

From: [Thompson, Richard](#)
To: [FCSS Document Processing Resource](#)
Cc: [Hammelman, James](#)
Subject: FW: Requested Revision to NIST RAI Response Dated November 16, 2012
Date: Tuesday, December 18, 2012 3:28:59 PM
Attachments: [665S NIST RAI response revision 12-18-12.doc](#)

From: O'Brien, Thomas [<mailto:thomas.obrien@nist.gov>]
Sent: Tuesday, December 18, 2012 2:12 PM
To: Thompson, Richard
Cc: Kayser, Richard F.
Subject: Requested Revision to NIST RAI Response Dated November 16, 2012

Richard-

As discussed with you earlier today, I am providing NIST's requested revision to our RAI Response dated November 16, 2012. This is an administrative change and has no impact on the Radiation Safety Program with respect to regulatory compliance or safety and health activities.

In our response to RAI #1 concerning the responsibility of the Ionizing Radiation Safety Committee (IRSC) to review, approve, and record safety evaluations of proposed uses/users of byproduct material, please delete the highlighted text indicated below.

Proposed Uses:

The IRSC procedure for approving proposed uses of licensed material, to be effective upon NRC approval of NIST's license renewal application for license SNM-362, requires the IRSC (or a subcommittee of the IRSC) to review safety evaluations for the proposed use – including the hazard mitigation plan, the qualifications of the user(s), and the adequacy of the facility – to determine whether the criteria for approval (see below) have been met. When the IRSC has determined that the criteria have been met, the IRSC Chair (or Vice Chair if the Chair is absent) documents IRSC approval by signing and dating the appropriate form.

The criteria for IRSC approval of safety evaluations for proposed uses are as follows:

1. Source Custodian and Source User eligibility must have been approved by the IRSC.
2. Source Custodians and Source Users must be authorized as being qualified for the proposed use by their line management **and OU Director (or Acting Director)**.
3. The radiation facility evaluation by GRSD must indicate that the facility is adequate for the specific source use under review.
4. The hazard mitigation plan provided by GRSD must be adequate and consistent with good radiation safety practices for achieving doses that are ALARA.

R/Tom

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