, and decommissioning activities. Given that health and safety encompasses both radiological and non-radiological aspects, describe what radiological health and safety policies were established while working in the capacity as the HSO. Describe experience in gamma spectroscopy, soil sample preparation and analyses, and evaluation of these results for the onsite laboratory.
4. Provide an updated Dow THORAD Organizational Chart in the Radiological Health and Safety Plan (RHSP) to reflect the proposed changes. As in Revision 01, the chart should clearly show the RSO's unimpeded path to management to ensure that health and safety concerns are addressed and resolved. Explain the apparent interactive role between the RSO and the Construction Superintendent positions as shown in the chart on page 3-2 in the September 1998 RHSP.
5. Explain how chain of custody for review and approval of the RHSP, standard operating procedures, and radiation work permits are conducted in absence of the HSO. Confirm that the Assistant RSO will be the next designated person, with signature authority for applicable health and safety issues, in the event the RSO is unavailable.
6. Since the HSO and RSO positions have some overlapping, but distinct responsibilities, it is not clear whether the HSO position will be filled when the license amendment request for change in RSO is approved, or if the HSO and RSO positions and responsibilities will be merged. NRC requests that this question is clarified.

ENCLOSURE