



CONVERSATION RECORD

10/23/2014

NAME OF PERSON(S) CONTACTED OR IN CONTACT WITH YOU Micah J. Brooks, Construction Engineer and Radiation Safety Officer		DATE OF CONTACT 10/23/2014	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 mbrooks@somateng.com		TELEPHONE NUMBER (616) 575-9230	

ORGANIZATION Somat Engineering, Inc.	DOCKET NUMBER(S) 030-29146
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LICENSE NUMBER(S) 21-24685-01	CONTROL NUMBER(S) 584973
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SUBJECT
Our review of your license amendment request letter dated February 28, 2014 (received by email on September 30, 2014) requesting mailing/facilities address, Radiation Safety Officer (RSO), and authorized gauge model changes

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. 1, found at <http://www.nrc.gov/reading-rm/doc-collections/nuregs/staff/sr1556/v1/r1>, when providing additional detail regarding authorized materials and addresses identified in your letter. See note below concerning the RSO item discussed in your letter; no response is needed regarding this item. 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 volumes are attached. Submit requested information within 7 days of this record, as discussed.

PLEASE NOTE THE FOLLOWING WHEN PREPARING YOUR RESPONSE:

- Submit requested information on or before October 30, 2014, referencing Control No. 584973, 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:

1. Regarding the item entitled "Change No. 3," requesting an additional gauge model be listed on your license, please provide the following information, as requested in NUREG 1556, Vol. 1, Appendix B, p. B-1 (copy attached for your reference):
 - Maximum number of Instrotek Model 3500 gauges you would like to have authorized, under the license; and
 - Maximum overall possession limits for each radionuclide listed on the above referenced license.

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 10/23/2014

CONVERSATION RECORD (continued)

M. Brooks

SUMMARY AND ACTION REQUIRED (Continued from page 1):

C/N 584973

2. Regarding the item entitled "Change No. 1," introducing a new Grand Rapids address to be listed on your license, please provide the following information, including any facility closeout information requested in NUREG 1757, Vol. 1, rev. 2:
- Current Mailing Address to be listed in Item 2 on the amendment to your license;
 - Request to add the new Grand Rapids location of use to your license;
 - Description of the new Grand Rapids location of use including confirmation of gauge security pursuant to NRC requirements; and
 - Request to remove the previous Grand Rapids location of use from your license, as applicable, including the following final facility close-out information for the 3390 Broadmoor Avenue location of use:
 - (i) History of radioactive materials use and/or storage at that location. Include all radionuclides and gauge model numbers, and leaking sources, if any.
 - (ii) The most recent leak test results for any sources stored at the 3390 Broadmoor Avenue location, taken prior to transfer and/or disposal of the sources from that facility.
 - (iii) Final disposition information for sealed sources removed from the 3390 Broadmoor Avenue location of use, including date(s) of transfer and/or disposal, the location and licensee the sources were transferred to, and confirmation that removed sources were received.
3. Regarding the item entitled "Change No. 3," describing the addition of Matthew P. Richardson to your Radiation Safety Program, please note that, generally, the NRC limits each licensee to one single RSO. Since your request indicated that your Radiation Safety Program would continue to be under your supervision, we will continue to list you as that RSO. This does not preclude your ability to oversee the program by delegating certain duties to other individuals, while maintaining ultimate responsibility for the program. No response is required for this item.

ITEMS 5 AND 6: MATERIALS TO BE POSSESSED AND PROPOSED USES

Yes	No	Radioisotope	Manufacturer or Distributor Model No.	Quantity	Use As Listed on SSD Certificate	Specify Other Uses Not Listed on SSD Certificate
		Cesium-137	Sealed source manufacturer or distributor and model number: _____ Device manufacturer or distributor and model number: _____	Not to exceed either the maximum activity per source or maximum activity per device as specified in Sealed Source and Device Registration Certificate _____ Ci total	Yes <input type="checkbox"/> Specific description of the gauge use: _____ _____ _____ _____	<input type="checkbox"/> Not applicable <input type="checkbox"/> Uses are: _____ (Submit safety analysis supporting safe use)
		Americium-241	Sealed source manufacturer or distributor and model number: _____ Device manufacturer or distributor and model number: _____	Not to exceed either the maximum activity per source or maximum activity per device as specified in Sealed Source and Device Registration Certificate _____ Ci total	Yes <input type="checkbox"/> Specific description of the gauge use: _____ _____ _____ _____	<input type="checkbox"/> Not applicable <input type="checkbox"/> Uses are: _____ (Submit safety analysis supporting safe use)

List all additional model numbers to be authorized under the license, with this amendment.

Please provide MOU/DOA document(s) appropriate to your organization. You may use the sample, below, taken from taken from the draft NUREG 1556, Vol. 4, rev. 1, volume (available at the NRC

Model Delegation of Authority to RSO

website), or create a custom document specific to your organization.

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

Forster, Sara

From: Forster, Sara
Sent: Thursday, October 23, 2014 8:53 AM
To: 'mbrooks@somateng.com'
Subject: Additional Information Request for Somat Engineering, Inc., NRC Lic. No. 21-24685-01
Attachments: 03121.584973.21-24685-01 telecon signed.pdf; 03121.584973.21-24685-01 NRC 699_2B.pdf

Dear Mr. Brooks:

Please see the attached file for additional information needed to complete the review of the recent amendment request for NRC Lic. No. 21-24685-01. Note that the attached conversation record requests additional information on or before close of business on October 30, 2014. Also, regarding our conversation surrounding RSO responsibilities and authority, I have attached a sample Memorandum of Understanding/Delegation of Authority (MOU/DOA) document you may use in resubmitting your request to add a second RSO to your license. As we discussed, the NRC normally does not list 2 RSOs on a single license. For us to consider the addition of a second RSO, please provide a clear delineation of responsibilities, and submit signed MOU/DOA documents for both the second RSO and yourself.

Additional guidance may be found in, NUREG 1556, Vol. 1, rev. 1, "Program-Specific Guidance About Portable Gauge Licenses," which may be found at:

<http://www.nrc.gov/reading-rm/doc-collections/nuregs/staff/sr1556/v1/r1/>.

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

