



CONVERSATION RECORD

10/24/2014

NAME OF PERSON(S) CONTACTED OR IN CONTACT WITH YOU Keith A. Goodale, Safety and Environmental Manager and Proposed RSO		DATE OF CONTACT 10/24/2014	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 kgoodale@duro-last.com		TELEPHONE NUMBER (800) 248-0280	

ORGANIZATION Plastatech Engineering, Ltd.	DOCKET NUMBER(S) 030-34117
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LICENSE NUMBER(S) 21-26714-01	CONTROL NUMBER(S) 584681
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SUBJECT  
Our review of your license amendment request letter dated August 18, 2014, which requested to add you as Radiation Safety Officer (RSO) to the above referenced license. As discussed, we expect to receive your written response on or before NOVEMBER 7, 2014.

SUMMARY AND ACTION REQUIRED:

We have reviewed your request, and find that we are unable to continue this action until we have received additional information noted below. Refer to NUREG 1556, Vol. 4, "Program Specific Guidance About Fixed Gauge Licenses," found at <http://www.nrc.gov/reading-rm/doc-collections/nuregs/staff/sr1556/v4>, when providing proposed RSO details noted below. Please provide your response with copies of requested documents and/or on typed 8.5" x 11" sheets, as applicable. For your convenience, copies of the relevant pages from the NUREG 1556 guidance are attached.

PLEASE NOTE THE FOLLOWING WHEN PREPARING YOUR RESPONSE:

- Submit requested information within 14 days of this record, referencing Control No. 584681 as listed at the top of this memo.
- Direct any questions you have to me at (630) 829-9892 or sara.forster@nrc.gov.
- Include a signed and dated cover letter with your response.
- Please FAX your response to my attention at (630) 515-1078, OR scan your response and send to me via email, as a pdf file.

ACTION REQUIRED (IF ANY)

ADDITIONAL INFORMATION NEEDED:

1. Please note the responsibilities and duties the NRC expects of designated RSO. Provide a written memorandum of understanding/ delegation of authority (MOU/DOA) document, signed by both a management representative and you. For your convenience, we have attached a copy of Appendix F to the NUREG 1556 Vol. 4, guidance document, which outlines RSO duties that should be included in such an MOU/DOA document. You may use the model MOU/DOA, taken from the draft NUREG 1556, Vol. 4, rev. 1, Appendix C (attached), revise your August 18, 2014, letter, or create a custom document.
2. Please provide details of your training & experience showing completion of training described in NUREG 1556, Vol. 4, Appendix G (copy attached for your convenience, highlighting RSO course outline with instructor fixed gauge training and experience and training adequacy assessment, as well as supervised on-the-job experience information needed to complete our review).

NAME OF PERSON DOCUMENTING CONVERSATION  
Sara A. Forster, Materials Licensing Branch, Region III Office, 2443 Warrenville Road, Suite 210, Lisle, Illinois 60532

SIGNATURE  
*Sara A. Forster* *10/24/2014*



## Typical Duties and Responsibilities of the Radiation Safety Officer

The RSO's duties and responsibilities include ensuring radiological safety and compliance with both NRC regulations and the conditions of the license. (See Figure 8.2.) Typically, the RSO's duties and responsibilities include ensuring the following:

- Activities involving licensed material that the RSO considers unsafe are stopped
- Radiation exposures are ALARA
- Development, maintenance, distribution, and implementation of up-to-date operating and emergency procedures
- Individuals that use fixed gauges are properly trained
- Possession, installation, relocation, use, storage, routine maintenance and non-routine operations of fixed gauges are consistent with the limitations in the license, the SSD Registration Certificate(s), manufacturer's or distributor's recommendations and instructions
- Safety consequences of non-routine operations are analyzed before conducting any such activities that have not been previously analyzed
- Non-routine operations are performed by the manufacturer, distributor or person specifically authorized by the NRC or an Agreement State
- Prospective evaluations are performed demonstrating that unmonitored individuals are not likely to receive, in one year, a radiation dose in excess of 10% of the allowable limits or personnel monitoring devices are provided
- Personnel monitoring devices, if required, are used and exchanged at the proper intervals, and records of the results of such monitoring are maintained
- Documentation is maintained to demonstrate, by measurement or calculation, that the TEDE to the individual member of the public likely to receive the highest dose from the licensed operation does not exceed the annual limit in 10 CFR 20.1301
- Fixed gauges are properly secured
- Notification of proper authorities of incidents such as damage to or malfunction of fixed gauges, fire, loss, or theft
- Investigation of unusual occurrences involving the fixed gauge (e.g., malfunctions or damage), identification of cause(s), implement of appropriate and timely corrective action(s)
- Radiation safety program audits are performed at intervals not to exceed 12 months and development, implement, and documentation of timely corrective actions
- When the licensee identifies violations of regulations or license conditions or program weaknesses, corrective actions are developed, implemented, and documented
- Licensed material is transported according to all applicable DOT requirements

## APPENDIX F

- Licensed material is disposed of properly
- Appropriate records are maintained
- An up-to-date license is maintained and amendment and renewal requests are submitted in a timely manner
- Posting of documents required by 10 CFR 19.11 (Parts 19 and 20, license documents, operating procedures, NRC Form 3 "Notice to Employees"), and 10 CFR 21.6 (Part 21, Section 206 of Energy Reorganization Act of 1974, procedures adopted pursuant to Part 21) or posting a notice indicating where these documents can be examined

Please provide a signed MOU/DOA document for Mr. Goodale. You may use the model MOU/DOA below, taken from the draft NUREG 1556, Vol. 4, rev. 1, volume (available at the NRC website),

**Model Delegation of Authority to RSO** or revise your letter dated August 18, 2014, to include relevant responsibilities and duties highlighted below.

Memo To: Radiation Safety Officer  
From: Chief Executive Officer  
Subject: Delegation of Authority

You, \_\_\_\_\_, have been appointed radiation safety officer and are responsible for ensuring the safe use of radiation. You are responsible for managing the Radiation Protection Program, identifying radiation protection problems, initiating, recommending, or providing corrective actions, verifying implementation of corrective actions, stopping unsafe activities, and ensuring compliance with regulations. You are hereby delegated the authority necessary to meet those responsibilities, including prohibiting the use of byproduct material by employees who do not meet the necessary requirements and shutting down operations, when justified, to maintain radiation safety. You are required to notify management if staff does not cooperate and does not address radiation safety issues. In addition, you are free to raise issues with the U.S. Nuclear Regulatory Commission at any time. It is estimated that you will spend \_\_\_\_\_ hours per week conducting radiation protection activities.

\_\_\_\_\_  
Signature of Management Representative

\_\_\_\_\_  
Date

I accept the above responsibilities,

\_\_\_\_\_  
Signature of Radiation Safety Officer

\_\_\_\_\_  
Date

**cc: Affected department heads**



## Criteria for Acceptable Training for Authorized Users and Radiation Safety Officers

### Course Content

RSO training documentation should demonstrate completion of a course that meets the following criteria:

**Classroom training** may be in the form of lecture, videotape, or self-study emphasizing practical subjects important to safe use of the gauge: For Mr. Goodale's completion of the Nevada Technical Associates May 2013 40-hour RSO course, please provide a course outline, commensurate with the classroom topics outlined at left.

#### Radiation Safety:

- Radiation vs. contamination
- Internal vs. external exposure
- Biological effects of radiation
- Types and relative hazards of radioactive material possessed
- ALARA concept
- Use of time, distance, and shielding to minimize exposure
- Location of sealed source within the gauge

#### Regulatory Requirements:

- Applicable regulations
- License conditions, amendments, renewals
- Locations of use and storage of radioactive materials
- Material control and accountability
- Annual audit of radiation safety program
- Transfer and disposal
- Recordkeeping
- Prior events involving fixed gauges
- Handling incidents
- Recognizing and ensuring that radiation warning signs are visible and legible
- Licensing and inspection by regulatory agency
- Need for complete and accurate information

## APPENDIX G

- Employee protection
- Deliberate misconduct

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

- Operating and emergency procedures
- Routine vs. non-Routine maintenance
- Lock-out procedures

**On-the-job training** must be done under the supervision of an AU or RSO:

- Supervised Hands-on Experience Performing: Please provide Mr. Goodale's hands-on experience performing activities identified at left. Include the following details with your response:
  - Operating procedures - Date(s) of supervised on-the-job experience
  - Test runs of emergency procedures - Name of supervising AU or RSO
  - Routine maintenance - Location of experience, if other than with Licensee
  - Lock-out procedures

**Training Assessment** Please describe how management has assessed Mr. Goodale's training (i.e. written or oral examination or by observation), sufficient to ensure that he is qualified as noted below.

Management will ensure that proposed AUs are qualified to work independently with each type of gauge with which they may work. Management will ensure that proposed RSO's are qualified to work independently with and are knowledgeable of the radiation safety aspects of all types of gauges to be possessed by the applicant. This may be demonstrated by written or oral examination or by observation.

### **Course Instructor Qualifications**

For Mr. Smith, the instructor at the of the Nevada Technical Associates May 2013 40-hour RSO course, please describe his training and experience with fixed gauges, as highlighted below.

Instructor should have:

- 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



## Forster, Sara

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**From:** Forster, Sara  
**Sent:** Friday, October 24, 2014 11:04 AM  
**To:** 'kgoodale@duro-last.com'  
**Subject:** Additional Information Request for Plastatech Engineering, Ltd., NRC Lic. No. 21-26714-01  
**Attachments:** 03120.584681.21-26714-01 telecon signed.pdf

Dear Mr. Goodale:

Please see the attached file for additional information needed to complete the review of the recent amendment request for NRC Lic. No. 21-26714-01. Note that the attached conversation record requests additional information on or before close of business on November 7, 2014. Additional guidance may be found in, NUREG 1556, Vol. 4, "Program-Specific Guidance About Fixed Gauge Licenses," which may be found at:

<http://www.nrc.gov/reading-rm/doc-collections/nuregs/staff/sr1556/v4>.

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. Forster, Health Physicist Licensing Reviewer**

U.S. Nuclear Regulatory Commission - Region III

Division of Nuclear Materials Safety

2443 Warrenville Rd. - Ste. 210

Lisle, IL 60532-4352

[sara.forster@nrc.gov](mailto:sara.forster@nrc.gov)

Direct: (630) 829-9892

