

TRANSMISSION VERIFICATION REPORT

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UNITED STATES
NUCLEAR REGULATORY COMMISSION

REGION III
2443 WARRENVILLE ROAD, SUITE 210
LISLE, ILLINOIS 60532-4352

TELEFAX TRANSMITTAL

DATE September 22, 2015

NUMBER OF PAGES 8

SEND TO Rebecca Kuykendall, U.S. Silica, NRC License 12-35194-01

LOCATION Berkeley Springs, West Virginia

FAX NUMBER (304) 258-8288

VERIFY BY CALLING

FROM: Bill Reichhold
(Sender)

TELEPHONE NUMBER (630) 829-9839

FAX NUMBER (630) 515-1078

If you do not receive the complete fax transmittal, please contact the sender as soon as possible at the telephone number provided above.

MESSAGE See accompanying documents.



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NOTICE

This message is intended only for the use of the individual or entity to which it is addressed and may contain information that is privileged, confidential, or exempt from disclosure under applicable law. If the reader of this message is not the intended recipient or the employee responsible for delivering the message to the intended recipient, you are hereby notified that any dissemination, distribution or copying of this communication is strictly prohibited. If you received this communication in error, please notify the sender immediately by telephone and return the original to the above address, by U.S. Mail. Thank You.

As we discussed by telephone, we need additional information to complete the review of your request.

1. Please confirm that the change in address from 701 Boyce Memorial Drive, Ottawa, Illinois to **200 North LaSalle, Street, Suite 2100, Chicago, Illinois 60601**, is **only a mailing address change** and not a change in the locations of use for the nuclear gauges.
2. Please submit a course subject out-line for the Radiation Safety Officer training course taught by Dade Moeller Training Academy, which Tammy Metcalf attended in November 2014. The acceptable training criteria for authorized users and Radiation Safety Officers is in Appendix G of NUREG-1556, Volume 4. Please see accompanying documents.
3. Please submit the on-the-job "hands-on" training that Tammy Metcalf received with the nuclear gauges. Please see the "Supervised Hand-on Experience" section in Appendix G of NUREG-1556, Volume 4. Please see accompanying documents.
4. Please submit course subject out-line for the Radiation Safety Officer training course taught by Nevada Technical Associates, Inc., which Thomas P. Haney, Jr. attended in May 2015. The acceptable training criteria for authorized users and Radiation Safety Officers is in Appendix G of NUREG-1556, Volume 4. Please see accompanying documents.
5. Please submit the on-the-job, "hands-on" training that Thomas P. Haney, Jr. received with the nuclear gauges. Please see the "Supervised Hand-on Experience" section in Appendix G of NUREG-1556, Volume 4. Please see accompanying documents.

6. Please submit a "Delegation of Authority" for the new Radiation Safety Officer (RSO), Rebecca Kuykendall. You need to have the Chief Executive Officer (or designee) and the Radiation Safety Officer sign the "Delegation of Authority" document. – You also need to designate the number of hours per week the Radiation Safety Officer will spend on radiation safety activities.

Model Delegation of Authority to RSO

Memo To: Radiation Safety Officer
From: Chief Executive Officer (or designee)
Subject: Delegation of Authority

You, **(name of Radiation Safety Officer)**, 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 **(enter number of hours)** 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

Please send a facsimile (630- 515-1078) of your response to the above within 14 days and state, Response to Control 588610. Please include a cover letter on company letterhead, dated and signed (signed by an individual who is authorized to sign official documents on behalf of the licensee) with your response letter. Please call me at 630-829-9839 if you have any questions.

In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice," a copy of this facsimile and the attached documents will be available electronically for public inspection in the NRC Public Document Room or from the Publicly Available Records (PARS) component of NRC's document system (ADAMS). The NRC's document system is accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html> (the Public Electronic Reading Room).

From the desk of:



Bill Reichhold

Appendix G

Criteria for Acceptable Training for Authorized Users and Radiation Safety Officers



Criteria for Acceptable Training for Authorized Users and Radiation Safety Officers

Course Content

Classroom training may be in the form of lecture, videotape, or self-study emphasizing practical subjects important to safe use of the gauge:

Radiation Safety:

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

Regulatory Requirements:

- Applicable regulations
- License conditions, amendments, renewals
- Locations of use and storage of radioactive materials
- Material control and accountability
- Annual audit of radiation safety program
- Transfer and disposal
- Recordkeeping
- Prior events involving fixed gauges
- Handling incidents
- Recognizing and ensuring that radiation warning signs are visible and legible
- Licensing and inspection by regulatory agency
- Need for complete and accurate information

APPENDIX G

- Employee protection
- Deliberate misconduct

Practical Explanation of the Theory and Operation for Each Gauge Possessed by the Licensee:

- Operating and emergency procedures
- Routine vs. non-Routine maintenance
- Lock-out procedures

On-the-job training must be done under the supervision of an AU or RSO:

- Supervised Hands-on Experience Performing:
 - Operating procedures
 - Test runs of emergency procedures
 - Routine maintenance
 - Lock-out procedures

Training Assessment

Management will ensure that proposed AUs are qualified to work independently with each type of gauge with which they may work. Management will ensure that proposed RSO's are qualified to work independently with and are knowledgeable of the radiation safety aspects of all types of gauges to be possessed by the applicant. This may be demonstrated by written or oral examination or by observation.

Course Instructor Qualifications

Instructor should have:

- Bachelor's degree in a physical or life science or engineering
- Successful completion of a fixed gauge manufacturer's or distributor's course for users (or equivalent)
- Successful completion of an 8 hour radiation safety course; and
- 8 hours hands-on experience with fixed gauges

OR

- Successful completion of a fixed gauge manufacturer's or distributor's course for users (or equivalent)
- Successful completion of 40 hour radiation safety course; and
- 30 hours of hands-on experience with fixed gauges.

OR

- The applicant may submit a description of alternative training and experience for the course instructor.

Note: Additional training is required for those applicants intending to perform non-routine operations such as installation, initial radiation survey, repair, and maintenance of components related to the radiological safety of the gauge, gauge relocation, replacement, and disposal of sealed sources, alignment, or removal of a gauge from service. See Appendix N - "Non-Routine Operations."