



CONVERSATION RECORD

11/21/2014

NAME OF PERSON(S) CONTACTED OR IN CONTACT WITH YOU Karla Pierce, Environmental Compliance Manager and proposed RSO		DATE OF CONTACT 11/21/2014	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 kpierce@indepmo.org		TELEPHONE NUMBER (816) 325-7711	

ORGANIZATION City of Independence	DOCKET NUMBER(S) 030-31871
--------------------------------------	-------------------------------

LICENSE NUMBER(S) 24-26236-01	CONTROL NUMBER(S) 585037
----------------------------------	-----------------------------

SUBJECT
Your 9/30/2014 amendment request letter, our 10/24/2014 conversation record, and your 11/5/2014 letter to add you as the licensee's Radiation Safety Officer (RSO).

SUMMARY AND ACTION REQUIRED:

We have reviewed your request and additional information, and find that we are unable to continue this action until we have received additional details 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 your response. 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. We expect to receive your written response on or before DECEMBER 5, 2014.

PLEASE NOTE THE FOLLOWING WHEN PREPARING YOUR RESPONSE:

- Submit requested information within 14 days of this record, referencing Control No. 585037 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.

ADDITIONAL INFORMATION NEEDED:

To complete our review, and as requested in our October 24, 2014, conversation record, please provide a detailed description of your training & experience showing that you have received practical explanation of the Theory and Operation for each gauge possessed by the licensee - including in operating & emergency procedures, routine vs. non-routine maintenance, and lockout procedures; and completed supervised hands-on on-the-job experience - including operating procedures, test runs of emergency procedures, routine maintenance, and lock-out procedures. Any such description must include specific dates on which training and experience was completed for each of the listed sub-items.

(Continue on Page 2)

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 11/21/2014

CONVERSATION RECORD (continued)

SUMMARY AND ACTION REQUIRED (continued from page 1):

As we discussed, if an individual does not have the training and experience that meets the criteria specified in NUREG 1556, Vol. 4, "Program Specific Guidance About Fixed Gauge Licenses," that individual cannot be specified as Radiation Safety Officer (RSO) on a license authorizing the use of radioactive materials in fixed gauging devices, such as the Thermo Fisher Scientific (formerly Texas Nuclear Corp.) Model 5038 belt weight scale gauges currently authorized under the above-referenced license. If no qualified RSO is appointed for this license, our office may require that the gauges be placed in a possession only status, restricting the use of the gauges, until such time as an appropriate RSO is approved by the NRC.

If you are unable to meet the training and experience criteria specified above, please provide one of the following items to complete our review:

1. To add Karla J. Pierce as RSO, please confirm that:

- Ms. Pierce has read and is familiar with emergency response procedures associated with the gauges authorized under this license. Include the date on which this activity was completed.
- Ms. Pierce has read and is familiar with lockout/tagout procedures required for gauges authorized under this license. Include the date on which this activity was completed.
- Ms. Pierce has read and is familiar with inventory tracking procedures required for gauges authorized under this license. Include the date on which this activity was completed.
- Any required leak tests (including both sample collection and analysis) and shutter tests will be completed by the gauge manufacturer/distributor or other licensee specifically authorized to perform such activities, at intervals specified in the sealed source and device certificate of registration issued by the U.S. Nuclear Regulatory Commission pursuant to 10 CFR 32.210 or the equivalent regulations of an Agreement State. The licensee will not collect or analyze leak test samples; the licensee will not perform required shutter tests.

OR

2. To add an alternative RSO, please submit a Memorandum of Understanding/Delegation of Authority (MOU/DOA) document for that RSO. The request should describe training and experience meeting the criteria in NUREG 1556, Vol. 4, Appendix G.

OR

3. To place your license in temporary possession-only standby status until such time as a qualified RSO may be added to the license, submit a request to place the license in temporary possession-only status, and confirm that all materials listed under the license are secured, in storage only mode. Also indicate the date on which you expect to resume active status.

Forster, Sara

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
2443 Warrenville Rd. - Ste. 210
Lisle, IL 60532-4352
sara.forster@nrc.gov
Direct: (630) 829-9892

