Phone 800-996-8880 Fax 203-270-3582



July 29, 2013

Laurie Kaufman U.S.N.R.C. Region 1 2100 Renaissance Blvd Suite 100 King of Prussia, PA 19406 L3 06-30610-01/2013001

Re: Recurrent Training for Employee(s)

Dear Laurie:

Per your request, Q/C Resource Technical Services will provide the following statement of intent that all current or future employees have an annual refresher training covering the following areas after their initial Radiation Safety Class for Portable Nuclear Gauge Operators.

(1) On-the-Job Training and Examination (Practical):

On-the-job training done under the supervision of the RSO (Philip Palilla) or qualified individual authorized by the NRC or Agreement State that includes supervised handson experience performing the task authorized on the license that are commensurate with the expected hazards during routine and emergency conditions.

Practical examination consisting of an assessment by the RSO to ensure that each authorized user is qualified to work independently and knowledgeable of the radiation safety aspect of licensed activities. This will be demonstrated by observation of such authorized activities.

- (2) Discussion and / or drill on Q/C Resource Technical Services Emergency Procedures for Portable Gauge License and Service Provider signed and dated by the employee / authorized user.
- (3) Retraining on areas found to be deficient in both the practical and didactic areas.

This documentation will be kept on file for inspection by the NRC.

Philip C. Palilla

Q/C Resource Technical Services

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## Q/C RESOURCE TECHNICAL SERVICES EMERGENCY PROCEDURES FOR PORTABLE GAUGE LICENSE AND SERVICE PROVIDER

If an emergency occurs, such as loss, theft, fire, explosion, or vehicle accident in which the nuclear gauge may be damaged or lost, the operator shall follow these procedures:

- 1. SECURE THE AREA AROUND THE ACCIDENT. KEEP UNAUTHORIZED PERSONS AWAY. ALERT PEOPLE IN VICINITY OF THE PRESENCE OF RADIOACTIVITY AND A POSSIBLE HAZARD.
- 2. DO NOT LEAVE THE SITE. Send a helper or on-looker to notify the following:
  - a. Radiation Safety Officer, Philip C. Palilla whose phone numbers are:

Work: <u>203-426-0200</u> Home: Cell:

b. Local Police: 911 / 203-270-4255

c. Local Fire Department (where applicable): 911/203-270-4383

- 3. The Radiation Safety Officer in turn must immediately notify the U.S.N.R.C. Emergency Response at 301-816-5100 or 800-695-7403 for safety concerns, and other local authorities as indicated. Identify the call as a **RADIATION EMERGENCY** and give the following information:
  - a. Your name
  - b. Agency or firm
  - c. Location of incident
  - d. The telephone number where you can be reached
  - e. If a source rod breaks and you are unable to place inside of gauge, use the lead pig to place the source until it can be transported back to the manufacturer.
  - f. A calibrated survey meter will be available if needed.

Upon contact with the U.S.N.R.C., report the following information:

- a. What happened
- b. Date and time the emergency began
- c. Are there any injured people
- d. Actions taken
- e. Emergency agencies present on scene or notified
- f. Present status
- 4. The operator should inform emergency workers of the radiation hazard possibly existing, and should help them keep the area secure and explain to the emergency personnel of the radioactive device, the extent of the possible hazard. In no case should the operator leave the site until qualified experts arrive, unless, or course, the operator is seriously injured or incapacitated, and must be removed from the site by emergency personnel for necessary medical treatment.
- 5. In the event that the source incapsulation becomes damaged / dislodged from the gauge, the manufacturer will be notified immediately. Q/C Resource Technical Services will not accept such gauges for service, but may assist in recommendations to resolve potential issues.

APPROVED BY:

(Applicant)

DATE

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