

From: Bohn, Bob (DDNN) [Bob.Bohn@smithsdetection.com]
Sent: Friday, November 18, 2011 3:31 PM
To: Ullrich, Elizabeth
Cc: Prior, EJ (DEWN); Bohn, Bob (DDNN)
Subject: RE: amendment request letter dated October 14, 2011

Dear Ms. Ullrich:

Thank you for your email. We are taking steps to address each of the issues you raised in your message including naming an RSO with the experience the NRC requires as well as providing the information you requested relating to dosimetry policy. Due to the upcoming Thanksgiving holiday and travel commitments of key personnel during the first week in December if it is acceptable to you our plan is to provide you with a full written response by the week of December 12. In the interim if you have any questions please do not hesitate to contact me or our Compliance Counsel E.J. Prior who I have copied on this message.

Sincerely,

Bob Bohn
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From: Ullrich, Elizabeth [<mailto:Elizabeth.Ullrich@nrc.gov>]
Sent: Tuesday, November 15, 2011 11:30 AM
To: Bohn, Bob (DDNN)
Subject: amendment request letter dated October 14, 2011

License No. 06-31431-01
Docket No. 030-38416
Control No. 576239

Mr. Bohn,

1. The proposed radiation safety officer, Brenda Coats, does not appear to have any experience in using radioactive materials, or in the activities that will be performed with radioactive materials under your license. In addition, although she has attended a Radiation safety Officer training program, she has no experience in performing the duties of a radiation safety officer, including the RSO activities to be performed under your license. Please provide additional information about Brenda Coats experience as described below, or propose a different person for this position:

- a. Provide a description of the Ms. Coats experience in the use of licensed materials; identify the specific isotopes handled, the maximum quantities of materials handled, where the experience was gained, the duration of experience, and the type of use.
 - b. Provide a description of Ms. Coats experience in performing the duties of a radiation safety officer, such as the duties described in your Radiation Safety Manual (responding to incidents or events or site contamination; waste disposal; review of leak test results; auditing of activities such as routine surveys, taking of leak tests, routine physical inventory of radioactive sources, instrument calibration etc to ensure that such activities are performed safely and in accordance with accepted practices; ensuring that activities such as leak testing, inventory, calibration, surveys etc are performed at required intervals; and other such responsibilities.
2. You requested to revise the policy for dosimetry, however, you provided no documentation to demonstrate that it is unlikely that persons will not exceed 10% of the annual dose limits. Based on a review of the information in the Sealed Source and Device Registration for the sources you are authorized to possess, doses of 4 to 9 millirem per hour could result from use of the californium-252 sources (gamma and neutron doses) at 5 centimeters from the source, and 0.1-0.3 millirem per hour at 30 centimeters. Without any information describing how you use the sources, the frequency of use, and the duration of use, we cannot approve this request at this time. In order to change the requirement to issue dosimetry to determine dose from your activities (including a commitment to issue neutron dosimeters to persons handling the californium-252 sources), you need to provide a basis for your determination that persons working with these radioactive materials do not require such monitoring. Area monitoring results may not be sufficient if persons are in closer proximity to the sources than the area monitors.

Please note that, at this time, you appear to be in noncompliance with your license commitments in that dosimetry was not issued as you stated would be done. This issue will be reviewed during an upcoming inspection of your license.

Please respond to this request for additional information with a signed hard copy letter; it may be faxed to us if you need this expedited. If you have any questions, contact me as shown below.

Betsy Ullrich
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