



CONVERSATION RECORD

11/26/2013

NAME OF PERSON(S) CONTACTED OR IN CONTACT WITH YOU Jennifer Western, Laboratory Manager and Radiation Safety Officer (RSO)		DATE OF CONTACT 11/25/2013	TYPE OF CONVERSATION <input type="checkbox"/> E-MAIL <input checked="" type="checkbox"/> TELEPHONE <input type="checkbox"/> INCOMING <input checked="" type="checkbox"/> OUTGOING
E-MAIL ADDRESS jwestern@stlouisco.com		TELEPHONE NUMBER (314) 615-6830	

ORGANIZATION St. Louis County Department of Health Environmental Health Laboratories	DOCKET NUMBER(S) 030-05125
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LICENSE NUMBER(S) 24-11263-01	CONTROL NUMBER(S) 581441
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SUBJECT
Additional information needed to complete the review of your renewal application, dated July 23, 2013
Please submit requested information within 10 days of the date of this request.

SUMMARY

We have reviewed your license renewal application and find that we are unable to continue this action until we have received additional information outlined on page 2 of this conversation record.

Direct any questions you have to me at (630) 829-9892 or sara.forster@nrc.gov.

When submitting additional information, please reference Control No. 581441, as listed at the top of this memo. Please FAX your response to my attention at (630) 515-1078. You may also scan your response and send to me via email, as a pdf file. Include a signed and dated cover letter with your response.

As discussed, we expect to receive your written response on or before December 5, 2013.

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ACTION REQUIRED (IF ANY)
We have requested that the licensee provide additional information as follows:

- Submit management-signed and dated NRC Form 313 and MOU/DOA for the RSO.
- Expand description of purpose of use; also confirm that no field studies will be conducted, under this license.
- Provide additional training program details including topics, methods, frequency, and assessment, as applicable
- Facility details as noted below

NAME OF PERSON DOCUMENTING CONVERSATION
Sara A.B. Forster, M.S.

SIGNATURE
Sara A.B. Forster 11/26/2013

CONVERSATION RECORD (continued)

SUMMARY: (Continued from page 1)

J. Western

1. Please submit a signed and dated cover letter incorporating your July 23, 2013 application (with attachments), attached to an NRC Form 313 and a Memorandum of Understanding/Delegation of Authority (MOU/DOA) document, both signed and dated by a member of senior management. When providing additional requested information, outlined below, refer to NUREG 1556, Vol. 7, found at <http://www.nrc.gov/reading-rm/doc-collections/nuregs/staff/sr1556/v7/>. In particular, you may use Appendix C to the volume in preparing your response.
2. Please provide a copy of the current DOA/MOU for your RSO, Jennifer Western. The document should be signed by a senior management official at the organization. Include a description of the RSO's responsibilities with your response and describe the RSO's reporting relationship to the senior management official, if not already addressed in your July 23, 2013, application. The MOU/DOA should also be signed by your Radiation Safety Officer (RSO).
3. Your July 23, 2013, application indicated "purchased as standard reference materials used for instrument calibration and measurement quality control," in your Item 6 response, regarding your purpose of use for radioactive materials. As discussed in our conversation, please explain the authorization you are seeking. (e.g. - for the preparation and use of standards for the instrument calibration and quality control measurements, to be used in the testing of byproduct material levels in drinking water.) In the most recent amendment to your NRC license, the purpose of use includes "analytical samples." Please indicate whether you are requesting an authorization for purchased radioactive materials, or if you are also requesting an authorization for byproduct material in environmental samples.
4. Confirm that no field studies will be conducted under this license, unless specifically requested and authorized.
5. Your July 23, 2013, application generally outlined your radiation safety training program topics to include regulations, responsibilities, procedures, and waste management, but omitted several key topics such as radiation safety (ALARA, biological effects, contamination, etc.), materials ordering procedures, package opening, postings, and survey procedures. Please provide a revised training program description, including topics, as applicable, outlined in NUREG 1556, Vol. 7, Appendix J, pp. J-1 to J-5. If no training in health hazards associated with the use of byproduct material is included in your training topics outline, even for individuals directly involved in the handling of licensed material, please explain your basis for excluding such topics. For ancillary personnel training, please outline the specific topics covered to ensure that appropriate precautions are taken relative to their involvement with licensed material.
6. The July 23, 2013, application indicated that individuals directly involved with radioactive material receive regular refresher training. In our phone conversation, you indicated that an attempt is made to complete training at least annually. The frequency at which ancillary personnel are required to complete training was not addressed. As noted in NUREG 1556, Vol. 7, pp. 8-18 to 8-19, please indicate the method(s) and frequency at which refresher training will be completed, for both individuals directly involved with radioactive material and ancillary personnel.
7. The July 23, 2013, application stated that "[t]he RSO evaluates staff training success by direct observation." As discussed in our phone conversation, and in accordance with NUREG 1556, Vol. 7, pp. 8-18 to 8-19, please indicate indicators that the RSO may apply in determining adequacy of training. For example, if no exam is administered or exam pass criteria applied, as noted in our conversation, what indicators does the RSO look for to determine whether training was adequate?
8. Your July 23, 2013, application included a facility diagram and total square footage for your sole location of use but did not include any room number(s) or dimensions describing the authorized area, as requested in NUREG 1556, Vol. 7, pp. 8-19 to 8-20 and Appendix K, pp. K-1 to K-2. The diagram also omitted information regarding uses above, below, and adjacent to the authorized area of use. Please provide the following additional information, as discussed in our phone conversation: (i) room number(s) associated with the submitted diagram, (ii) dimensions for the pink NRC-licensed area outlined on the submitted diagram, and (iii) confirmation that uses above & below the NRC-licensed area are a roof & storage, respectively.

Forster, Sara

From: Forster, Sara
Sent: Tuesday, November 26, 2013 12:00 PM
To: 'jwestern@stlouisco.com'
Subject: Additional Information Request for St. Louis County Department of Health, NRC Lic. No. 24-11263-01
Attachments: 03620.581441.24-11263-01 telecon signed.pdf

Dear Ms. Western:

See the attached file for additional information needed to complete the review of the renewal application for NRC Lic. No. 24-11263-01. Note that the attached conversation record requests additional information on or before close of business on December 5, 2013. Additional guidance is outlined in NUREG 1556, Vol. 7, "Program Program-Specific Guidance About Academic, Research and Development, and other Licenses of Limited Scope," which may be found at:

<http://www.nrc.gov/reading-rm/doc-collections/nuregs/staff/sr1556/v7/>

Submission of your response as a pdf file attached to an email or via facsimile will allow for the quickest processing. Do not hesitate to call me with any questions you may have.

Sara A. B. Forster, Health Physicist Licensing Reviewer
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