Memorandum

Environmental
Resources
Management

3352 128th Avenue
Holland, MI 49424-9263
(616) 399-3500
(616) 399-3777 (fax)

To: Loren J. Hueter

Company: United States Nuclear Regulatory Commission

From: Dan Rusiecki (DRR)

File number: 0004065

Date: 28 November 2006

Subject: Change of Radiation Safety Officer - Control No. 315817

ERM

Per our telephone conversation of 21 November 2006, attached is our response to items referenced in your Conversation Record dated 21 November 2006. The items with responses are as follows:

1) "Need a signed statement jointly signed by both him and a higher level of management acknowledging his designation as the replacement Radiation Safety Officer."

See attached letter.

2) "requested a brief description of his portable gauge related activities since his receipt of the Troxler training."

Training of the Troxler nuclear testing gauge was conducted in March 1987 for Granger & Associates, Inc. of St. Ignace, Michigan. Upon completion of training, I worked for Granger & Associates on construction projects during the summer of 1987 and 1988, using the Troxler gauge at least once a day, five days per week. In 1990, I was hired by Dell Engineering, Inc. of Holland, Michigan (currently Environmental Resources Management, Inc.) and used the Troxler gauge on an average of once per year. Use of the Troxler gauge was on construction and landfill projects.

3) "we discussed the need for the licensee to specify a total possession limit, to be added to License Item 8 for each radioisotope (Cesium-137 and Americium-241) listed in License Item 6 of the subject license."

Currently we have two Troxler Nuclear gauges under License Number 21-25861-01. Gauge No. 16250 has CS-137, 0.30 GBq (8 mCi) with AM-241:Be, 1.48 GBq (40 mCi). Gauge No. 16251 has CS-137, 0.30 GBq (8 mCi)

with AM-241:Be, 1.48 GBq (40 mCi). The total minimum possession limit for the two gauges would be CS-137, 0.60 GBq (16 mCi) and AM-241:Be, 2.96 GBq (80 mCi). Therefore, the total maximum possession limit we would need, assuming the potential for occasional rental of a third Troxler gauge, would be CS-137, 0.90 GBq (24 mCi) and AM-241:Be, 4.44 GBq (120 mCi).

4) "There would be a modification to license Condition 18 to reflect additional physical controls to secure portable gauges, based on revisions to 10 CFR Part 30"

See attached for the revision of Section 4.0 Transporting Gauges of our Radiation Safety Program for the additional physical controls to secure portable gauges.

If you should have any questions, please contact Steve Koster at 616-738-7306 or me at 616-738-7322.

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28 November 2006
Reference: Material License #21-25861-01

Mr. Loren J. Hueter
U.S. Nuclear Regulatory Commission
Material Licensing Section
801 Warrenville Road
Lisle, Illinois 60532-4351

Dear Mr. Hueter:

Environmental Resources Management, Inc. (ERM) hereby informs you of a change in designation of our Radiation Safety Officer to Daniel R. Rusiecki. This change is effective immediately. He has completed an appropriate training course presented by Troxler Electronic Laboratories, Inc. Copies of the certificate of completion and our Radiation Safety Program have been included with the original change of Radiation Safety Officer letter dated 27 October 2006.

If you should have any questions, please contact Steve Koster at (616) 738-7306 or Dan Rusiecki at (616) 738-7322.

Sincerely,

Daniel R. Rusiecki
Project Engineer

Steve J. Koster, P.E.
Branch Manager

DRR:rmv/SJK
cc: File

4.0 TRANSPORTING GAUGES

a. Users shall ensure that gauges are secured at all times. When a gauge is transported, there shall be a minimum of two independent physical controls that form tangible barriers to secure portable gauges from unauthorized removal, whenever portable gauges are not under the control and constant surveillance of the licensee (*i.e.*, chain and lock the gauge in the vehicle, use of tie locks on the gauge case, and locking the vehicle while personnel are away from the vehicle).

b. The gauge shall remain in the safety case provided for the gauge at all times during transportation and when the gauge is not in use.

c. At all times during transport, the operator shall have a properly completed Bill of Lading for each gauge.