

APR 5 1982

FMCL:PG
030-10362
29-01022-11

Department of the Army
U.S. Army Communications and
Electronics Command
ATTN: DRSEL-SF
Fort Monmouth, NJ 07703

Gentlemen:

This refers to your letter dated March 15, 1982 with an attached Memorandum dated March 10, 1982 and signed by Bernard M. Savaiko. You requested an interpretation of Condition 12 in License No. 29-01022-11.

Condition 12 specifies that all persons who use or supervise the use of the krypton 85 sources must be trained in the provisions of technical Manual (TM) 3-6665-264-10. Supplement B. of the application dated September 4, 1979 specifies that users are required to be familiar with the provisions of this manual. Also, Condition 12 specifies that the licensee (the Army) is authorized to designate any person as an individual user if he meets the training requirements described above. We would assume that since Item 7a. in TM 3-6665-264-10 specifies that "The handling, storage, transfer, use, and disposal of the radioactive test samples should be under the control of the installation activity (local) radiological protection officer (RPO)".... each individual user at each activity is designated by the RPO. In any event, someone should have a listing of individual users along with documentation showing they are familiar with the provisions of TM 3-6665-264-10.

In view of the above, the answer to question 3 in your letter is yes. The answer to question 4 is also yes, but the Army would be required on request (by an NRC inspector for example) to produce some documentation showing that each individual user is familiar with TM 3-6665-264-10. A simple type of acceptable document would be a list of names of individual users at each activity which has been signed by the RPO who by doing so specifies that the individuals listed thereon are, in the opinion of the RPO, familiar with TM 3-6665-264-10.

C/22

If you have any further questions concerning this matter, please let me know.

Sincerely,

Paul R. Guinn
Material Licensing Branch
Division of Fuel Cycle and
Material Safety

cc: Department of the Army
Headquarters, US Army Material Development
and Readiness Command
ATTN: DRCSF-P
5001 Eisenhower Avenue
Alexandria, Virginia 22333

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HEADQUARTERS US ARMY MATERIEL DEVELOPMENT AND READINESS COMMAND
5001 EISENHOWER AVENUE, ALEXANDRIA, VA. 22333

DRCSF-P

15 March 1982

Director
Nuclear Material Safety and Safeguards
ATTN: Radioisotopes Licensing Branch, Mr. John Hickey
US Nuclear Regulatory Commission
Washington, DC 20555

Dear Mr. Hickey,

Forwarded is US Army Communications-Electronics Command letter requesting an official NRC interpretation of Condition 12 of Byproduct Material License Number 29-01022-11.

Please acknowledge receipt of correspondence on inclosed DA Form 209 Mail Reply Card.

Sincerely,

DARWIN N. TARAS
Chief, Health Physics
Safety Office

2 Incl
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