

The following additional information is needed to complete the review of your request.

1. Please resubmit your training commitment for gauge users as shown in Item 8.8, "Response from Applicant" in NUREG-1556, Volume 1, Revision 1 (see enclosed).
2. Also, please specify the amount of activity per source for each radionuclide and a total activity. For example, 9 millicuries of cesium-137 per source and a total activity 36 millicuries. 300 millicuries of americium-241 per source and a total activity of 600 millicuries.

Please send a facsimile of your response to the above within 5 days and refer to control 315351. Please call me at 630-829-9839 if you have any questions.

030-32149
21-26308-9

From the desk of:

Bill Reichhold

Bill Reichhold

Response from Applicant: Provide either of the following:

- Name of the proposed RSO;

AND EITHER

- Statement that: “Before obtaining licensed materials, the proposed RSO will have successfully completed one of the training courses described in Criteria in the section entitled ‘Individual(s) Responsible for Radiation Safety Program and Their Training and Experience – Radiation Safety Officer’ in NUREG-1556, Vol. 1, Rev. 1, ‘Consolidated Guidance about Materials Licenses: Program-Specific Guidance about Portable Gauge Licenses,’ dated September 2001”;

OR

- Alternative information demonstrating that the proposed RSO is qualified by training and experience.

Note: It is important to notify NRC, as soon as possible, of changes in the designation of the RSO.

Alternative responses will be reviewed against the criteria listed above.



8.8 ITEM 8: TRAINING FOR INDIVIDUALS WORKING IN OR FREQUENTING RESTRICTED AREAS (INSTRUCTIONS TO OCCUPATIONALLY EXPOSED WORKERS AND ANCILLARY PERSONNEL)

Regulations: 10 CFR 19.11, 10 CFR 19.12, 10 CFR 30.7, 10 CFR 30.9, 10 CFR 30.10, 10 CFR 30.33.

Criteria: Authorized users must have adequate training and experience. In the past, NRC has found successful completion of one of the following as evidence of adequate training and experience:



- Portable gauge manufacturer’s course for users; or
- Equivalent course that meets Appendix D criteria.

Discussion: The individuals using the gauges are usually referred to as authorized users. Authorized users have the responsibility to ensure the surveillance, proper use, security, and routine maintenance of portable gauges containing licensed material.

CONTENTS OF AN APPLICATION

Response from Applicant: Provide either of the following:

- The statement: "Before using licensed materials, authorized users will have successfully completed one of the training courses described in Criteria in the section entitled 'Training for Individuals Working In or Frequenting Restricted Areas' in NUREG-1556, Vol. 1, Rev. 1, 'Consolidated Guidance about Materials Licenses: Program-Specific Guidance about Portable Gauge Licenses,' dated September 2001";

OR

- A description of the training and experience for proposed gauge users.

Notes:

- Records of training should be maintained.
- Alternative responses will be evaluated against the criteria listed above.

8.9 ITEM 9: FACILITIES AND EQUIPMENT

No information need be submitted in response to this item. The key elements for portable gauge applicants are ensuring compliance with public dose limits and maintaining adequate security and control over the gauges. These issues are covered under "Radiation Safety Program – Public Dose" and "Radiation Safety Program – Operating and Emergency Procedures."

8.10 ITEM 10: RADIATION SAFETY PROGRAM

8.10.1 AUDIT PROGRAM

Regulations: 10 CFR 20.1101, 10 CFR 20.2102.

Criteria: Licensees must review the content and implementation of their radiation protection programs annually to ensure the following:

- Compliance with NRC and DOT regulations, and the terms and conditions of the license;
- Occupational doses and doses to members of the public are as low as reasonably achievable (ALARA) (10 CFR 20.1101); and
- Records of audits and other reviews of program content are maintained for 3 years.

Discussion: Appendix F contains a suggested audit program that is specific to the use of portable gauges and is acceptable to NRC. All areas indicated in Appendix F may not be applicable to every licensee and may not need to be addressed during each audit.

Appendix D

Criteria for Acceptable Training Courses for Portable Gauge Users

COURSE CONTENT

- 1.5 to 2 hours of radiation safety and regulatory requirements, emphasizing practical subjects important to safe use of the gauge; radiation vs. contamination; internal vs. external exposure; concept of time, distance, and shielding to minimize exposure; control and surveillance of gauges; location of sealed source within the portable gauge; inventory; recordkeeping; incidents; licensing and inspection by regulatory agency; need for complete and accurate information; employee protection; deliberate misconduct.
- 1.5 to 2 hours of practical explanation of portable gauge theory and operation; operating, emergency, maintenance, and transportation procedures; and field training emphasizing radiation safety and including test runs of setting up and making measurements with the gauge, controlling and maintaining surveillance over the portable gauge, performing routine cleaning and lubrication, packaging and transporting the gauge, storing the gauge, and following emergency procedures.

COURSE EXAMINATION

- At least a 70-percent score on a 25-to-50-question, closed-book written test
 - Emphasis on radiation safety of portable gauge storage, use, sealed source location, maintenance, and transportation, rather than the theory and art of making portable gauge measurements;
 - Review of correct answers to missed questions with prospective gauge user immediately following the scoring of the test.

COURSE INSTRUCTOR QUALIFICATIONS

Instructor should have either:

- Bachelor's degree in a physical or life science or engineering;
- Successful completion of a portable gauge user course;
- Successful completion of an 8-hour radiation safety course; and
- 8 hours hands-on experience with portable gauges.

OR

- Successful completion of portable gauge user course;
- Successful completion of 40-hour radiation safety course; and
- 30 hours of hands-on experience with portable gauges.

Note: Licensees should maintain records of training.

TRANSMISSION VERIFICATION REPORT

TIME : 06/02/2006 10:17
NAME : USNRC
FAX : 5308299782
TEL : 5308299782

DATE, TIME	06/02 10:15
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RESULT	OK
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TELEFAX TRANSMITTAL

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(Including this page)

SEND TO: John Fortier, Radiation Safety Officer

LOCATION: Bacco Construction Company

FAX NUMBER: (906) 774-1160 **VERIFY BY CALLING**
SENDER

FROM:
(SENDER) **Bill Reichhold**

TELEPHONE NUMBER (630) 829-9839 FAX NUMBER (630) 515-1259
or
(630) 829-9782

If you do not receive the complete fax transmittal, please contact the sender as soon as possible at the telephone number provided above.



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MESSAGE

Please see accompanying documents.

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