

8/15/2011



Licensee Name: Shaw Environmental & Infrastructure, Inc.
License No.: 20-31340-01
Docket No.: 030-37850
Mail Control No.: 575393

P-3
MS-14

Kathy Modes, Senior Health Physicist
Decommissioning Branch
USNRC - Region I - DNMS

Dear Kathy Modes,

In response to your inquiry dated July 11, 2011 I have provided the following responses (**bold**) on behalf of Shaw Environmental & Infrastructure, Inc. (Shaw). Please do not hesitate to call me if you require any additional information.

Regards,

Mark O. Somerville, Ph.D., CHP, REA
Director
Environment, Safety, Health & Quality
Shaw Environmental & Infrastructure, Federal
[REDACTED] Cell
mark.somerville@shawgrp.com

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NRC Questions and Shaw Responses

- a. Describe the control over the radiation safety program that will be delegated so that you will be able to exercise authority over authorized users when confronted with radiation safety problems that require implementation of corrective actions. Provide a written delegation of authority to the RSO signed by senior management. This statement should include provisions for the RSO to carry out his/her authority over each site's program without redirection or hindrance by site management. Include in the statement the RSO's authority to terminate unsafe practices and activities jeopardizing the safety or workers, the public, or environment.

See attached "Delegation of RSO Authority".

- b. Describe the relationship that will exist between you and your institutional management regarding expenditure of funds to facilitate the objectives of your radiation safety program and related regulatory requirements.

See attached "Delegation of RSO Authority".

- c. Identify other commitments you may have in regards to other NRC or Agreement State licensed facilities, along with a description of how you will allocate time to permit the performance of the duties of the RSO as described in the regulations. State your minimum amount of on-site time (hours per week).

I am also the license RSO for Shaw's California service provider license. Each project that invokes either the NRC or CA license has a full time project RSO assigned and is supported by a project CHP. The project RSOs are required to report on compliance and performance issues. My primary responsibility is to ensure that all work conducted under these licenses is safe and compliant.

- d. Appoint an in-house Massachusetts representative who will serve as the point of contact during the RSO's absence. This person may be allowed to assist you with limited authority.

Claire Doherty is the assigned representative who serves as the point of contact during the RSO's absence her contact information is;

Claire Doherty
Radiological Center of Expertise - Radiological Support
Federal AS&E
Shaw Environmental & Infrastructure Group
100 Technology Center Drive
Stoughton, MA 02072
617.589.6750 direct
[REDACTED] cell
617.589.1792 fax
claire.doherty@shawgrp.com

- e. Describe your overall availability to respond to questions or operational issues that arise during the conduct of your radiation safety program and related regulatory requirements. Specify the maximum amount of time it will take you to arrive at the facility in the event of an emergency that requires your presence.

I am available 24/7 by telephone, blackberry and email. Generally, I can be at a project site within 24 hours. I receive weekly status reports and have biweekly calls with all project RSOs.

- f. Please confirm that all required radiation safety records will be maintained at the Massachusetts address for inspection purposes.

Yes license records are maintained at Shaw Office in Stoughton, MA at 100 Technology Center Drive.

- g. Please state the minimum frequency of site visits by the RSO (you) for the purpose of monitoring (e.g. facility/site surveys and review of reports and records for each site) and feedback to site personnel, as well as support staff, to ensure that daily operations at each site include radiation safety activities, approved procedures, safe practices, and compliance with regulations and licensing conditions.

In addition to the items discussed in item h below I visit each site at least annually to conduct a program audit and meet with radiological staff. Based on the complexity of the project I may visit as frequently as I determine is needed to ensure safety and compliance.

- h. Describe the mechanisms for alerting the RSO (you) and responding to unsafe practices and urgent situations that may occur at any site. Please describe the mechanisms for reporting to and informing management of unsafe practices and incidents, and the management role in responding to such circumstances.

Project RSO are responsible for notifying the License RSO immediately of any unsafe practice or urgent situations that may arise onsite. Project RSO's document radiological issues by generating Radiological Occurrence reports which are reviewed by the project management and the license RSO and are tracked through corrective actions to ensure issues are addressed and resolved in a timely manner.

8/12/2011

Attachment

Delegation of RSO Authority

Memo To: Radiation Safety Officer Mark O. Somerville, Ph.D., CHP, REA

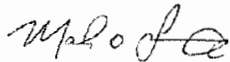
From: Chief Operating Officer, Shaw Environmental & Infrastructure, Inc. Jeffery S. Jenkins

Subject: Delegation of Authority

You, Mark O. Somerville, have been appointed Radiation Safety Officer and are responsible for ensuring the safe use of radiation. You are responsible for managing the radiation protection program; identifying radiation protection problems; initiating, recommending, or providing corrective actions; verifying implementation of corrective actions; stopping unsafe activities; and ensuring compliance with regulations and conditions of the radioactive materials license. You are hereby delegated the authority necessary to meet those responsibilities, including prohibiting the use of radioactive material by personnel who do not meet the necessary requirements, and terminating operations were justified by radiation safety. You are required to notify management if staff do not cooperate and do not address radiation safety issues. In addition, you are free to raise issues with the US Nuclear Regulatory Commission or Agreement State at any time.

Management will ensure funds to facilitate the objectives of your radiation safety program and related regulatory requirements are available.

I accept the above responsibilities,

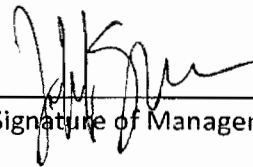


Signature of Radiation Safety Officer

Mark O. Somerville
Radiation Safety Officer Printed Name

Director
Job Title of Radiation Safety Officer

August 15, 2011
Date



Signature of Management Representative

Jeffery S. Jenkins
Management Representative Printed Name

Chief Operating Officer, Shaw
Job Title of Management Representative

August 15, 2011
Date