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Daniel M. Gillen, Deputy Director, Decommissioning  
Directorate, Division of Waste Management and Environmental Protection

Subject: Proposed License Amendment No.16, Change of Radiation Safety Officer (RSO)

**Pathfinder Generating Plant**  
**Materials License 22-08799-02**

Xcel Energy is requesting a change to the above Materials License to revise the condition that identifies Herbert Giorgio as the RSO and replace it with a condition to internally designate a qualified RSO.

Mr. Giorgio currently works for a company that Xcel Energy has a material interest in. The facility where he works is being purchased by another company. When the purchase is complete, Mr. Giorgio will be transferred to the new company.

Xcel Energy, through discussions with the NRC staff, has determined that there is no requirement that a specific person be identified on the license as the RSO. Xcel Energy has qualified personnel available to fill the RSO position due to its ownership of two operating nuclear plants. As in the case of Mr. Giorgio, these personnel are sometimes subject to staffing emergent projects or supporting external efforts. It would therefore be more convenient and require less license changes to formally designate an RSO internally rather than name the RSO on the license itself.

Consequently, Xcel Energy is requesting that the license be amended to require an RSO, subject to the appropriate regulatory criteria, without including the RSO in name. The proposed changes are presented below.

Please revise Condition 11 as indicated below.

11. Licensed material shall only be possessed under the supervision of the Radiation Safety Officer (RSO).

Please include new Condition 12 as indicated below.

Condition 12

A. The RSO shall meet the education, training, and experience criteria specified by NUREG-1757, Vol. 1, Section 17.2.3.1 and be designated by the licensee in writing.

B: The licensee, without prior NRC approval, may appoint an RSO provided: i) the licensee maintains documentation demonstrating that the requirements of Condition 12A above are met, and ii) the NRC is informed of any vacancy in the RSO position by letter to the Regional Administrator, Region IV, within 30 days of the vacancy.

If you have any questions, please contact Charles Bomberger at 612-337-2183.

Regards,



Charles Bomberger  
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Cc:  
Herb Giorgio  
Joel Beres  
Tim Brown  
Pathfinder Project File