



# City of Independence

## WATER POLLUTION CONTROL DEPARTMENT

P.O. BOX 1019 • INDEPENDENCE, MISSOURI 64051-0519 • (816) 325-7711 • FAX (816) 325-7722

AN EQUAL OPPORTUNITY EMPLOYER

November 5, 2014

Ms. Sara Forster  
Materials Licensing Section  
U.S. Nuclear Regulatory Commission, Region III  
2443 Warrenville Road, Suite 210  
Lisle, Illinois 60532-4351

Re: Material License No. 24-26236-01 Amendment

Dear Ms. Forster:

Before being chosen to become the new RSO, Karla Pierce, Environmental Compliance Manager, successfully completed training as described in criteria in section 8.7.1 entitled "Radiation Safety Officer" in NUREG-1556, Vol. 4, "Consolidated Guidance about Materials Licenses: Program-Specific Guidance about Fixed Gauge Licenses," dated October 1998. Namely, on September 8, 2014, she viewed a video of an on-site fixed gauge manufacturer's course for users conducted at the time of installation of the gauges in October, 1990. Thomas Kravek, Senior Service Representative for TN Technologies, the gauge manufacturer, was the instructor. The course included detailed instructions on the proper precautions to be taken in utilizing these devices. Specific items of design detail, shutter operation, beam geometry, radiation levels and regulatory compliance were presented by trained personnel of TN Technologies at the time these devices were installed. The training session was videotaped. The course covered the following radiation safety topics:

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

The course also provided a practical explanation of the theory and operation for the gauges installed at the facility, including:

- Operating procedures
- Routine maintenance
- Lock-out procedures

A COMMUNITY IN EASTERN JACKSON COUNTY



## WATER POLLUTION CONTROL

It should be noted that the fixed gauges in use at our facility are mounted 12' in the air and authorized users perform routine maintenance only at an interval of 1/6 months.

The radiation protection program at this facility does not conduct non-routine maintenance. The gauge manufacturer, distributor or other person authorized by NRC or an Agreement State will perform non-routine operations such as installation, initial radiation survey, repair, and maintenance of components related to the radiological safety of the gauges, gauge relocation, replacement, and disposal of sealed sources, alignment, or removal of a gauge from service.

In addition to the fixed gauge manufacturer's course for users, Karla Pierce received instruction from Dorris Bender, existing RSO, on the following topics:

- ALARA concept
- Applicable regulations
- License conditions, amendments, renewals
- Locations of use of radioactive materials (radioactive materials are not stored at the facility)
- Material control and accountability
- Annual audit of radiation safety program
- Transfer and disposal
- Recordkeeping
- Handling incidents
- Recognizing and ensuring that radiation warning signs are visible and legible
- Licensing and inspection by the NRC
- Need for complete and accurate information
- Employee protection (10 CFR 30.7)
- Deliberate misconduct (10 CFR 30.10)
- Operating and emergency procedures

There have been no prior events involving fixed gauges.

Management has assessed Ms. Pierce's training by oral examination.

If you have any questions, please contact us at 816-325-7721.

Sincerely,



Dick Champion, Jr., Director  
Water Pollution Control

DC:db  
Enclosure

# City of Independence

## MEMORANDUM

Water Pollution Control

DATE: October 27, 2014  
TO: Karla Pierce, ECM  
FROM: Dick Champion Jr., Director  
SUBJECT: Delegation of Authority



You, Karla Pierce, 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 justifies, 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 1 hour per week conducting radiation protection activities.

  
\_\_\_\_\_  
Dick Champion, Jr., Director, Water Pollution Control

11/5/14  
\_\_\_\_\_  
Date

I accept the above responsibilities,

  
\_\_\_\_\_  
Karla Pierce, Radiation Safety Officer

11/5/14  
\_\_\_\_\_  
Date

Cc: Robert Patten, Linda Barrier, Jon Irvine

**Forster, Sara**

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**From:** Karla Pierce <kpierce@indepmo.org>  
**Sent:** Thursday, November 06, 2014 9:13 AM  
**To:** Forster, Sara  
**Cc:** Dorris Bender  
**Subject:** RSO designation  
**Attachments:** Karla NRC Info.pdf

Ms. Forster,

Attached, please find the requested documentation regarding my appointment to RSO for the City of Independence. A hard copy of the attached information has been sent as well. If you need more information, don't hesitate to contact me.

Thank you,  
Karla Pierce  
Environmental Compliance Manager  
City of Independence  
816-325-7711

## Forster, Sara

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**From:** Forster, Sara  
**Sent:** Friday, November 21, 2014 4:19 PM  
**To:** Karla Pierce (kpierce@indepmo.org)  
**Subject:** RSO designation - Additional Information Request for City of Independence, NRC Lic. No. 24-26236-01  
**Attachments:** 03120.585037.24-26236-01 telecon2 signed.pdf

Dear Ms. Pierce:

Please see the attached file for information still needed to complete the review of the recent amendment request for NRC Lic. No. 24-26236-01. Note that the attached conversation record includes several options for you to consider and requests additional information on or before close of business on December 5, 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  
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Lisle, IL 60532-4352  
[sara.forster@nrc.gov](mailto:sara.forster@nrc.gov)  
Direct: (630) 829-9892

