

DOCKET: 70-7019

LICENSEE: Oregon State University

SUBJECT: SAFETY EVALUATION REPORT: AMENDMENT 2 - CHANGE IN PERSONNEL AND ADMINISTRATIVE STRUCTURE FOR OREGON STATE UNIVERSITY, SPECIAL NUCLEAR MATERIAL LICENSE NO. SNM-2013 (TECHNICAL ASSIGNMENT CONTROL NUMBER L33358)

BACKGROUND

Oregon State University (OSU) was issued special nuclear material (SNM)-2013 license on August 29, 2011, to possess and use SNM pursuant to the requirements in Title 10 of the *Code of Federal Regulations* (10 CFR), Part 70, "Domestic Licensing of Special Nuclear Material," and other commitments in licensee's application and supplements.

In a letter dated December 29, 2014, OSU submitted a license amendment request to reflect recent changes in radiation safety personnel and administrative structure within the University. Specifically, OSU has appointed a new Radiation Safety Officer (RSO), added a new position of Chief Officer for Risk Management, assigned an interim Vice President for Research, and appointed a new Vice President for Finance and Administration. The submittal was found acceptable for a more detailed review on January 20, 2015.

REGULATORY REQUIREMENTS

The U.S. Nuclear Regulatory Commission (NRC) reviews the applicant's organization and administration to ensure that the proposed management hierarchy and policies provide reasonable assurance that the licensee controls site activities in a manner that ensures the safety of workers, the public, and the environment. To make such determination the staff reviews licensee's key personnel and management qualifications to understand how these will provide reasonable assurance that the health, safety and environmental protection functions and oversight will be effective.

Specifically, 10 CFR 70.23(a)(2) requires the licensee to be qualified by reason of training and experience to use the material for the purpose requested and in accordance with the regulations in 10 CFR Part 70.

DISCUSSION

The staff reviewed OSU's submittal pursuant to requirements of 10 CFR Part 70.23(a)(2) and following the guidance contained in NUREG-1520, Revision 1, "Standard Review Plan for License Applications for Fuel Cycle Facilities." In its submittal OSU provided the curriculum vitae for the recently appointed RSO, Mr. Dan Harlan, and a revised organization chart reflecting the changes to the administrative structure within the University.

Enclosure 1

The University's RSO is appointed by and reports administratively to the Environmental Health and Safety Manager. The RSO is responsible for managing the day-to-day affairs of radiation safety. The RSO will administer the SNM license and is responsible for licensing and regulatory compliance, including liaison with the NRC. Mr. Harlan has over 25 years of experience working in the radiation field within OSU. Prior to Mr. Harlan appointment as RSO, he served for over 15 years as Assistant RSO, in which he was fully involved in the daily responsibilities and oversight for radiation safety at OSU.

Since the work performed under this SNM license report to the RSO, the additional administrative changes within OSU do not represent a significant departure from what is described in the license application and do not pose a reduction in the effectiveness of OSU's implementation of the radiation safety program and its ability to comply with the requirements associated with this license. The organization chart provided in Attachment 2 of OSU license amendment request, dated December 29, 2014, shall replace that of Appendix 5 in OSU license application.

FINDINGS

Based on its review, the staff finds that OSU provided complete documentation, including the curriculum vitae for Mr. Harlan, a description of the key personnel and administrative changes, and a revised OSU organization chart to replace that of Appendix 5 of OSU license application dated February 11, 2010.

As evidenced by Mr. Harlan's extensive experience, education, and training in the radiation field, and at OSU's radiation safety program, staff finds he possesses the qualifications and resources to oversee the safe operation of the facility. In addition, staff verified the additional administrative changes do not reduce the effectiveness of OSU organizational structure described in the license application, and provide for the safe operation of the facility.

Upon review of OSU's December 29, 2014, submittal, the staff finds OSU's organizational changes acceptable.

CONCLUSION

On the basis of the staff's review, as discussed above, OSU has demonstrated that it has an acceptable organization, and sufficient and competent resources that provide reasonable assurance of adequate safety for the activities authorized under SNM-2013. Therefore, the NRC staff concludes that the information provided by OSU meets the applicable requirements in 10 CFR 70.23(a)(2) and is, therefore, approved.