United States Department of Commerce
National Oceanic and Atmospheric Administration
National Ocean Service
Center for Coastal Fisheries and Habitat Research (CCFHR)
101 Pivers Island Road
Beaufort, NC 28516-9722

Br. 2

July 3, 2008

U.S. Nuclear Regulatory Commission (NRC)
Commercial and R&D Branch
Division of Nuclear Materials Safety
Region 1
King of Prussia, PA 19406

03005594

Dear Madam or Sir:
We are filing an amendment to our Nuclear Regulatory License, No. 32-00426-02, due to the abrupt departure of our listed Radiation Safety Officer.

We propose to Letter Appoint Rance Hardison as interim CCFHR Radiation Safety Officer as we decommission our Radiation Safety Program. Rance Hardison is currently listed as a radiation material user on Page 2, item 12 of our NRC license.

Rance Hardison has been trained, tested and successfully completed specialized instruction in Department of Transportation and Nuclear Regulatory Commission requirements for Shipping and Receiving Radioactive Material by receipt of an August 29, 2003 Certificate of Training by completing 40 hours of said specialized instruction to be a Radiation Safety Officer. The training was provided by the Radiation Safety Academy of Gaithersburg, Maryland.

Based on the above stated qualifications we ask that you amend our NRC license to Letter Appoint Rance Hardison as the interim CCFHR Radiation Safety Officer.

If you need additional information or clarification please feel free to contact Joseph Bizzell, Safety Officer, at (252) 728-8718.

Best regards,

David Johnson, Ph.D
CCFHR Center Director

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2008 JUL 14 AM 8:40

REC'D IN LAT 7/9/08 via fax

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NMSS/RGN1 MATERIALS-002

Enclosure: NRC Form 314A (RSO)
Rance Hardison Radiation Safety Officer Certificate of Training
Rance Hardison Specialized Instruction Certificate of Training
Rance Hardison Proposed Letter of Interim Appointment

NRC FORM 313A (RSO) (2-2007) | U.S. NUCLEAR REGULATORY COMMISSION

RADIATION SAFETY OFFICER TRAINING AND EXPERIENCE AND PRECEPTOR ATTESTATION [10 CFR 35.50]

APPROVED BY OMB: NO. 3150-0120
EXPIRES: 10/31/2008

Name of Proposed Radiation Safety Officer

Rance Hardison

Requested Authorization(s) *The license authorizes the following medical uses (check all that apply)*:

☐ 35.100 ☐ 35.200 ☐ 35.300 ☐ 35.400 ☐ 35.500 ☐ 35.600 (remote afterloader)

☐ 35.600 (teletherapy) ☐ 35.600 (gamma stereotactic radiosurgery) ☐ 35.1000 (_____)

PART I -- TRAINING AND EXPERIENCE
(Select one of the four methods below)

*Training and Experience, including board certification, must have been obtained within the 7 years preceding the date of application or the individual must have obtained related continuing education and experience since the required training and experience was completed. Provide dates, duration, and description of continuing education and experience related to the uses checked above.

☑ **1. Board Certification**

a. Provide a copy of the board certification.

b. Use Table 3.c. to describe training in radiation safety, regulatory issues, and emergency procedures for all types of medical use on the license.

c. Skip to and complete Part II Preceptor Attestation.

OR

☐ **2. Current Radiation Safety Officer Seeking Authorization to Be Recognized as a Radiation Safety Officer for the Additional Medical Uses Checked Above**

a. Use the table in section 3.c. to describe training in radiation safety, regulatory issues, and emergency procedures for the additional types of medical use for which recognition as RSO is sought.

b. Skip to and complete Part II Preceptor Attestation.

OR

☐ **3. Structured Educational Program for Proposed Radiation Safety Officer**

a. Classroom and Laboratory Training

Description of Training	Location of Training	Clock Hours	Dates of Training*
Radiation physics and instrumentation			
Radiation protection			
Mathematics pertaining to the use and measurement of radioactivity			
Radiation biology			
Radiation dosimetry			
Total Hours of Training:			

RADIATION SAFETY OFFICER TRAINING AND EXPERIENCE AND PRECEPTOR ATTESTATION (continued)

3. Structured Educational Program for Proposed Radiation Safety Officer (continued)

b. Supervised Radiation Safety Experience
(If more than one supervising individual is necessary to document supervised work experience, provide multiple copies of this section.)

Description of Experience	Location of Training/ License or Permit Number of Facility	Dates of Training*
Shipping, receiving, and performing related radiation surveys		
Using and performing checks for proper operation of instruments used to determine the activity of dosages, survey meters, and instruments used to measure radionuclides Securing and controlling byproduct material		
Using administrative controls to avoid mistakes in administration of byproduct material		
Using procedures to prevent or minimize radioactive contamination and using proper decontamination procedures Using emergency procedures to control byproduct material		
Disposing of byproduct material Licensed Material Used (e.g., 35.100, 35.200, etc.)+		

\+ Choose all applicable sections of 10 CFR Part 35 to describe radioisotopes and quantities used: 35.100, 35.200, 35.300, 35.400, 35.500, 35.600 remote afterloader units, 35.600 teletherapy units, 35.600 gamma stereotactic radiosurgery units, emerging technologies (provide list of devices).

RADIATION SAFETY OFFICER TRAINING AND EXPERIENCE AND PRECEPTOR ATTESTATION (continued)

3. Structured Educational Program for Proposed Radiation Safety Officer (continued)

b. Supervised Radiation Safety Experience (continued)

(If more than one supervising individual is necessary to document supervised work experience, provide multiple copies of this section.)

Supervising Individual	License/Permit Number listing supervising individual as a Radiation Safety Officer

This license authorizes the following medical uses:

- ☐ 35.100 ☐ 35.200 ☐ 35.300 ☐ 35.400
- ☐ 35.500 ☐ 35.600 (remote afterloader) ☐ 35.600 (teletherapy)
- ☐ 35.600 (gamma stereotactic radiosurgery) ☐ 35.1000 (_____)

c. Describe training in radiation safety, regulatory issues, and emergency procedures for all types of medical use on the license.

Description of Training	Training Provided By	Dates of Training*
Radiation safety, regulatory issues, and emergency procedures for 35.100, 35.200, and 35.500 uses		
Radiation safety, regulatory issues, and emergency procedures for 35.300 uses		
Radiation safety, regulatory issues, and emergency procedures for 35.400 uses		
Radiation safety, regulatory issues, and emergency procedures for 35.600 - teletherapy uses		
Radiation safety, regulatory issues, and emergency procedures for 35.600 - remote afterloader uses		
Radiation safety, regulatory issues, and emergency procedures for 35.600 - gamma stereotactic radiosurgery uses		
Radiation safety, regulatory issues, and emergency procedures for 35.1000, specify use(s):		

RADIATION SAFETY OFFICER TRAINING AND EXPERIENCE AND PRECEPTOR ATTESTATION (continued)

3. Structured Educational Program for Proposed Radiation Safety Officer (continued)

c. Training in radiation safety, regulatory issues, and emergency procedures for all types of medical use on the license (continued)

Supervising Individual *If training was provided by supervising RSO, AU, AMP, or ANP. (If more than one supervising individual is necessary to document supervised training, provide multiple copies of this page.)*	License/Permit Number listing supervising individual

License/Permit lists supervising individual as:

☐ Radiation Safety Officer ☐ Authorized User ☐ Authorized Nuclear Pharmacist
☐ Authorized Medical Physicist

Authorized as RSO, AU, ANP, or AMP for the following medical uses:

☐ 35.100 ☐ 35.200 ☐ 35.300 ☐ 35.400
☐ 35.500 ☐ 35.600 (remote afterloader) ☐ 35.600 (teletherapy)
☐ 35.600 (gamma stereotactic radiosurgery) ☐ 35.1000 (_____)

d. Skip to and complete Part II Preceptor Attestation.

OR

☐ **4. Authorized User, Authorized Medical Physicist, or Authorized Nuclear Pharmacist identified on the licensee's license**

a. Provide license number.

b. Use the table in section 3.c. to describe training in radiation safety, regulatory issues, and emergency procedures for all types of medical use on the license.

c. Skip to and complete Part II Preceptor Attestation.

PART II – PRECEPTOR ATTESTATION

Note: This part must be completed by the individual's preceptor. The preceptor does not have to be the supervising individual as long as the preceptor provides, directs, or verifies training and experience required. If more than one preceptor is necessary to document experience, obtain a separate preceptor statement from each.

First Section
Check one of the following:

☑ **1. Board Certification**

☑ I attest that **Rance Hardison** has satisfactorily completed the requirements in
Name of Proposed Radiation Safety Officer

10 CFR 35.50(a)(1)(i) and (a)(1)(ii); or 35.50 (a)(2)(i) and (a)(2)(ii); or 35.50(c)(1).

OR

☐ **2. Structured Educational Program for Proposed Radiation Safety Officers**

☐ I attest that _____ has satisfactorily completed a structural educational
Name of Proposed Radiation Safety Officer

program consisting of both 200 hours of classroom and laboratory training and one year of full-time radiation safety experience as required by 10 CFR 35.50(b)(1).

OR

RADIATION SAFETY OFFICER TRAINING AND EXPERIENCE AND PRECEPTOR ATTESTATION (continued)

Preceptor Attestation (continued)

First Section (continued)
Check one of the following:

☐ **3. Additional Authorization as Radiation Safety Officer**

☐ I attest that _____ is an
Name of Proposed Radiation Safety Officer

☐ Authorized User ☐ Authorized Nuclear Pharmacist

☐ Authorized Medical Physicist

identified on the Licensees license and has experience with the radiation safety aspects of similar type of use of byproduct material for which the individual has Radiation Safety Officer responsibilities

---

AND

Second Section
Complete for all *(check all that apply)*:

☐ I attest that _____ has training in the radiation safety, regulatory issues, and
Name of ProposedRadiation Safety Officer

emergency procedures for the following types of use:

☐ 35.100

☐ 35.200

☐ 35.300 oral administration of less than or equal to 33 millicuries of sodium iodide I-131, for which a written directive is required

☐ 35.300 oral administration of greater than 33 millicuries of sodium iodide I-131

☐ 35.300 parenteral administration of any beta-emitter, or a photon-emitting radionuclide with a photon energy less than 150 keV for which a written directive is required

☐ 35.300 parenteral administration of any other radionuclide for which a written directive is required

☐ 35.400

☐ 35.500

☐ 35.600 remote afterloader units

☐ 35.600 teletherapy units

☐ 35.600 gamma stereotactic radiosurgery units

☐ 35.1000 emerging technologies, including:

_____

_____

NRC FORM 313A (RSO)
(2-2007)

U.S. NUCLEAR REGULATORY COMMISSION

RADIATION SAFETY OFFICER TRAINING AND EXPERIENCE AND PRECEPTOR ATTESTATION (continued)

AND

Third Section
Complete for ALL

|✓| I attest that **Rance Hardison** has achieved a level of radiation safety knowledge
Name of Proposed Radiation Safety Officer

sufficient to function independently as a Radiation Safety Officer for a medical use licensee.

Fourth Section
Complete the following for Preceptor Attestation and signature

I am the Radiation Safety Officer for **NOAA Center for Coastal Fisheries and Habitat Research**
Name of Facility

License/Permit Number: **32-00426-02**

Name of Preceptor	Signature	Telephone Number	Date
David Johnson, Ph.D. Center Dir.		**(252) 728-8746**	**07/03/2008**

July 3, 2008

To: Rance Hardison
From: Center Director, Center for Coastal Fisheries and Habitat Research (CCFHR)

Subj: Letter of Interim Appointment

Enclosure 1: Radiation Safety Officer Certificate of Training
Enclosure 2: Training Requirements for Interim Radiation Safety Officer per 10 CFR 35.50(a)(1)(i) and (a)(1)(ii)

I hereby appoint you as the Interim Radiation Safety Officer for the CCFHR Radiation Safety Program as it is being decommissioned.

Your Interim Appointment expires when the Nuclear Regulatory Commission (NRC) has officially decommissioned the CCFHR Radiation Safety Program.

Based on your education, training, and experience I deem you qualified to perform the duties and responsibilities of this appointment in accordance with enclosures 1 and 2 above.

Your point of contact is the CCFHR Safety Officer.

Effective July 3, 2008.

David Johnson Center Director CCFHR

July 3, 2008

Certificate of Training

Awarded To

Rance Hardison

Recognizing completion of 40 hours of specialized instruction in

Radiation Safety Officer

August 29, 2003

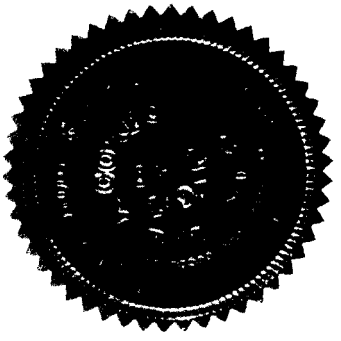
Presented By

Radiation Safety Academy
481 North Frederick Avenue, Suite 302
Gaithersburg, Maryland 20877

AAHP has awarded this course 32 Continuing Education Credits, 2003-00-018
ABIH has awarded this course 4.5 CM Points, CM Approval # 03-021

Ray Johnson

Raymond Johnson, CHP, PE, RSO
Training Director



Certificate of Training

This Certifies That

Rance Hardison

has been trained, tested and successfully completed the specialized instruction in

DOT & NRC Requirements for Shipping and Receiving Radioactive Materials

August 28, 2003

Presented By: **Sean M. Austin, Instructor**
Radiation Safety Academy
481 North Frederick Avenue, Suite 302, Gaithersburg, Maryland 20877
www.RadiationSafetyAcademy.com -- 301-990-6006

Presented For: **National Ocean Service/NOAA**

Presented At: **Gaithersburg, MD**

This certifies that the employee named on this certificate has been trained and tested in accordance with the training requirements of 49 CFR, Subpart H.

Rance Hardison
Employer's Signature

This certificate is valid for 24 months for ICAO/IATA and for three years for U.S. Department of Transportation and U.S. Nuclear Regulatory Commission or Agreement State Agencies.

Sean Austin, CHP
Senior Health Physicist

RADIATION SAFETY OFFICER

August 25-29, 2003

Instructors: Alan Fellman, PhD, CHP; Sean Austin, CHP

This course is intended to provide a minimum of 40 hours of required and elective classes to meet provisions of 10 CFR 33.15. Required classes are already checked.
Please select elective classes for a total of 40 or more hours.

Day 1	Monday	August 25, 2003	
Class Selected	**Start Time**	**Class Titles (electives in *bold, italics*)**	**Class Hours**
☑	8:00	Radiation Fundamentals	4.0
	12:00	Lunch (provided)	
☑	1:00	Radiation Fundamentals (continued)	3.0
☑	4:00	Health Effects	2.0
☐	***6:00***	***Radiation Risk Assessment***	***1.5***
	7:30	Adjourn	

Day 2	Tuesday	August 26, 2003	
Class Selected	**Start Time**	**Class Titles (electives in *bold, italics*)**	**Class Hours**
☑	8:00	Radiation Protection Standards, 10 CFR Part 19 and 20	2.0
☑	10:00	Essential Highlights of 10 CFR Part 2, 30, 31, 33	2.0
	12:00	Lunch (provided)	
☑	1:00	License Applications and Amendments	1.0
☑	2:00	External Dosimetry and Shielding	1.0
☑	3:00	Internal Dosimetry Sealed Sources	1.5
☑	4:30	Legal Implications: Radiation Litigation	1.5
☐	***6:00***	***Math Review & Radiation Safety Problem Solving***	***1.5***
	7:30	Adjourn	

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(800) 871-7930

Day 3 Wednesday August 27, 2003

Class Selected	Start Time	Class Titles (electives in *bold, italics*)	Class Hours
☑	8:00	Radiation Survey Instruments, Laboratory Instruments	4.0
	12:00	Lunch (provided)	
☑	12:30	Instruments Lab, Applications & Troubleshooting, Leak Tests	3.0
☐	***3:30***	***Radiation Safety Surveys***	***2.0***
☐	***5:30***	***Sealed Source & Industrial Gauges***	***1.5***
☐	***5:30***	***X-Ray Safety***	***1.5***
	7:00	Adjourn	

Thank you for the training

Day 4 Thursday August 28, 2003

Class Selected	Start Time	Class Titles (electives in *bold, italics*)	Class Hours
☑	8:00	Interpreting Radiation Measurements and Quality Assurance	2.0
☑	10:00	Shipping and Receiving Radioactive Materials, DOT Training Requirements	2.0
	12:00	Lunch (provided)	
☑	1:00	Transportation (continued), Transportation Exam	3.0
☐	***4:00***	***Radioactive Waste Management, Mixed Wastes, Waste Manifests***	***2.0***
☐	***6:00***	***Course Review and Preparation for Final Exam, Refreshments***	***1.5***
	7:30	Adjourn	

Day 5 Friday August 29, 2003

Class Selected	Start Time	Class Titles (electives in *bold, italics*)	Class Hours
☑	8:00	Radiation Safety Program Management	1.0
☑	9:00	Preparing for Regulatory Inspections, Emergency Response, Information Resources, Challenges for RSO's	2.0
☑	11:00	Final Exam (passing grade of 70% correct is required)	1.0
	12:00	Presentation of Certificates and Adjourn	

end of manuals

AAHP has awarded this course 32 Continuing Education Credits, 2003-00-018
ABIH has awarded this course 4.5 CM Points, CM Approval # 03-021

§ 35.50 Training for Radiation Safety Officer.

Except as provided in § 35.57, the licensee shall require an individual fulfilling the responsibilities of the Radia Officer as provided in § 35.24 to be an individual who--

(a) Is certified by a specialty board whose certification process has been recognized by the Commission or an State and who meets the requirements in paragraphs (d) and (e) of this section. (The names of board certific have been recognized by the Commission or an Agreement State will be posted on the NRC's Web page.) To h certification process recognized, a specialty board shall require all candidates for certification to:

(1)(i) Hold a bachelor's or graduate degree from an accredited college or university in physical science or eng biological science with a minimum of 20 college credits in physical science;

(ii) Have 5 or more years of professional experience in health physics (graduate training may be substituted f than 2 years of the required experience) including at least 3 years in applied health physics; and

(iii) Pass an examination administered by diplomates of the specialty board, which evaluates knowledge and c radiation physics and instrumentation, radiation protection, mathematics pertaining to the use and measurem radioactivity, radiation biology, and radiation dosimetry; or

(2)(i) Hold a master's or doctor's degree in physics, medical physics, other physical science, engineering, or a mathematics from an accredited college or university;

(ii) Have 2 years of full-time practical training and/or supervised experience in medical physics—

(A) Under the supervision of a medical physicist who is certified in medical physics by a specialty board recog Commission or an Agreement State; or

(B) In clinical nuclear medicine facilities providing diagnostic and/or therapeutic services under the direction c who meet the requirements for authorized users in §§ 35.290 or 35.390;

(iii) Pass an examination, administered by diplomates of the specialty board, that assesses knowledge and co clinical diagnostic radiological or nuclear medicine physics and in radiation safety; or

(b)(1) Has completed a structured educational program consisting of both:

(i) 200 hours of classroom and laboratory training in the following areas--

(A) Radiation physics and instrumentation;

(B) Radiation protection;

(C) Mathematics pertaining to the use and measurement of radioactivity;

(D) Radiation biology; and

(E) Radiation dosimetry; and

(ii) One year of full-time radiation safety experience under the supervision of the individual identified as the R Safety Officer on a Commission or Agreement State license or permit issued by a Commission master materia authorizes similar type(s) of use(s) of byproduct material involving the following--

(A) Shipping, receiving, and performing related radiation surveys;

(B) Using and performing checks for proper operation of instruments used to determine the activity of dosage meters, and instruments used to measure radionuclides;

(C) Securing and controlling byproduct material;

(D) Using administrative controls to avoid mistakes in the administration of byproduct material;

(E) Using procedures to prevent or minimize radioactive contamination and using proper decontamination pro

(F) Using emergency procedures to control byproduct material; and

(G) Disposing of byproduct material; or

(2) [Reserved]

(c)(1) Is a medical physicist who has been certified by a specialty board whose certification process has been the Commission or an Agreement State under § 35.51(a) and has experience in radiation safety for similar ty byproduct material for which the licensee is seeking the approval of the individual as Radiation Safety Officer meets the requirements in paragraphs (d) and (e) of this section; or

(2) Is an authorized user, authorized medical physicist, or authorized nuclear pharmacist identified on the lice and has experience with the radiation safety aspects of similar types of use of byproduct material for which tl has Radiation Safety Officer responsibilities; and,

(d) Has obtained written attestation, signed by a preceptor Radiation Safety Officer, that the individual has sa completed the requirements in paragraph (e) and in paragraphs (a)(1)(i) and (a)(1)(ii) or (a)(2)(i) and (a)(2) or (c)(1) or (c)(2) of this section, and has achieved a level of radiation safety knowledge sufficient to function independently as a Radiation Safety Officer for a medical use licensee; and

(e) Has training in the radiation safety, regulatory issues, and emergency procedures for the types of use for licensee seeks approval. This training requirement may be satisfied by completing training that is supervised Safety Officer, authorized medical physicist, authorized nuclear pharmacist, or authorized user, as appropriat authorized for the type(s) of use for which the licensee is seeking approval.

[70 FR 16361, Mar. 30, 2005; 71 FR 1926, Jan. 12, 2006; 71 FR 15008, Mar. 27, 2006]

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Tuesday, May 27, 2008