

# CIMARRON CORPORATION

P.O. BOX 315 • CRESCENT, OK 73028

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January 27, 2010

Mr. Kenneth Kalman  
Office of Nuclear Materials Safety & Safeguards  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Re: Docket No. 70-925; License No. SNM-928

Dear Mr. Kalman:

This letter is to inform you of the designation of Mr. Harry Newman as Radiation Safety Officer (RSO) for License SNM-928. The previous RSO, Mr. Rick Callahan, served in his position through December 31, 2009. Mr. Newman assumed the RSO position on an interim basis, effective January 1, 2010, until he was approved by the Cimarron ALARA Committee on January 27, 2010.

Section 17.2.3.1 of NUREG-1757, Consolidated NMSS Decommissioning Guidance, provides guidance for designation and acceptance of a RSO. The ALARA Committee for Cimarron used this guidance in selecting Mr. Newman for the RSO position and concluded that Mr. Newman is qualified to serve as RSO.

Documentation of the ALARA Committee evaluation of Mr. Newman's qualifications is provided in Attachment 1 and will be maintained for inspection by the NRC. Mr. Newman's resume is provided in Attachment 2.

If you have any questions regarding this license amendment request, please call me at 405-775-5194 (OKC) or 405-642-5152 (mobile).

Sincerely,



Jeff Lux  
Senior Project Manager

Cc: Jack Whitten, NRC Region IV  
David Cates, DEQ  
Mike Broderick, DEQ

## ATTACHMENT 1

Evaluation of Mr. Harry Newman's  
Qualifications as Radiation Safety Officer  
For the Cimarron Decommissioning Site  
As Per NUREG-1757, Section 17.2.3.1

NUREG-1757, Consolidated NMSS Decommissioning Guidance, provides guidance to NRC personnel involved in licensing actions related to site decommissioning. Although this guidance document was generated primarily for staff use, it is used by NRC as guidance for licensees, to assist them in the preparation of decommissioning plans and license amendments. Consequently, this document provides guidance for nearly any licensing action.

Mr. Rick Callahan, who is designated as the RSO for the Cimarron site, left to take a position with another company on December 31, 2009. Mr. Harry Newman was selected as a candidate for the RSO position and assumed an interim role until a formal, documented review of his qualifications could be performed by the ALARA Committee.

The ALARA Committee evaluation of Mr. Newman's qualifications will be performed in accordance with Section 17.2.3.1 of NUREG-1757, which states, in part:

*The RSO is adequately qualified if he/she meets the following criteria:*

- *Education: A Bachelors' degree in the physical sciences, industrial hygiene or engineering from an accredited college or university or an equivalent combination of training and relevant experience in radiological protection. Two years of relevant experience are generally considered equivalent to 1 year of academic study*
- *Health physics experience: At least 1 year of work experience in applied health physics, industrial hygiene or similar work relevant to radiological hazards associated with site remediation. This experience should involve actually working with radiation detection and measurement equipment, not simply administrative or "desk" work; and*
- *Specialized knowledge: A thorough knowledge of the proper application and use of all health physics equipment used for the radionuclides present at the site, the chemical and analytical procedures used for radiological sampling and monitoring, and methodologies used to calculate personnel exposure to the radionuclides present at the site.*

Mr. Newman holds a Master of Science degree in Environmental Engineering (Health Physics), as well as a Bachelors' degree in Nuclear Engineering. Mr. Newman also holds comprehensive certification by the American Board of Health Physics since 1992, with re-certifications in 1996, 2000, 2004, and 2008. Mr. Newman has held a range of positions in the health physics field since 1980, and has over 30 years experience. His experience includes a broad range of both field and management positions. Mr. Newman has provided consulting expertise at the Cimarron site since 1994. He is uniquely knowledgeable of site conditions and maintains all of the specialized knowledge required for the RSO position.

Section 17.2.3.1 of NUREG-1757 also states:

*The description of the RSO's duties and responsibilities should include the responsibility and authority to:*

- *Review and approve all procedures involving the use of radioactive material at the facility*

- Review and approve all procedures involving the use of radioactive material at the facility
- Review and approve individuals as radiation workers at the site;
- Conduct audits and inspections to ensure that activities involving the use of radioactive material are being conducted safely;
- ~~Monitor materials use and storage areas at the site;~~
- Oversee the inventory, ordering, receipt and shipment of all radioactive material and radioactive waste at the site;
- Ensure that all personnel at the site are trained in site radiation safety procedures and practices;
- Ensure that sealed sources are leak-tested per NRC requirements;
- Respond to and investigate incidents and accidents involving radioactive material at the site:
- Monitor and evaluate radiation worker exposures at the site, and;
- Maintain all required records.

*The RSO should have the authority and access to all areas involved in decommissioning or radioactive material usage at the site and the specific authority and responsibility to stop any operations that in the RSO's opinion are not being conducted safely.*

At the Cimarron site, the RSO is responsible for all the responsibilities listed above, although the RSO is allowed to delegate specific responsibilities based on the experience and capability of his/her personnel. The RSO, as well as all health physics personnel utilized onsite, have access to all areas involved in decommissioning or radioactive material usage, and have the authority to stop operations not being conducted safely. These above responsibilities are listed in procedure CI-RP-01 at the Cimarron site.

This evaluation demonstrates that Mr. Newman meets all of the requirements for RSO for the Cimarron decommissioning project as specified in Section 17.2.3.1 of NUREG-1757. Therefore, Mr. Newman is approved by Licensee management and Cimarron corporate management as RSO for the Cimarron site.

  
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 Mike Logan  
 Vice President, Cimarron Corporation

1/27/10  
 Date

  
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 Jeff Lux  
 Project Manager, Tronox Worldwide LLC

1/27/10  
 Date

## ATTACHMENT 2

### HARRY J. NEWMAN, CHP

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#### SUMMARY OF EXPERIENCE

Mr. Newman currently holds the position of Vice President with Lucas Newman Science & Technologies, Inc. (LNST). Mr. Newman is a Certified Health Physicist with over 30 years of experience in the nuclear industry and in regulatory programs. His experience includes Regulatory Compliance, Decontamination and Decommissioning, Low-Level Radioactive Waste Management, Hazardous Waste Management, Mixed Waste Management, NORM Waste Management, Waste Processing/Minimization, Quality Assurance, Auditing, Environmental Monitoring, Nuclear Facility Licensing, Technical Support, Facility Operations, Emergency Management and Response, Site Characterization and Assessment, Dose Assessment, Laboratory Management, Instrument Calibration, and Project Management. Mr. Newman is familiar with all phases of facility compliance, including NRC, State, OSHA, EPA, and DOT regulations, and has considerable experience with computer models used for modeling and demonstration of regulatory compliance (MCNP, RESRAD, COMPLY, Microshield, CAP88PC, RADON, VARSKIN, D and D, HOTSPOT, etc.).

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#### PROFESSIONAL EXPERIENCE

- Vice President for LNST, Inc., a small business based in Stillwater, OK with additional offices in Prospect, KY. In this capacity, Mr. Newman assists in the management of the business and performs health physics consulting services for clients.
- Technical Director for Nextep Environmental, Inc. (Nextep). In this capacity, Mr. Newman served as the focal point for all technical work produced by the company, ensuring technical quality and correctness in calculations. Mr. Newman directed Nextep technical staff in the production of technical documentation necessary to support all aspects of decommissioning, operations, health and safety, or regulatory compliance.
- Corporate Radiation Safety Officer / Health and Safety Officer for Nextep. Mr. Newman oversaw all aspects of operations dealing with safety and regulatory compliance, including compliance with federal, state and local radiological and occupational safety regulations, as well as compliance with all licenses and permits.
- Health Physics Laboratory Quality Assurance Manager. In this capacity, Mr. Newman ensured that laboratory operations were performed in accordance with the Kerr-McGee Quality Assurance Plan (QAP) and Health Physics Laboratory Quality Assurance Project Plan (QAPP) through the performance of audits and surveillances.
- Project Director for the Mallinckrodt C-T Phase I Project, St. Louis, Missouri. Successfully demolished, decontaminated, decommissioned, and performed all aspects of Final Status Survey for the Mallinckrodt Columbiu-m-Tantalum facilities contaminated with uranium and thorium and daughters. The \$5MM project involved the management of operations, health physics, subcontractor (demolition and waste loadout/transportation), as well as final status survey project personnel.
- Technical Manager for the Cimarron Corporation facility located in Oklahoma. The facility was operated from 1966 to 1975 for the manufacture of enriched uranium and mixed-oxide reactor fuels for U.S. government and industry use. Responsible for the preparation of license submittals to the U.S. NRC for Special Nuclear Materials use. The license submittals included the preparation of a comprehensive Radiation Protection Plan to address all phases

of facility decommissioning, including regulatory compliance, health physics, personnel and environmental monitoring, surveys, unconditional release of materials, etc. Also prepared U.S. NRC Byproduct license submittals for instrument calibration sources. Managed the preparation and submittal of numerous decommissioning plans, characterization plans and reports, final status survey plans and reports, groundwater characterization studies and monitoring plans, and environmental monitoring reports. Responsible for cost savings through the development and implementation of novel cost-saving methods for addressing contamination in soils and concrete media. Performed extensive radiological pathways modeling using modeling software and innovative health physics techniques incorporating ICRP 30 and ICRP 67 methodologies.

- Technical Manager involved with the Cushing facility located in Oklahoma. This facility was operated from 1963 to 1966 for the processing of uranium and thorium for use as fuels and other products. Prepared and managed regulatory compliance audits for the Kerr-McGee Corporate Safety & Environmental Affairs Division to verify compliance with applicable regulations.
- Provided technical services and MARSSIM compliance assistance related to the Kerr-McGee West Chicago Facility located in Illinois. This facility was operated for the processing of thorium source material. Performed radiological modeling using MARSSIM techniques and developed plans for the estimation and minimization of waste volumes.
- Project Manager for investigations involving naturally occurring radioactive materials (NORM) at numerous scrap metal recycling and industrial facilities.
- Responsible for the preparation of comprehensive license submittals for Scientific Ecology Group's Oak Ridge waste processing facilities. Facilities and activities addressed in the license included volume reduction, sorting, metals processing/recycling, physical and chemical decontamination processes, waste incineration, resin processing, soil washing, mixed-waste processing, waste shipment, radiological controls, and regulatory compliance.
- Project Manager for Scientific Ecology Group, Inc., in Oak Ridge, Tennessee. Responsible for the preparation of a license submittal to the State of Washington for a comprehensive radioactive/mixed waste treatment and volume reduction facility. The preparation of this license application required design of facilities, estimation of types and quantities of materials, development of risk estimates, and included numerous interactions with State of Washington regulatory personnel and recognition of all applicable rules and regulations.
- Project Manager responsible for the implementation of revised 10 CFR 20 regulations for Scientific Ecology Group, Inc., in Oak Ridge, Tennessee. This project involved the preparation of a comprehensive Radiation Protection Plan and hundreds of procedures. In addition, Mr. Newman managed the development and implementation of a Radiological Access Management System (RAMS) database and software. This automated database, linking two SEG Oak Ridge facilities, was developed within a strict timeframe of 6 months and was fully implemented prior to the January 1, 1994 deadline for 10 CFR 20. It is used for access control, tracking of doses and training requirements, bioassays, radiation work permits, respiratory protection requirements, internal dose assignments, NRC form 4 and 5 generation, ALARA program management, dosimetry, and equipment issue.
- Assisted with the licensing of a Low-Level Radioactive Waste Disposal Facility US Ecology, Inc., near Ward Valley, California. Responsible for coordinating the preparation and submittal of the pre-operational Environmental Report detailing the current environmental status of the Ward Valley site. Presented environmental monitoring results to State of California regulatory personnel, and developed a comprehensive environmental monitoring program for the facility. Prepared the license submittal for the proposed site, and addressed regulatory interrogatories.

- Responsible for the assembly of a 10 CFR 61 license renewal application for the US Ecology, Inc., Richland, Washington Low-Level Radioactive Waste Disposal Facility. This project included numerous regulatory interface meetings and preparation and submission of all required licensing documents.
- Responsible for the radiological specifications and design of a radon barrier cap for a US Ecology, Inc., facility in Richland, Washington to receive 11(e)2 mill tailings. Design of the radon barrier involved the use of the RADON computer code as specified by US NRC Regulatory Guide 3.64.
- Deputy Corporate and Acting Corporate Radiological Control and Safety Officer responsible for corporate oversight and regulatory compliance over US Ecology low level radioactive waste disposal facilities located in Richland, Washington and Beatty, Nevada, as well as low-level radioactive waste brokerage operations located in Pleasanton, California. Also responsible for compliance with settlement agreement requirements for monitoring and maintenance at the closed Sheffield, Illinois waste disposal facility.
- Nuclear/Environmental Engineer with the North Carolina Division of Radiation Safety in Raleigh, North Carolina. Responsible for managing the review and analysis of the statewide database compiled from environmental sampling performed at nuclear facilities and in environs throughout North Carolina. Responsibilities also included the use of sophisticated computer equipment and software models utilized for the integration of laboratory equipment to allow for automated data acquisition and report generation. Mr. Newman also designed comprehensive environmental sampling programs for nuclear facilities and conducted numerous seminars and meetings to provide radiation protection education to the public.
- Health Physicist with the Department of Environmental Health and Safety at the University of Florida in Gainesville, Florida. Provided health physics services to the University's research programs and Shands Hospital, developed and revised standard operating procedures for users of radioactive materials, and was responsible for personnel monitoring. Performed audits of the Crystal River Nuclear Power Plant environmental monitoring program, provided instruction to graduate students in health physics courses, and was responsible for the management of radioactive waste generated during research and hospital medical procedures.

#### **EDUCATION AND CERTIFICATION**

MS, Environmental Engineering (Health Physics), University of North Carolina-Chapel Hill, 1993.

BS, Nuclear Engineering, University of Florida, 1983.

Certified Health Physicist (CHP), Comprehensive certification by the American Board of Health Physics (ABHP), 1992, recertified 1996, 2000, 2004, and 2008.