

**Albany International Corp.**  
300 Albany Street  
St. Stephen, South Carolina 29479 USA  
Tel: (864) 630-1068  
Fax: (866) 842-3288  
Voice mail: (800) 544-0429, Ext 2429  
E-mail: Norm.Bell@albint.com



**Norman E. Bell**  
Corporate Radiation Safety Officer

U.S. Nuclear Regulatory Commission  
Region III  
2443 Warrenville Road STE 210  
Lisle, IL 60532-4352  
Attention James Mullauer:

November 7, 2007

**Subject:** Request amendment to Radioactive Materials License

**Reference:** Radioactive Materials License # 39-32289-01

Dear Mr. Mullauer:

Albany International Corp. maintains Radioactive Materials License within your regulating jurisdiction for the purpose of possession, transport, use and storage of portable test instruments that contain an Americium-241 sealed source. We hereby request your consideration to amend the license to authorize planned changes within our organization, which necessitate the amendment.

The explanation for this change is provided below along with an illustration of both the present text and the amendment. Our requested changes follow:

**Amendment Request** – Organizational changes are being made that necessitate the replacement of our Corporate Radiation Safety Officer. Mr. Norman E. Bell will be replaced by Mr. Kevin M. Struna. Mr. Struna is well qualified to assume this important role by virtue of four training classes for which certificates of successful completion are attached. The certificates are provided as Appendix items 1A, 1B, 1C and 1D. Therefore, we request the amendment to our license as follows:

Present text reads as follows:

Item # 11B –The Radiation Safety Officer for this license is Norman E. Bell.

Requested amendment will read as follows:

Item # 11B –The Radiation Safety Officer for this license is Kevin M. Struna

We understand that there is no amendment fee associated with this request. If that has changed, please advise me.

If you have questions or require any clarification, you may contact me by telephone at (864) 630-1068 or Kevin at (843) 567-5518. Thank you for your prompt attention to this matter.

Sincerely,

*Norman E Bell*

Norman E. Bell  
Corporate Radiation Safety Officer

*Kevin M Struna*

Kevin M. Struna  
Corporate Radiation Safety Officer

Attachments: Letter from Mike Joyce Delegation of Authority 11/5/2007  
Albany International Rad Safety Organization Chart  
Albany International Emergency Procedures

Appendix: 2A - K Struna – Certificate – Albany International (4 hours)  
2B - K Struna – Certificate – Radiation Safety (40 hours)  
2C - K Struna – Certificate – Humboldt Scientific (8 hours)  
2D - K Struna – Certificate – NDC Infrared Engineering (8 hours)

Cc: Cliff Smith  
Steve Collins  
Ron Bengé  
Stan Oakleaf  
Jim Scott  
File – License Copy

Albany International Corp.  
Post Office Box 1907  
Albany, New York 12201-1907 USA  
Tel.: 518 445-2268  
Fax: 518 445-2264  
E-mail: mike.joyce@albint.com

**ALBANY**  
INTERNATIONAL

**Michael J. Joyce**  
Group Vice President – PMC Americas

[Radioactive Material Regulating Jurisdictions]

November 5, 2007

**Subject:** Delegation of authority to RSO for signing license related documents

To Director, Office of Radiation Control:

As Group Vice President – PMC Americas of Albany International Corp., I have delegated authority to Kevin M. Struna for administrative matters pertaining to our portable gauge Radioactive Materials Licenses. Mr. Struna has management approval to: sign license documents; submit application for license; initiate amendment requests; pay associated fees; and handle all related administrative matters with regulating jurisdictions on behalf of Albany International Corp. Mr. Struna has the qualifications, which shall be documented by the attached letter plus his certificates of training, to relieve Norman E. Bell of this responsibility as Corporate Radiation Safety Officer.

I understand that license applications as well as requests for amendments to an existing license often require signature by a representative of upper management. This document is signed by a member of upper management who has independent authority to delegate tasks, reassign job duties and/or provide finances, when necessary, to support an effective Radiation Safety Program.



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Michael J. Joyce  
Group VP – PMC Americas

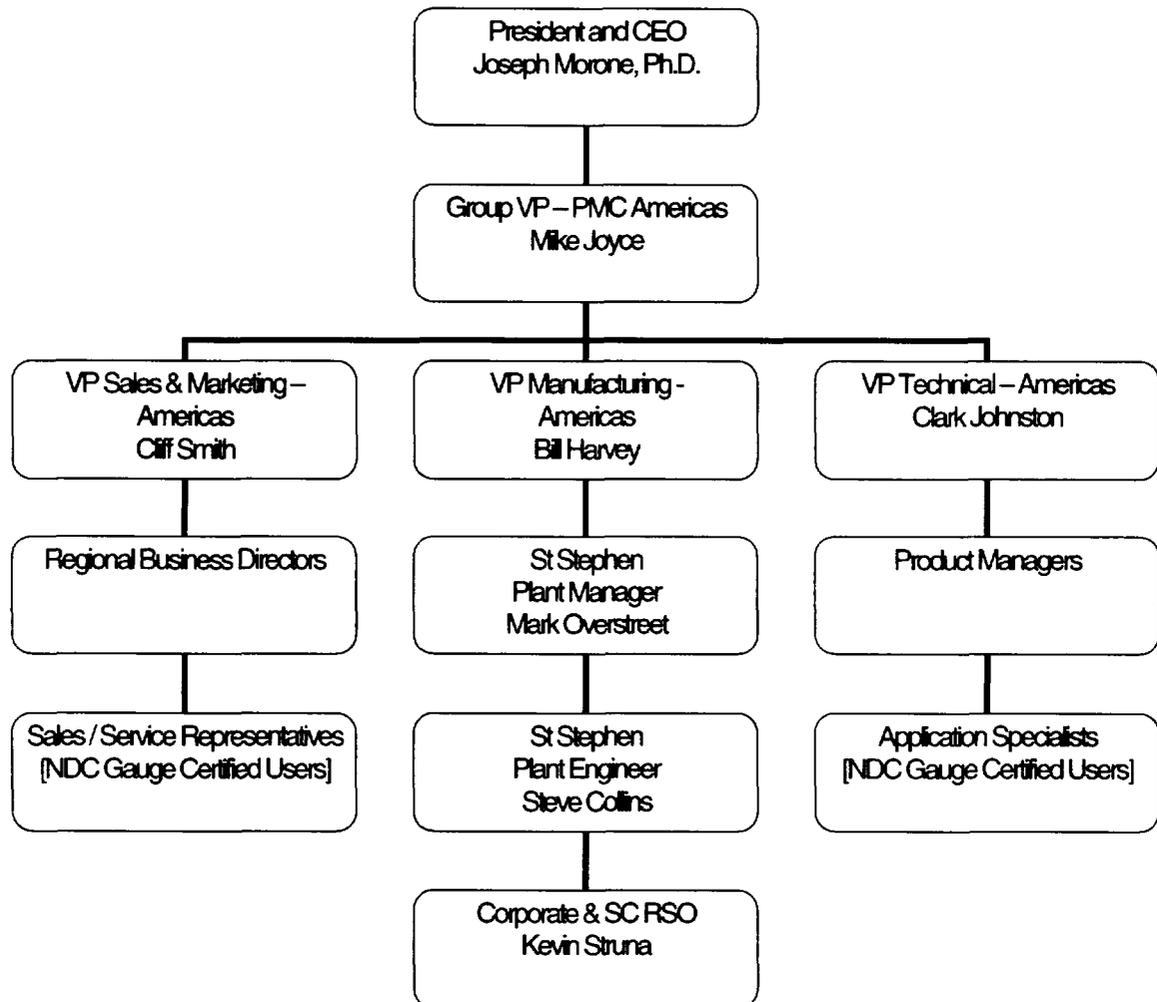
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October 26, 2007  
Date

## RAD Safety Program Personnel – Chain of Command

**Management Control** - The portable NDC Model 104 gamma gauge is a diagnostic tool used to make mass measurements at various points on a papermaking machine. It is part of a service program offered to our customers. Senior management has made their commitment to fully support the Radiation Safety Program. The Corporate Radiation Safety Officer in consultation with America's management team [consisting of Vice President-Sales & Marketing, Vice President-Manufacturing, Vice President-Technical, and Regional Business Directors] administers the program. The service team for a given customer consists of Sales / Service Representatives and Application Specialists who are qualified NDC Gauge users.

### Chain of Command for Radiation Safety Program - Albany International – USA



## Portable Gauge Emergency Procedures (NDC Model 104 P and 104 PD)

This procedure should be followed if our Americium-241 source is breached, damaged, lost / stolen, or when the shutter fails to block emissions. The objective is to minimize radiation exposure and obtain assistance from RSOs / authorities. Because the sealed source is double encapsulated in stainless steel, it is unlikely that the source will be breached. Containment & minimization of exposure are primary for compliance with our safety policy – ALARA. If possible, a helper should perform security functions and limit access to physical area. This procedure should be followed for actual or suspected damage to source and / or shutter, as follows:

**NOTE: For lost or stolen gauges start with item # 7 below**

1. Send helper to call local RSO / HAZMAT authority and restrict access by unauthorized personnel.
2. Rope off the area involved [about 10 feet] and stay on-site until relieved by hazardous materials authority.
3. Locate the sealed source and check for any contamination using the Geiger Counter in our carrying case.
4. When safe to do so, remove the source / probe head with shovel, tongs and / or gloves, placing the entire probe-head in a plastic bag [or in any container with a tight lid] to contain the radioactive element.
5. Isolate the sealed source / probe-head in a limited-access, secure area. Use gloves to perform a leak test - wipe probe with cotton swab moistened by isopropyl alcohol. Seal the wipe sample swab in an envelope and identify the content for test by NDC. If the shutter is missing, create a lead shield and test for "0" exposure with Geiger Counter.
6. Pack probe securely for return to NDC Infrared, then personnel involved should thoroughly wash their hands.
7. **Call Corporate Radiation Safety Officer**, site-RSO as back up, or our NDC Coordinator for advice and help:

Kevin Struna/ Corporate RSO & site RSO-SC Office: (843) 567-5518 Mobile: (843) 693-7371	Steve Collins / Backup for Corp RSO Office: (843) 567-5653 Mobile: (843) 693-7965
Maurice Rollins / site RSO – Alabama Office: (334) 613-7665	Dave Krebs / site RSO - New York Office: (518) 285-4280 Mobile: (518) 588-0614
Lou Mitchell / site RSO – Arkansas Mobile: (870) 245-7710	Eric Howell / RSO – North Carolina Mobile: (919) 618-8253
Matthew Brown / site RSO - Georgia Mobile: (912) 663-6038	Scott Ruhland / site RSO – Washington Mobile: (360) 431-5416
Ben Gilliland / site RSO – Louisiana Mobile: (985) 516-9144	Ron Buck / RSO – Wisconsin Office: (920) 729-7398 Mobile: (920) 213-9578
Tony Dowler / site RSO – Maine Mobile: (207) 441-1944	Open [future K Doyle] / RSO – Minnesota Mobile: TBD

8. If RSO is not available, call NDC Infrared Engineering collect during normal West Coast working hours. Contact Frank Aguirre - RSO at (626) 939-3859 or Service Dept. at (626) 939-3855 for advice & help. On weekends or after normal working hours: Call NDC at (626) 960-3300 and leave a message.
9. **For breached source, stolen source or loss of shutter contact regulating jurisdiction [attachment B].**
10. If unable to reach others, contact **CHEMTREC (800) 424-9300 – Emergency Service 24 hrs / day.**

**CERTIFICATE OF RADIATION  
SAFETY TRAINING**

**ALBANY**  
*INTERNATIONAL*

awarded to

**KEVIN STRUNA**

**This is to certify that Kevin has successfully completed our 4-hour certification training in basics of radiation, radiation safety, hazmat training and use of the NDC Systems portable nuclear gauge. The course was instructed by Norm Bell, Corporate RSO, on July 25, 2007 in St. Stephen, SC.**

**Dated: July 2007**

*Norman E Bell*

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**Radiation Safety  
Officer**

# Certificate of Training

Awarded To

*Kevin Struna*

Recognizing completion of 40 hours of specialized instruction in

## Radiation Safety Officer

**August 24, 2007**

Presented By

*Radiation Safety Academy*

481 North Frederick Avenue, Suite 302

Gaithersburg, Maryland 20877

AAHP has awarded this course 32 Continuing Education Credits, 2007-00-031

ABIH has awarded this course 4.5 CM Points, CM Approval # 07-550

ARRT and SNMT has awarded this course 52.25 CEHs, 024073-024077



Raymond Johnson, MS, PE, FHPS, CHP  
Academy Director





**HUMBOLDT**

# HUMBOLDT SCIENTIFIC, INC.

## RSO Certification

*Kevin Struna*

### HAS SUCCESSFULLY COMPLETED A CERTIFIED RADIATION SAFETY OFFICER COURSE

Subjects included were:

*RSO Duties and Responsibilities*

*Radiation Safety Practices*

*Regulatory Requirements*

*Dose/Shielding Requirements*

*Accidents/Storage*

*Regulatory Guidance (NUREG-1556, Vol. 1)*

*Transportation/HAZMAT Requirements*

*Risk*

*ALARA*

*Radiation Measurement*

*Operating and Emergency Procedures*

*Calibration and Maintenance*

*Record Keeping*

Date of Training: **September 18, 2007**

Location: **Charleston, SC**

Certificate Number: **7427**

HAZMAT Expiration Date: **September 18, 2010**

  
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Instructor: Keith Earnshaw

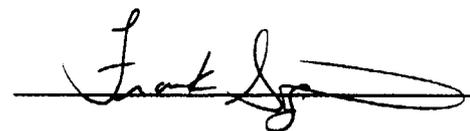
Humboldt Scientific, Inc.

551-D Pylon Drive

Raleigh, NC 27606

## CERTIFICATE OF TRAINING

*This is to certify that Kevin M. Struna of Albany International has successfully completed a course in the use, maintenance and repair of the NDC measurement sensors - Models 104, 104P and 104PD. This course was completed at Irwindale, California on August 17, 2007.*



*Frank Aguirre  
Radiation Safety Officer  
NDC Infrared Engineering*

*Dated: August 17, 2007*

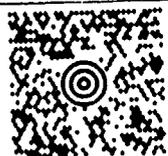
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**UPS 2nd Day Air.**

ELAINE JOHNSON  
(843) 567-3243 5526  
ALBANY INTERNATIONAL  
300 ALBANY STREET  
SAINT STEPHEN SC 29479

LTR 1 OF 1

SHIP TO:  
JAMES MULLAUER  
U.S. NUCLEAR REGULATORY COMMISSION  
2443 WARRENVILLE ROAD SUITE 210  
LISLE IL 60532-4352



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UPS 2ND DAY AIR

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BILLING: P/P

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LISLE IL 60532-3873  
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