



CONVERSATION RECORD

01/26/2015

NAME OF PERSON(S) CONTACTED OR IN CONTACT WITH YOU Bari P. Chase, current RSO (contacted 1/22/15); Ian K. Richardson, proposed RSO		DATE OF CONTACT 01/23/2015	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 bpchase@sseeng.com; ikrichardson@sseeng.com		TELEPHONE NUMBER (573) 718-4607	

ORGANIZATION Schultz Surveying & Engineering, Inc.	DOCKET NUMBER(S) 030-34973
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LICENSE NUMBER(S) 24-32159-01	CONTROL NUMBER(S) 585566
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SUBJECT
Our review of your license amendment request letters dated December 16, 2014, and January 12, 2015
***NOTE: This Conversation Record replaces the record transmitted to Mr. Chase on January 22, 2015.

SUMMARY AND ACTION REQUIRED:

We have reviewed your current requests to: (1) change the name of the Radiation Safety Officer (RSO) listed on your license to Ian K. Richardson from Bari P. Chase; (2) change your mailing address as stated in the January 12, 2015 letter; and (3) add additional facility addresses, as stated in the December 16, 2014, letter and/or the January 12, 2015, letter. We find that we are unable to continue this action until we have received additional information noted below. Also, please see below regarding (4) our letter transmitting License Amendment No. 08, which noted required closeout information for the 4800 West Blvd. location, if not in use.

Refer to NUREG 1556, Vol. 1, found at <http://www.nrc.gov/reading-rm/doc-collections/nuregs/staff/sr1556/v1/r1>, when providing additional information requested below. For your convenience, copies of the relevant pages from the NUREG 1556 guidance volumes are attached.

PLEASE NOTE THE FOLLOWING WHEN PREPARING YOUR RESPONSE:

- Submit requested information within 14 days of our initial conversation (on or before February 5, 2015)
- Reference Control No. 585566, as listed at the top of this memo.
- Include a signed and dated cover letter with your response.
- Provide your response with copies of requested documents and/or on typed 8.5" x 11" sheets, as applicable.
- Direct any questions you have to me at (630) 829-9892 or sara.forster@nrc.gov.
- 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.

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* 01/26/2015

CONVERSATION RECORD (continued)

B. Chase/I. Richardson

SUMMARY AND ACTION REQUIRED (Continued from page 1):

C/N 585566

ADDITIONAL INFORMATION NEEDED:

1. In your January 12, 2015, letter, you requested to add a new Radiation Safety Officer (RSO), including a copy of the proposed RSO's training certificate confirming completion of a Troxler gauge RSO training course. 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 the proposed RSO - Ian K. Richardson - and a management representative. For your convenience, we have attached a copy of Appendix E to the above cited NUREG 1556 Vol. 1, rev. 1, 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) or create a custom document.
2. In our January 22, 2015, Conversation Record, we requested a Current Mailing Address to be listed in Item 2 on the amendment to your license. However, upon review of the January 12, 2015, we have noted that a new mailing address, located on Highway PP in Poplar Bluff, Missouri, was provided. No additional information is needed to revise the mailing address listed on your license.
3. In our January 22, 2015, Conversation Record, we requested a confirmation and/or description of gauge security at each of the locations of use to be listed on the license. Accordingly, please describe and/or confirm gauge security at each of the Doniphan, Branson, Lake Ozark, and new Poplar Bluff locations of use to be listed on the license, pursuant to NRC requirements
4. Regarding the removal of the 4800 West Boulevard, Poplar Bluff, Missouri, location of use, and the transfer of gauges from that location to either the Branson and/or Lake Ozark, Missouri addresses listed in your December 16, 2014, letter, or to the Doniphan, Missouri address listed in your August 8, 2013, letter, or to another U.S. Nuclear Regulatory Commission or Agreement State License, please explicitly state your request to remove the previous Poplar Bluff location of use from your license, as applicable, including the following final facility close-out information for that 4800 West Boulevard location of use. Refer to NUREG 1757, Vol. 1, rev. 2, when providing additional information requested below:
 - (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 4800 West Boulevard location, taken prior to transfer and/or disposal of the sources from that facility.
 - (iii) Final disposition information for sealed sources removed from the 4800 West Boulevard 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.

The RSO's duties and responsibilities are illustrated in Figure 8.1 and typically include ensuring the following:

- Licensed activities that the RSO considers unsafe are stopped;
- Possession, use, storage, and maintenance of sources and gauges are consistent with the limitations in the license, the Sealed Source and Device Registration sheet(s), and the manufacturer's recommendations and instructions;
- Individuals who use gauges are properly trained;
- When necessary, personnel monitoring devices are used and exchanged at the proper intervals; records of the results of such monitoring are maintained;
- Gauges are properly secured;
- Proper authorities are notified in case of accident, damage to gauges, fire, or theft;
- Unusual occurrences involving the gauge (e.g., accident, damage) are investigated, cause(s) and appropriate corrective action are identified, and corrective action is taken;
- Audits are performed at least annually and documented, and corrective actions are taken;
- Licensed material is transported in accordance with all applicable DOT requirements;
- 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;
- Up-to-date operating and emergency procedures are developed, maintained, distributed, and implemented;
- Non-routine operations are performed by the manufacturer, distributor, or person specifically authorized by NRC or an Agreement State;
- 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;
- When the licensee identifies violations of regulations or license conditions or program weaknesses, corrective actions are developed, implemented, and documented;
- 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 copy of a model MOU/DOA document. You may use the sample, below, taken from the draft NUREG 1556, Vol. 4, rev. 1, volume (available at the NRC website), or create

Model Delegation of Authority to RSO 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: Monday, January 26, 2015 11:09 AM
To: 'bpchase@sseeng.com'; 'ikrichardson@sseeng.com'
Subject: RE: Additional Information Request for Schultz Surveying & Engineering, Inc., NRC Lic. No. 24-32159-01
Attachments: 03121.585566.24-32159-01 telecon signed.pdf

Dear Mr. Chase and Mr. Richardson:

Please see below and the attached file for a revised Conversation Record, based on Mr. Richardson's January 12, 2015, letter, requesting to change the mailing address and the RSO.

Sincerely,
Sara Forster

From: Forster, Sara
Sent: Thursday, January 22, 2015 4:24 PM
To: 'bpchase@sseeng.com'
Subject: Additional Information Request for Schultz Surveying & Engineering, Inc., NRC Lic. No. 24-32159-01

Dear Mr. Chase:

Please see the attached file for additional information needed to complete the review of the recent amendment request for NRC Lic. No. 24-32159-01. 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
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