

**From:** [Lanzisera, Penny](mailto:Lanzisera.Penny)  
**To:** [sprau@strahlung.com](mailto:sprau@strahlung.com)  
**Cc:** [jeannette@strahlung.com](mailto:jeannette@strahlung.com)  
**Subject:** Request for additional information for RSO change  
**Date:** Friday, August 26, 2016 10:40:00 AM

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Licensee: Department of Justice – Federal Bureau of Prisons  
License No. 32-25613-01  
Docket No. 03036175  
Mail Control No. 591072

Dear Dr. Sprau, in order to continue our review of your amendment request, please submit the following additional information:

1. Please confirm the change to the management representative from Tony Hiscocks, Associate Warden, to J.C. Holland, Complex Warden.
2. Please note that the training and experience submitted for Mr. Jeannette does not meet the waiver requirements referenced in your request. Specifically, neither license submitted included “accelerator-produced radioactive materials, discrete sources of radium-226, or both, for medical uses” as referenced in 10 CFR 35.57(a) (3). In addition, the medical use documented for accelerator use is more than 7 years ago and, therefore, does not meet the recentness of training requirements in 10 CFR 35.59. Please submit documentation described in 10 CFR 35.50(a) or (b), along with a preceptor attestation (35.50.d) and training in radiation safety, regulatory issues, and emergency procedures for medical use (35.50.e). You may use the form found at [http://www.nrc.gov/reading-rm/doc-collections/forms/nrc313a\(rso\).pdf](http://www.nrc.gov/reading-rm/doc-collections/forms/nrc313a(rso).pdf) to document the above. If relying on a degree to demonstrate the 200 hours of training; please submit a copy of the transcript showing the coursework that applies; along with any recent training.
3. You have requested that Mr. Jeannette be named Radiation Safety Officer (RSO) on your license. It appears that this individual may be an outside consultant\contractor. If this is so, in support of this request, please address the following:
  - a. Describe the control over the radiation safety program that will be delegated so that the consultant-RSO will be able to exercise authority over authorized users when confronted with radiation safety problems that require implementation of corrective actions.
  - b. Describe the relationship that will exist between the consultant-RSO and your institutional management regarding expenditure of funds to facilitate the objectives of your radiation safety program and related regulatory requirements.
  - c. Identify other commitments of the consultant-RSO for other NRC or Agreement State licensed facilities, along with a description of how the consultant-RSO will allocate time to permit the performance of the duties of the RSO as described in the regulations. State the consultant-RSO's minimum amount of on-site time (hours per week).
  - d. Appoint an in-house representative who will serve as the point of contact

during the RSO's absence. This person may be allowed to assist the consultant RSO with limited authority.

- e. Describe the overall availability of the consultant-RSO to respond to questions or operational issues that arise during the conduct of your radiation safety program and related regulatory requirements. Specify the maximum amount of time it will take the RSO to arrive at the facility in the event of an emergency that requires his presence.

You may submit the above requested information to my attention either via a signed pdf from management or via fax to 610-337-5269. In addition, please describe your availability pending completion of the RSO change. Thank you for your assistance,

Penny Lanzisera  
Senior Health Physicist  
US NRC, Region I