



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
REGION IV  
611 RYAN PLAZA DRIVE, SUITE 400  
ARLINGTON, TEXAS 76011-4005

January 28, 2005

PSC Consultants, LLC  
ATTN: Joseph Angelo G. Nolasco  
Radiation Safety Officer  
94-547 Ukee Street, Suite 210  
Waipahu, HI 96796

SUBJECT: RESPONSE TO LETTER DATED DECEMBER 28, 2004

This letter is to inform you that you are not required to notify this office when you designate an Alternate Radiation Safety Officer (ARSO). The Nuclear Regulatory Commission (NRC) does not recognize an ARSO position because of the requirement to list the name of the RSO on the license, to ensure that licensee management always has a responsible, qualified person identified and that the named individual knows of his or her designation as RSO. Nevertheless, it does not preclude you from designating an ARSO to assist with the duties and responsibilities of the RSO, however, the NRC does not recognize that position.

Additionally, you are not required to notify this office when you have added a certified nuclear gauge operator. License Condition 11.A., specifies that licensed material shall only be used by, or under the supervision and in the physical presence of, individuals who have received the training described in application dated October 22, 2000, and facsimile dated April 3, 2001. Therefore, because gauge operators are not specifically listed on your NRC radioactive materials license, you are not required to notify this office when you have designated a gauge operator. However, you must comply with the requirements in License Condition 11.A.

In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice," a copy of this letter will be available electronically for public inspection in the NRC Public Document Room or from the NRC document system (ADAMS). ADAMS is accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html>.

If you have any questions regarding this matter, please contact me at (817) 276-6552.

Sincerely,

/RA/

Rachel S. Browder, Health Physicist  
Nuclear Materials Licensing Branch

Docket: 030-31973  
License: 53-29020-01  
Control: 470366