

From: [Ullrich, Elizabeth](#)
To: "[stephen.v.howard.civ@mail.mil](#)"; "[david.m.walsh.civ@mail.mil](#)"
Cc: [Gaskins, Farrah](#); [Lawyer, Dennis](#)
Subject: FW: additional information/clarification needed for your renewal of LN 01-00126-16
Date: Monday, December 03, 2012 1:09:00 PM

My apologies, error in the email address

From: Ullrich, Elizabeth
Sent: Monday, December 03, 2012 1:06 PM
To: 'Stephen.v.howard.cov@mail.mil'; 'david.m.walsh.cov@mail.mil'
Cc: Gaskins, Farrah; Lawyer, Dennis
Subject: additional information/clarification needed for your renewal of LN 01-00126-16

LN 01-00126-16
DN 030-12630
Control No. 577800

Mr. Walsh and Mr. Howard,

Just a couple of items of additional information or clarification are needed to complete the renewal.

1. Regarding approval of new users as described in your enclosure 3 – confirm that you understand that, if/when the RSO does an interim approval of new users, these users are working under the supervision of that RSO or another local RSO already approved by the RSC. These interim users cannot independently use material, or supervise the use of material, until approved by the RSC.
2. Your response to our August 29 letter, Item 5, did not contain the statement in 5.c, that any revisions will be in accordance with regulatory requirements, will not change the license conditions, and will not decrease the effectiveness of the Radiation Safety Program. This statement will be included in the condition on your license that will allow greater flexibility in your program. No response is required to this item.
3. Your description of the RSO duties stated that the RSO will perform audits at 2-year intervals. This is acceptable, however, this does not relieve you from performing the annual program review required by the regulation in 10 CFR 20.1101 and 20.2102. No response is required to this item.
4. Your response to our August 29 letter, Item 9, did not address the requirements in 10 CFR 36.51(d)(4) or (5). Confirm that you will revise your training program to address these regulatory requirements.
5. In accordance with 10 CFR 36.65, confirm that the irradiator will be operated only in the presence of an irradiator operator and at least one other individual who is trained to respond appropriately to alarms from the irradiator facility;
6. In accordance with 10 CFR 36.53(b)(8) and (9), confirm that you will revise your emergency procedures to include these regulatory requirements.

Please respond with 10 days, in writing, signed by management. You may submit either by hard copy, facsimile or pdf. If you have any questions, please contact Farrah Gaskins at 610-337-5143, Betsy Ullrich at 610-337-5040 or Dennis Lawyer at 610-337-5366.

Thanks,

Betsy

Betsy Ullrich, MS, CHP

Senior Health Physicist, RI

US NRC

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