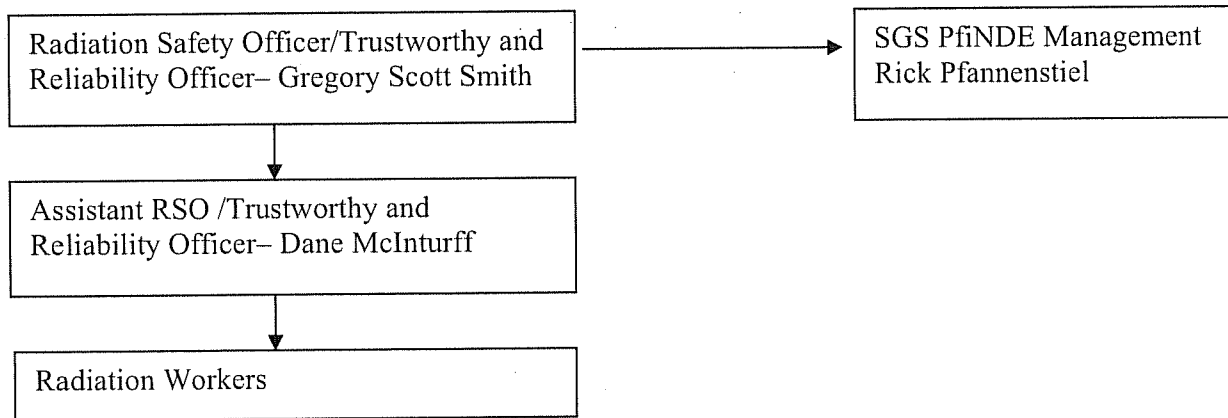




SGS North America Inc., Industrial Division  
Radiation Protection Program

1. The organizational structure of the radiation safety program is as follows:

The flow chart showing RSO at the top reporting to Management on right. The Trustworthy and reliability officer will be assumed by the RSO. The Site RSO reports to the RSO and all technicians report to that person.



*Excerpt from SGS North America Radiation Protect Program describing day-to-day oversight of the radiation safety activities*

RADIATION SAFETY OFFICER RESPONSIBILITIES

- I. The Radiation Safety Officer (RSO) shall be responsible for the education of employees whose activities are such that familiarity with the ALARA program would be necessary. This shall be accomplished through educational sessions, which will include all authorized workers and ancillary personnel who may be subject to radiation exposure. These sessions will consist of instructions in the ALARA philosophy, the Company's ALARA Program and assurance that the management of SGS is committed to the ALARA concept.
- II. The RSO shall be responsible for the development of ALARA procedures in developing these procedures, the RSO will provide the radiation workers the opportunity to participate in the formulation of ALARA procedures. The RSO will maintain close contact with radiation workers in order to develop meaningful ALARA procedures.
- III. The RSO shall instruct all personnel in the procedure for submitting suggestions for improving radiation safety. This procedure shall consist of the employee submitting his suggestions, in writing, to the RSO. At that time the RSO shall evaluate the suggestion (within 5 days) and schedule an appointment with the employee to discuss the suggestions. Should a disagreement arise concerning the disposition of any suggestion, the Managing Director of Operations of the company will make the final determination.
- IV. The RSO shall investigate all known instances of deviation from good ALARA practices, and if possible, determine the causes. IF the cause(s) is known, the RSO will take the appropriate corrective action. The established Investigational exposure levels shall be
 

Monthly ==300 millirem	Quarterly==600 millirem
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- V. The RSO shall ensure that each employee is instructed in the resources available should the employee feel that ALARA is not being promoted in the work place.



2. Audits of technicians and processes will be performed and recorded biannually by the Radiation Safety Officer. Annually the Safety Officer will meet with and present a report to management on findings of the audits. At this time recommendations for changes in the processes will be made to management. The Safety Officer will have immediate access to upper level management any time there is a concern or reportable incident. Technician audits will be performed at a minimum twice a year, will be unannounced and will be documented. Any safety infractions will be documented and depending on severity the technician will be dismissed or retrained.
3. The Operating and Emergency Manual will contain all emergency procedures related to accidents, theft, receiving materials, maintaining security, shipment materials, and travel to job sites.
4. Annually the Radiation Safety Officer will perform an audit of the safety program and present the report to management. This meeting will be documented.
5. The Operating and Emergency Manual will contain forms and procedures addressing receipt, accountability, and inventory procedure and records.
6. The Operating and Emergency Manual will contain forms and procedures addressing surveys, leak tests, and transportation.
7. The Operating and Emergency Manual will contain forms and procedures addressing equipment maintenance. There will be scheduled maintenance on the projector, cranks, and guide tubes. The O&E manual also requires radiographers notify the Safety Officer if any unusual condition exists with this equipment. Equipment is not to be used in unsafe condition.
8. The Operating and Emergency Manual will contain forms and procedures addressing Transportation to job-site, and shipping requirements.

## Simmons, Michelle

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**From:** Simmons, Michelle  
**Sent:** Friday, April 06, 2012 2:51 PM  
**To:** 'gregory.smith@sgs.com'  
**Subject:** SGS North America, Inc. Deficiency Letter Mail Control 576947

License No.: 35-29433-01  
Docket No: 03038486  
Control No: 576947

This is in reference to your letter dated February 9, 2012, requesting to name Gregory Smith as Radiation Safety Officer on your Nuclear Regulatory Commission License No. 35-29433-01. In order to continue our review, we need the following additional information:

1. Please submit a copy of your organizational chart by position, demonstrating day-to-day oversight of the radiation safety activities.

**Please respond to this email by April 13, 2012.** If you are unable to respond by this due date, please don't hesitate to contact me so we can discuss an extension to the date. Our fax number is (817) 200-1263. You may also email your response as a pdf attachment. If you have any questions regarding this email, please call me at 817-200-1590. When responding to this email, please include the license, docket and control numbers located at the top of this page.

Thanking you in advance for your cooperation, assistance, and prompt response in this matter