

## Casey, Colleen

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**From:** Piechocki, Dale R [Dale.R.Piechocki@ul.com]  
**Sent:** Wednesday, June 06, 2012 9:13 AM  
**To:** Casey, Colleen  
**Cc:** Li, Yongtao  
**Subject:** License# 13-32402-01 Amendment Request  
**Attachments:** RadAmendmentApp\_20120606090451.pdf

Hi Colleen,

Attached is the Delegation of Authority, signed and dated along with a letter and training record. The renewal application will be sent within a week.

Thank you,

Dale Piechocki  
Quality Assurance Officer  
UL LLC  
South Bend, Indiana  
[dale.r.piechocki@ul.com](mailto:dale.r.piechocki@ul.com)  
Phone: (574) 472-5523  
Fax: (574) 233-8207

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**From:** Casey, Colleen [<mailto:Colleen.Casey@nrc.gov>]  
**Sent:** Tuesday, June 05, 2012 11:19 AM  
**To:** Piechocki, Dale R  
**Subject:** RE: One more thing....

Hi Dale,

When you submit the amendment request adding you as RSO, simply include the Delegation of authority, signed and dated, along with the business letter transmitting it that your management will also sign. A PDF copy sent by email should be fine so long as it is signed. Thanks very much.

Colleen

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**From:** Piechocki, Dale R [<mailto:Dale.R.Piechocki@ul.com>]  
**Sent:** Tuesday, June 05, 2012 7:56 AM  
**To:** Casey, Colleen  
**Subject:** RE: One more thing....

Hi Colleen,

I downloaded the Delegation of Authority sample. After review I will have it signed. Do you need the original signed sent in the mail or will an electronic copy sent by email be acceptable?

Dale Piechocki  
Quality Assurance Officer  
UL LLC  
South Bend, Indiana  
[dale.r.piechocki@ul.com](mailto:dale.r.piechocki@ul.com)  
Phone: (574) 472-5523  
Fax: (574) 233-8207

**From:** Casey, Colleen [mailto:Colleen.Casey@nrc.gov]  
**Sent:** Monday, June 04, 2012 5:59 PM  
**To:** Piechocki, Dale R  
**Cc:** Forster, Sara  
**Subject:** One more thing....

Dear Dale,

I remembered something after we got off the phone. Since you are becoming the proposed RSO, in your amendment request please include a statement that says you understand the duties and responsibilities of the RSO position and that you accept the position.

Also, please include a "Delegation of Authority," which is a brief statement signed and dated by both you and senior UL management. A sample can be found in a different copy of our NUREG guidance documents at this link, [Appendix I](#):

<http://www.nrc.gov/reading-rm/doc-collections/nuregs/staff/sr1556/v9/r2/sr1556v9r2-final-appendices-i-w.pdf>

If you have questions, please let us know. Thanks very much.

*Colleen*

**Colleen Carol Casey**  
**Health Physicist/Materials Licensing Reviewer**  
**Division of Nuclear Materials Safety**  
**United States Nuclear Regulatory Commission**  
**Region III**  
**2443 Warrenville Road**  
**Suite 210**  
**Lisle, IL 60532-4352**  
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June 6, 2012

Materials Licensing Branch  
U.S. Nuclear Regulatory Commission, Region III  
2443 Warrenville Road, Suite 210  
Lisle, IL 60532-4352

RE: Amendment Request to Radioactive Material License# 13-32402-01

Dale Piechocki has been appointed as the Radiation Safety Officer, replacing Ray Siery. Dale has completed the ORAU 40-Hour Radiation Safety Officer Training Course in 2009, has been the Assistant RSO and the Quality Assurance Officer since 2009. Dale is familiar with the radioactive material in the radiation laboratory and how the material is used.

If you have any questions, please do not hesitate to contact me directly.

Sincerely,

A handwritten signature in black ink, appearing to read 'Yongtao Li'.

Yongtao Li, Ph.D.  
Lead Technical Director

## Typical Duties and Responsibilities of the Radiation Safety Officer and Sample Delegation of Authority

### Model Radiation Safety Officer Duties and Responsibilities

The duties and responsibilities of the Radiation Safety Officer (RSO) include ensuring radiological safety and compliance with NRC and DOT regulations and the conditions of the license. Model procedures for describing the RSO's duties and responsibilities appear below. Applicants may either adopt these model procedures or develop alternative procedures to meet the requirements of 10 CFR 35.24. As a result of implementation of the EPAct, licensed material now includes accelerator-produced radioactive materials and discrete sources of Ra-226. Licensees authorized under 10 CFR 30.32(j) to produce and noncommercially transfer PET radioactive drugs to consortium members should review the model duties and responsibilities below, expanding on them as necessary to ensure radiation safety oversight of the production and transfer only to medical use consortium members.

Typically, these duties and responsibilities include ensuring the following:

- Unsafe activities involving licensed material are stopped;
- Radiation exposures are ALARA;
- Up-to-date radiation protection procedures in the daily operation of the licensee's byproduct material program are developed, distributed, and implemented;
- Possession, use, and storage of licensed material are consistent with the limitations in the license, the regulations, the SSDR certificate(s), and the manufacturer's recommendations and instructions;
- Individuals installing, relocating, maintaining, adjusting, or repairing devices containing sealed sources are trained and authorized by an NRC or Agreement State license;
- Personnel training is conducted and is commensurate with the individual's duties regarding licensed material;
- Documentation is maintained to demonstrate that individuals are not likely to receive, in 1 year, a radiation dose in excess of 10% of the allowable limits or that personnel monitoring devices are provided;
- When necessary, personnel monitoring devices are used and exchanged at the proper intervals, and records of the results of such monitoring are maintained;
- Licensed material is properly secured;
- Documentation is maintained to demonstrate, by measurement or calculation, that the total effective dose equivalent to the individual likely to receive the highest dose from the licensed operation does not exceed the annual limit for members of the public;
- Proper authorities are notified of incidents such as loss or theft of licensed material, damage to or malfunction of sealed sources, and fire;

APPENDIX I

- Medical events and precursor events are investigated and reported to NRC, cause(s) and appropriate corrective action(s) are identified, and timely corrective action(s) are taken;
- Audits of the Radiation Protection Program are performed at least annually and documented;
- If violations of regulations, license conditions, or program weaknesses are identified, effective corrective actions are developed, implemented, and documented;
- Licensed material is transported, or offered for transport, in accordance with all applicable DOT requirements;
- Licensed material is disposed of properly;
- Appropriate records are maintained; and
- An up-to-date license is maintained, and amendment and renewal requests are submitted in a timely manner.

**Model Delegation of Authority**

Memo To: Radiation Safety Officer

From: Chief Executive Officer

Subject: Delegation of Authority

You, Dale Piechocki, 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. You are hereby delegated the authority necessary to meet those responsibilities, including prohibiting the use of byproduct material by employees who do not meet the necessary requirements and shutting down operations where justified to maintain radiation safety. You are required to notify management if staff does not cooperate and does not address radiation safety issues. In addition, you are free to raise issues with the Nuclear Regulatory Commission at any time. It is estimated that you will spend 2 hours per week conducting radiation protection activities.

  
\_\_\_\_\_  
Signature of Management Representative

6-6-2012  
\_\_\_\_\_  
Date

I accept the above responsibilities,

Dale Piechocki  
\_\_\_\_\_  
Signature of Radiation Safety Officer

6-5-2012  
\_\_\_\_\_  
Date

cc: Affected department heads



OAK RIDGE ASSOCIATED UNIVERSITIES

This is to certify that

*Dale R. Piechocki*

has completed

***40-HOUR RADIATION SAFETY OFFICER TRAINING COURSE***

conducted by Professional Training Programs  
of Oak Ridge Associated Universities

This 26th day of June, 2009  
at Oak Ridge, Tennessee

A handwritten signature in cursive script that reads 'Tonya A. Bernhardt'.

Tonya Bernhardt, Health Physicist, CHP