



October 16, 2007

Colleen C. Casey, Materials Licensing Branch  
U.S. NRC Region III  
2443 Warrenville Road  
Suite 210  
Lisle, Illinois 60532-43252

Subject: Amendment to Add Timothy J. Schwaegerl As An Assistant RSO  
License: 22-00057-61

Dear Ms. Casey:

This letter is to request that Mr. Timothy J. Schweagerl be added to the Brookings irradiator license as an Assistant Radiation Safety Officer.

Mr. Schwaegerl is employed at the 3M Brookings facility as an Engineering Technologist within the Environmental, Health & Safety (EHS) department. He reports directly to Mr. Kostas T. Kaounas, the Brookings RSO. After Tim has worked as an Assistant RSO, we anticipate making a future request elevating him to the position of RSO. To ensure continuity, we expect to retain Mr. Kaounas on the license as the Alternate RSO.

Mr. Schweagerl has worked in the EHS department for 2 years. He has been involved assisting the RSO during this entire time. Tim completed Corporate Health Physics S8 Initial Authorized User training in May 2007. And he has been cleared to receive SGI-M.

3M commits that Mr. Schweagerl will complete the rest of his Authorized User training prior to commencing his duties as the Assistant RSO.

Duties of an RSO are provided in Nureg-1556 Vol. 6 Appendix H. As Assistant RSO, Mr. Schweagerl will assist the RSO in these duties. Specifically:

- Stopping activities that the RSO considers unsafe.
- Keeping exposures ALARA.
- Developing, maintaining, distributing, and implementing up-to-date operating and emergency procedures.
- Ensuring that individuals associated with irradiator operations are properly trained and evaluated.
- Ensuring that non-routine operation for irradiators are consistent with the limitations in the license, the Sealed Source and Device Registration

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Certificate(s), and the manufacturer's written recommendations and instructions.

- Analyzing potential safety consequences of non-routine operations before conducting any such activities that have not been previously analyzed.
- Ensuring non-routine operations are performed by the manufacturer or person specifically authorized by the NRC or an Agreement State to perform those operations.
- Ensuring that personnel monitoring devices are used and exchanged at the proper intervals, and records of the results of such monitoring are maintained by the licensee.
- Maintaining documentation that unmonitored individuals are not likely to receive, in one year, a radiation dose in excess of 10% of the allowable limits or provide personnel monitoring devices.
- Notifying proper authorities of incidents such as damage to or malfunction of irradiator, fire, loss or theft of license materials.
- Investigating emergencies and abnormal events involving the irradiators (e.g., malfunctions or damage), identifying cause(s), implement appropriate and timely corrective action(s).
- Performing radiation safety program audits at least every 12 months and developing, implementing, and documenting timely corrective actions.
- Ensuring transport of licensed material according to all applicable DOT requirements.
- Ensuring proper disposal of licensed material.
- Maintaining appropriate records associated with irradiator operations.
- Maintaining an up-to-date license and timely submission of amendment and renewal requests.
- Ensuring that when the licensee identifies violations of regulations or license conditions or program weaknesses, corrective actions are developed, implemented, and documented.
- All other specific commitments contained in the irradiator license (including commitments contained in letters/communications incorporated by reference into the license).

If you need further information regarding this request, please contact Nick Bates of this office at (651) 737-1019.

Sincerely,

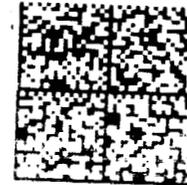


Frederick B. Entwistle, Manager  
3M Corporate Health Physics

3M Corporate Health Physics  
3M Center, Building 0220-06-A  
St. Paul, MN 55144-1000



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Colleen C. Casey  
Materials Licensing Branch  
USNRC, Region III  
2443 Warrenville Road, Suite 210  
Lisle, IL 60532-~~XXXX~~

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