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UNITED STATES
NUCLEAR REGULATORY COMMISSION

REGION III
2443 WARRENVILLE ROAD, SUITE 210
LISLE, ILLINOIS 60532-4352

TELEFAX TRANSMITTAL

DATE May 2, 2013

NUMBER OF PAGES 6

SEND TO Walter J. Lampi, Radiation Safety Officer

LOCATION Empire Iron Mining Partnership - Empire Mine

FAX NUMBER (906) 475-³⁷⁷⁷~~3800~~

☐ VERIFY BY CALLING

FROM: Bill Reichhold
(Sender)

TELEPHONE NUMBER (630) 829-9839

FAX NUMBER (630) 515-1078

If you do not receive the complete fax transmittal, please contact the sender as soon as possible at the telephone number provided above.

MESSAGE See accompanying documents.



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LOCATION Empire Iron Mining Partnership - Empire Mine

FAX NUMBER (906) 475-³⁷⁷⁷~~2502~~

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TELEPHONE NUMBER (630) 829-9839

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MESSAGE See accompanying documents.

NOTICE

This message is intended only for the use of the individual or entity to which it is addressed and may contain information that is privileged, confidential, or exempt from disclosure under applicable law. If the reader of this message is not the intended recipient or the employee responsible for delivering the message to the intended recipient, you are hereby notified that any dissemination, distribution or copying of this communication is strictly prohibited. If you received this communication in error, please notify the sender immediately by telephone and return the original to the above address, by U.S. Mail. Thank You.

The following additional information is needed to review your request to add Jeremy Laakso as the Radiation Safety Officer (RSO) to your license.

The NUREG-1556, Volume 4 requires that an individual wishing to be the RSO is required to successfully complete the training course criteria as described in NUREG-1556, Volume 4, section 8.7.1.

The individual is required to successfully complete the fixed gauge manufacturer's or distributor's course for uses or for RSOs

OR

Successfully complete an equivalent course that meets the Appendix G criteria.

The APPENDIX G, NUREG - 1556, Vol. 4, "Criteria for Acceptable Training for Authorized Users and Radiation Safety Officers" includes a list of items that are to be included in the course content.

1. TRAINING COURSE

After a review of the course content for the 40 hour radiation safety training course provided by Radiation Technology, Inc., it was not clear if the course included the following topics:

Radiation Safety

- Radiation vs. contamination
- Internal vs. external exposure
- ALARA concept
- Location of sealed source within the gauge

Regulatory Requirements

- Storage of radioactive materials
- Material control and accountability
- Annual audit of radiation safety program
- Transfer and disposal
- Prior events involving fixed gauges
- Handling incidents
- Employee protection
- Deliberate misconduct

Practical Explanation of the Theory and Operation for Each Gauge Possessed by the Licensee

- Routine vs. non-Routine maintenance
- Lock-out procedures

Please confirm that the 40 hour radiation safety training course provided by Radiation Technology, Inc. included the topics listed above.

2. ON-THE-JOB TRAINING- SUPERVISED HANDS-ON EXPERIENCE

The proposed Radiation Safety Officer (Jeremy Laakso) needs on-the-job training that must be done under the supervision of an AU (Authorized User) or RSO (Radiation Safety Officer):

Supervised Hands-on Experience Performing need to include the following topics:

- Operating procedures
- Test runs of emergency procedures
- Routine maintenance
- Lock-out procedures

Please confirm that the proposed Radiation Safety Officer (Jeremy Laakso) received the “Supervised Hands-on Experience” as described above and that the “Supervised Hands-on Experience” was done under the supervision of an Authorized User or the Radiation Safety Officer.

3. TRAINING ASSESSMENT

Management must ensure that proposed RSO's (Jeremy Laakso) is qualified to work independently with and is knowledgeable of the radiation safety aspects of all types of gauges that are possessed by the licensee. This may be demonstrated by written or oral examination or by observation.

It is not clear if the proposed RSO (Jeremy Laakso) is qualified to work independently with and is knowledgeable of the radiation safety aspects of all types of gauges that are possessed by Empire Iron Mining Partnership.

Please confirm that Jeremy Laakso is qualified to work independently with and is knowledgeable of the radiation safety aspects of all types of gauges that are possessed by Empire Iron Mining Partnership.

4. COURSE INSTRUCTOR QUALIFICATIONS

It was not clear if the instructor(s) who taught the 40 hour radiation safety training course provided by Radiation Technology, Inc. met the "Instructor Qualifications" as specified in Appendix G.

Please provide evidence that the instructor who taught the 40 hour radiation safety training course by Radiation Technology, Inc., met the "Instructor's Qualifications" as described below.

Course Instructor Qualifications

- Bachelor's degree in a physical or life science or engineering
- Successful completion of a fixed gauge manufacturer's or distributor's course for users (or equivalent)
- Successful completion of an 8 hour radiation safety course; and
- 8 hours hands-on experience with fixed gauges

OR

- Successful completion of a fixed gauge manufacturer's or distributor's course for users (or equivalent)
- Successful completion of 40 hour radiation safety course; and
- 30 hours of hands-on experience with fixed gauges.

OR

The applicant may submit a description of alternative training and experience for the course instructor.

5. RADIATION SAFETY OFFICER AVAILABILITY

Please describe the availability of the Radiation Safety Officer (RSO):

- a. Please describe the amount of time each week the proposed RSO (Jeremy Laakso) will spend at the Tilden mine and the Empire mines performing his duties as RSO.**
- b. Please indicate the amount of time it will take for the proposed RSO (Jeremy Laakso) to respond to an emergency involving radioactive materials when he is not at the Tilden Mine or Empire mine.**
- c. Please describe any previous commitments the proposed RSO (Jeremy Laakso) has as the RSO and/or authorized user at any other NRC licensed facility and describe the impact this will have on his duties as the RSO at the Tilden and Empire mines.**
- d. Since the proposed RSO (Jeremy Laakso) will be the RSO for both the Tilden and Empire mines, please describe any adverse impact this will have on his duties as the RSO. If there will be no adverse impact, please state so, and why.**
- e. Please describe how the proposed RSO (Jeremy Laakso) will divide his time between both the Tilden and Empire mines so that he will be able to adequately perform his duties as the Radiation Safety Officer for both facilities.**

Please send a facsimile (630- 515-1078) of your response to the above within 7 days and state, Response to Control 580423. Please include a cover letter on company letterhead, dated and signed (signed by an individual who is authorized to sign official documents on behalf of the licensee) with your response letter. Please call me at 630-829-9839 if you have any questions.

In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice," a copy of this facsimile and the attached documents will be available electronically for public inspection in the NRC Public Document Room or from the Publicly Available Records (PARS) component of NRC's document system (ADAMS). The NRC's document system is accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html> (the Public Electronic Reading Room).

From the desk of:

A handwritten signature in cursive script, appearing to read "Bill Reichhold".

Bill Reichhold