

Murnahan, Colleen

From: Torres, RobertoJ
Sent: Thursday, August 05, 2010 8:14 AM
To: Murnahan, Colleen
Subject: Amendment request
Attachments: RSO Training Amendment Request.pdf; RSO Course Summary - VIXR.pdf

Colleen:

Please set this action as an amendment for license 04-29076-02 (030-38291). Please include in the action the two attachments. Thank you.

Roberto

From: Scott Cargill [mailto:scott@vxray.com]
Sent: Wednesday, August 04, 2010 4:59 PM
To: Torres, RobertoJ
Subject: RE: RSO course Valley Ind. Xray

Thanks, and yes, please find attached an amendment request for the previously mentioned program. At this time I wish to add in house training only.

Should we move to provide vendor training we will seek an amendment at that time for it.

Scott Cargill

*Quality Assurance Manager - RSO
ASNT / ACCP / PED Level III
API 510 / 570 AWS CWI*

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F: (661) 393-8497
M: (661) 979-1682
E: scott@vxray.com
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**Valley Industrial X-Ray
& Inspection Services Inc.
6201 Knudsen Drive
Bakersfield, CA 93308**

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From: Torres, RobertoJ [mailto:RobertoJ.Torres@nrc.gov]
Sent: Wednesday, August 04, 2010 1:28 PM
To: Scott Cargill
Subject: RE: RSO course Valley Ind. Xray

Scott:

I will look at the information when I return to the office. However I want to clarify the following:

1. Are you requesting an amendment to Valley's license for approval of in-house training? If so, I need a signed/dated letter from you making such request. I will get a copy of the entire training program from the link that you have provided and will add it to your request letter. This will be considered the complete amendment request.
2. When the time comes to provide training to outside entities, you will need to submit an amendment requesting authorization to provide training with live sources as a service provider (vendor training). You cannot provide vendor training with live sources until authorized by the NRC (if no live sources are involved then you don't need to amend the license nor request authorization from the NRC). The amendment request to provide vendor training with live sources will involve an increase in annual fees because of the addition of another licensed activities (service provider). You can contact Brenda Brown (brenda.brown@nrc.gov) and inquire about the fee increase.

Roberto J. Torres

From: Scott Cargill [mailto:scott@vxray.com]
Sent: Wednesday, August 04, 2010 11:59 AM
To: Torres, RobertoJ
Subject: RSO course Valley Ind. Xray

Roberto,

Thanks for taking the time to help guide me on this. Please find attached what I've pulled together to represent an Industrial Radiographer Radiation Safety Officer Course including maintenance and retrieval.

My goals are to provide an industry accepted and approved course for the industrial radiographer moving into an ARSO or RSO position. I do not believe that courses offered adequately address the industrial side well enough, it is my hopes that this course will fill that need.

This course is designed to be offered by a qualified instructor and administered to individuals who have at the minimum sat for an approved 40 hour rad safety course, and preferably someone who has already attained 4,000 hours as an industrial radiographer.

I'm seeking the NRCs approval of this program to be offered and accepted as a qualified formal course per 10CFR Part 34(a)(3).

At this time this course will be considered In-House training though in the future we may wish to offer it to outside sources.

It is my intent that the in-house training may use live sources, all outside sources would use dummy sources.

Any suggestions on the content are welcomed.

Please note, the PDF of the entire program is just over 12 megs, as your email system will reject any file over 10 megs I have placed a copy on our webserver that you can access at www.vxray.com/rso_course.pdf

Thanks for all your help.

Scott Cargill

Quality Assurance Manager - RSO

ASNT / ACCP / PED Level III

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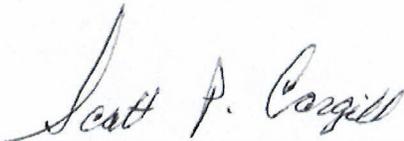
Attn: Roberto J. Torres
Senior Health Physicist
U.S. Nuclear Regulatory Commission - Region IV
Division of Nuclear Materials Safety
Nuclear Materials Safety Branch B
612 East Lamar Boulevard, Suite 400
Arlington, Texas 76011-4125

Re: Amendment Request
License 04-29076-02

August 4th, 2010

Valley Industrial X-Ray and Inspection Services, Inc. License 04-29076-02 wishes to expand our training curriculum to include a Radiation Safety Officer program and requests an amendment to our license to include approval of our Radiation Safety Officer / Alternate Radiation Safety Officer training course.

This course will be administered in house only and may utilize live sources during training.



Scott Cargill – RSO
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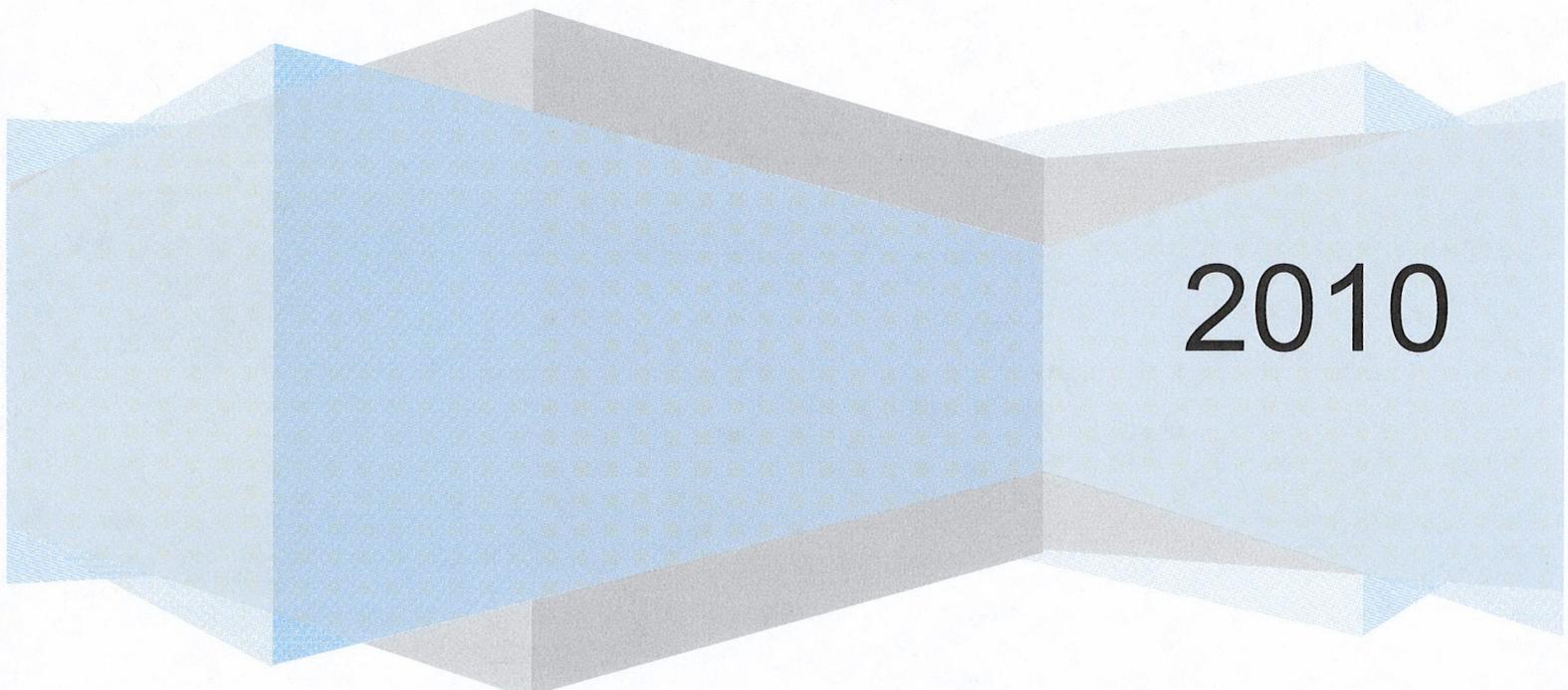
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Radiation Safety Officer / Alternate Radiation Safety
Officer Training.

Radiation Safety Officer Training

Corporate RSO / RSO / Alternate RSO



2010



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CRSO / RSO / ARSO Training Module

Scope: The Radiation Safety Officer / Alternate Radiation Safety Officer training module was prepared to educate experienced radiographers who have met the requirements of USNRC 34.43(a) and shall fulfill the requirements of USNRC 34.42(a)(3).

Subjects to be covered;

The establishment and maintenance of a radiation protection program

The role of the RSO

- 8 Hr Regulations USNRC 10 CFR Parts 19, 20, 21, 34, 71, Applicable Agreement State and License conditions (Applicable to mean agreement state if applicable and relevant to the students needs, this may a comparison of programs represented by a diverse groups needs)
- 1 Hr Program Oversight and Audits to include assigning action levels and responses, audit points, frequency and goals
- 1 Hr Operating Procedures to include a review of the students operating procedures if available in lieu of a generic procedure.
- 1 Hr Emergency Procedures to include a review of the students operating procedures if available in lieu of a generic procedure.
- 1 Hr Licensing and Amending of Licenses
- 2 Hr Receiving, shipping and transporting Materials to include a review of 10 CFR Part 71, and 49 CFR Part 172
- 1 Hr Inventory and control including Increased Controls to include regulatory requirements and IC Orders
- 1 Hr Training of personnel to include hazmat training requirements per 49 CFR
- 1 Hr Documentation and record keeping



Dosimetry use, calibration, limitations and documentation

1 Hr Direct and indirect reading dosimeters

½ Hr Rate alarms

1 Hr Survey Meters

Exposure devices

2 Hr Related equipment Use, Inspections, and Maintenance, Collimators, guide tubes, drive assemblies, to include hands on training with available equipment.

4 Hr Gamma Projectors Use, Inspections and Maintenance to include hands on training with available devices.

Leak Testing

½ Hr Regulatory Requirements

1 Hr Performance to include discussion of MDA requirements

8 Hr Retrieval Operations, theory and practical applications to include hands on training with inert sources.

It is the goal of this course to address the full scope of a RSOs duties, responsibilities and regulatory requirements, where time and materials permit, the students programs and makes / models of equipment will be incorporated into this course, where impractical generic procedures and available equipment shall be utilized.

Retrieval operations shall utilize either the QSA Global 880D or Industrial Nuclear IR100 model exposure devices, using dummy I.E. non-radioactive source pig tails.

This course shall be approximately 40 hours in length, some of which but not all, may be conducted via computer based training.



CRSO / RSO / ARSO Training Module

This program is presented to educate and prepare an experienced radiographer for the duties of a radiation safety officer / alternate radiation safety officer.

Note, this program is designed to be presented by a qualified instructor and will be most effective if the student will actively use the following techniques;

- 1) Listen attentively
 - a. Be respectful of other students needs
- 2) Ask questions to clarify and expand a subject matter
 - a. Remember if you don't clearly understand a point or detail likely someone else will benefit from you asking your question as well.
- 3) Take notes
 - a. Extra white space has been provided on the right hand side of this book for your notes.
- 4) Relate material being presented to daily operations
 - a. It is always helpful to tie the material presented to everyday operations.

Final examination will be in written multiple choices accounting for 60% of the final score the remaining 40% shall be based on hands on exercises, each of which will require an 80% pass score.



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8-19-2010

DATE

This is to acknowledge the receipt of your letter/application dated 8-05-2010, and to inform you that the initial processing, which includes an administrative review, has been performed.

There were no administrative omissions. Your application will be assigned to a technical reviewer. Please note that the technical review may identify other omissions or require additional information.

Please provide to this office within 30 days of your receipt of this card:

The action you requested is normally processed within 90 days.

A copy of your action has been forwarded to our License Fee & Accounts Receivable Branch, who will contact you separately if there is a fee issue involved.

Your action has been assigned **Mail Control Number** 573046.
When calling to inquire about this action, please refer to this mail control number.
You may call me at 817-860-8103.

Sincerely,

Colleen Murnahan

Licensing Assistant

BETWEEN:

Accounts Receivable/Payable
and
Regional Licensing Branches

[FOR ARPB USE]
INFORMATION FROM LTS

Program Code: 03320
Status Code: Pending Amendment
Fee Category: 2B 3L 30
Exp. Date:
Fee Comments:
Decom Fin Assur Req: N

License Fee Worksheet - License Fee Transmittal

A. REGION

1. APPLICATION ATTACHED

Applicant/Licensee: VALLEY INDUSTRIAL X-RAY AND INSPECTION SERVICES, INC.
Received Date: 08/05/2010
Docket Number: 3038291
Mail Control Number: 573046
License Number: 04-29076-02
Action Type: Amendment

2. FEE ATTACHED

Amount: _____

Check No.: _____

3. COMMENTS

Signed: Colleen Murrah

Date: 8-19-2010

B. LICENSE FEE MANAGEMENT BRANCH (Check when milestone 03 is entered / /)

1. Fee Category and Amount: _____

2. Correct Fee Paid. Application may be processed for:

Amendment: _____

Renewal: _____

License: _____

3. OTHER _____

Signed: _____

Date: _____