

Hammond, Michelle

From: Hammond, Michelle
Sent: Tuesday, August 09, 2011 9:20 AM
To: 'Boyd.Wesley@epa.gov'
Subject: Re: REQUEST FOR ADDITIONAL INFORMATION

License No.: 27-05861-02
Docket No.: 030-06981
Control No.: 575529

Dear Mr. Boyd:

This is in reference to your amendment request dated June 6, 2011 requesting to change the RSO. In order to continue our review, we need the following additional information:

- 1) Please Refer to NU-REG 1556 Vol. 11 (link below), specifically Section 8.7.3 Radiation Safety Officer "Response from Applicant" (page 8-21).
<http://www.nrc.gov/reading-rm/doc-collections/nuregs/staff/sr1556/v11/sr1556v11.pdf>
- 2) Please submit a ***Radiation Safety Officer Delegation of Authority*** signed by a member of your executive management ***including a statement delineating the RSO's duties and responsibilities***, please ***use example in Appendix J from Vol.11 link above*** (this could be signed by upper management for your location in Las Vegas, Nevada).

Also, please note in your amendment request, you stated that the proposed RSO meets the requirements of 10 CFR 35.50, this regulation only applies to medical authorizations. The training and experience you submitted for the proposed RSO was acceptable providing the criteria in NU-REG 1556 Vol.11.

We will continue our review upon receipt of this information. Please reply to my attention and refer to Mail Control No. 575529. If you reply via email, please attach the requested documentation in PDF format or you may fax your response to (817) 860-8188.

Please respond to my request by August 17, 2011.

If you have any technical questions regarding this deficiency letter, please call me at (817) 860-8127.

Best Regards,

*Michelle M. Hammond, MSc
Health Physicist
U.S. Nuclear Regulatory Commission, R-IV
Division of Nuclear Materials Safety, Branch A
office) 817-860-8127
fax) 817-860-8188
Michelle.Hammond@nrc.gov*



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
RADIATION AND INDOOR ENVIRONMENTS NATIONAL LABORATORY
P.O. BOX 98517 • LAS VEGAS, NEVADA 89193-8517

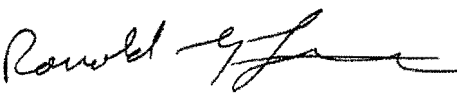
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August 11, 2011

OFFICE OF
AIR AND RADIATION

MEMORANDUM

SUBJECT: Delegation of Authority for Radiation Safety Officer

FROM: Ronald G. Fraass 
Laboratory Director

TO: Employees of R&IE
Employees of Office of Research and Development (ORD)

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Lyndsey Kelly has been appointed Radiation Safety Officer and is responsible for ensuring the safe use of byproduct material. The Radiation Safety Officer is responsible for managing the radiation safety program; identifying radiation safety problems; initiating, recommending, or providing corrective actions; verifying implementation of corrective actions; and ensuring compliance with regulations for the use of byproduct material. The Radiation Safety Officer is hereby delegated the authority necessary to meet these responsibilities.

The Radiation Safety Officer is accountable for the implementation and enforcement of the radiation safety program. Temporary minor exceptions to specific provisions of the Radiation Safety Manual may be granted by the RSO on an individual basis, providing such exceptions do not jeopardize individual safety or violate the NRC license, conditions, and associated documents, and rules and regulation for the use of radioactive materials or equipment that produces ionizing radiation.

The duties of the RSO, as stated in the Radiation Safety Manual, are as followed:

The RSO shall advise the Director, RSC, and workers of radiation safety hazards and on the control of radioactive materials and other sources of ionizing radiation. The RSO serves as the custodian for all radioactive sources and has in possession a current inventory of all radioactive materials from their receipt to their ultimate disposal or transfer. All proposed uses of radioactive materials and Standard Operating Procedures (SOPs) for operations involving radioactive materials, when applicable, must be reviewed by the RSO prior to their review by the RSC. The RSO shall administer and conduct training and educational programs for radiation safety and the usage of radiation sources. RSO must ensure the performance that radiological surveys, leak testing of sealed sources and checks of safety equipment are performed on the required schedules. Any procurement requests for radiological materials must be approved by the RSO prior to their purchase. This includes all transfers (in/out bound), disposals and shipments of radioactive materials and waste. In the occurrence of radiological incidents, accidents, or

other deviations from approved radiation safety procedures, the RSO shall implement the corrective actions as necessary. The RSO must review on a quarterly basis all occupational radiation exposure data of personnel, promptly perform an investigation when the established exposure investigational levels are exceeded to determine the cause, and if required, and initiate corrective action to prevent recurrence. At a minimum, the RSO must brief management once each year on the radiation safety program. The RSO must maintain a copy of the NRC license and associated documents, each licensing request and amendment, the written policy and procedures (Radiation Safety Manual), all records and reports required by NRC regulations, and Title 10, Code of Federal Regulations.

The Radiation Safety Officer has the authority to immediately stop any operations involving the use of byproduct material in which health and safety may be compromised or may result in non-compliance with NRC requirements.

Cc: Lyndsey Kelly