

Poston-Brown, Martha

From: Huckfeldt, Hilary <HHuckfeldt@ciner.us.com>
Sent: Thursday, September 29, 2016 11:55 AM
To: Poston-Brown, Martha R
Cc: Green, Kevin; Leffers, Scott
Subject: [External_Sender] Ciner License 49-11578-01 Inspection Follow-Ups
Attachments: 2016 annual audit.pdf

Good Afternoon Marti,

I have followed-up on the three items you requested for us to find from your inspection on the 15th.

1. No records were located verifying shutter operability during the semi-annual inventory inspections. The PM form will be changed to state that the technician will check shutter operability by opening/closing the shutter and Scott Leffers will verify this in the field during the next round of inspections with the technician.
2. No annual audits were found for 2013-2015 time frame. An annual audit of the program for 2016 was completed shortly after your inspection and is included in this email. Action items were discussed in a meeting yesterday and involve a lot of positive changes for the program, including: changing RSO on the license (initiated already see #3), changing PM forms and field verifying the inventory process with the technician (planned to complete next inventory round), updating the database with current leak test information (in process), updating the radiation safety plan (in process), awareness training for the plant (scheduled for annual MSHA refresher training in 2017), and many other items. Tasks have been added to the Outlook calendars to remind the RSO/back-up RSO to complete these annual audit each year.
3. No interim RSO paperwork was sent in to the NRC when Janet McCann retired. Paperwork was submitted to Carol Hill on 9/23/16 requesting a change of the license to list Hilary Huckfeldt as the RSO. That email will be forwarded to you separately.

Please let me know if there is anything else I can help you with. Have a great day!

****Please note my name change and new email address****

Thanks,

Hilary M. Huckfeldt
Environmental Specialist



Ciner Wyoming LLC
254 County Road 4-6 | PO Box 513 | Green River, WY 82935
Phone: (307) 872-7207
Fax: (307) 872-7309
Email: hhuckfeldt@ciner.us.com

Visit our website at www.ciner.us.com



FIXED GAUGE ANNUAL AUDIT CHECKLIST

License # 49-11578-01

Date of this Audit 9/16/16

Auditor Signature(s) Hilary Huchfeldt

Date 9/16/16

Scott Miller

9/16/16

Manager Signature Kevin J. Green

Date 9/19/16

Audit History

- | | | |
|--|---------------|---------------|
| A. Date of last Audit <u>3/15/2012</u> | YES | NO |
| B. Were audits conducted at intervals not to exceed 12 months? | <u> </u> | <u> ✓ </u> |
| C. Were records of previous audits maintained and available? | <u> ✓ </u> | <u> </u> |
| D. Were any deficiencies identified during last two audits or two years? | <u> ✓ </u> | <u> </u> |
| E. Were corrective actions taken?
(look for repeat deficiencies) | <u> ✓ </u> | <u> </u> |

Organization and Scope of Program

- | | | |
|--|--------------|---------------|
| A. If change of address or ownership changed was license amended? | <u> ✓ </u> | <u> </u> |
| B. N/A | | |
| C. Radiation Safety Officer | | |
| 1. If the RSO was changed, was license amended? <u>In Progress</u> | | |
| 2. Does new RSO meet NRC training requirements? <u>YES</u> Last Trning Date <u>8/26/16</u> | | |
| 3. Is RSO fulfilling his/her duties? <u>N/A</u> | | |
| 4. To whom does RSO report? <u>Kevin Green</u> | | |

Gauge Inventory

- A. Is a record kept showing the receipt of each gauge? (see database/files) YES
- B. Are all gauges physically inventoried every six months? (see Work Orders) YES
- C. Are records of inventory results with appropriate information maintained? (Oracle) YES

Training Records and Instructions to Workers

- A. Were all workers who are likely to exceed 100 millirem in a year instructed per 10 CFR 19.12? Was refresher training provided and records maintained? no body exceeds 100 mrem/yr
- B. Are training records available for each technician working with the gauges? yes, but need to retrain
- C. Did interviews with the technicians reveal they know the operating, emergency, and security procedures? yes, but need to be refreshed
- D. Did this audit include observations of the technicians performing routine cleaning etc. on the gauge?

NO

Personnel Radiation Protection

- A. Are ALARA considerations incorporated into the radiation protection program? **yes** but implementation could be improved
- B. Were prospective evaluations performed showing that unmonitored individuals receive 10% of limit? **improved**
- C. Did unmonitored individuals' activities change during the year which could put them over 10% of limit? **no, we don't need monitors currently**

Personnel Radiation Protection (continued)

- A. Are records of exposures, surveys, monitoring, and evaluations maintained? **none since last audit**

Public Dose

No radiation levels exceed 2 mrem in any one hour. ✓

Operating and Emergency Procedures

- A. Have operating and emergency procedures been developed? **yes** but need to be revised
- B. Do they contain the required elements? **yes**
- C. Does each individual working with the gauges have a current copy of the operating and emergency procedures (including lock-out procedures and emergency telephone numbers)? **no**
- D. Is a lock-out warning sign posted at each entryway to an area where it is possible to be exposed to the beam? **no, but could improve signage on belt scales**
- E. Did any emergency occur? **no**
 - 1. If so, were they handled properly? **N/A**
 - 2. Were appropriate corrective actions taken? **N/A**
 - 3. Was NRC notification or reporting required? **N/A**

Leak Tests

- A. Was each sealed source leak tested at prescribed intervals defined by the manufacturer? **yes**
- B. Was the leak test performed according to the license? **yes**
- C. Are records of results retained with the appropriate information included? **yes**
- D. Were any sources found leaking and if yes, was NRC notified? **no**

Maintenance of Gauges

- A. Are manufacturer's or distributor's procedures followed for routine cleaning and lubrication of gauge? **yes**
- B. Was each on-off mechanism tested for proper operation every 6 months? **no**
- C. Are repair and maintenance of components related to the radiological safety of the gauge performed by the manufacturer, distributor or person specifically authorized by the NRC? **N/A**
- D. Are labels, signs, and postings identifying gauges containing radioactive material, radiation areas, and lock-out procedures/warnings clean and legible? **yes**

Transportation

(This section does not apply if you have not transported gauges during the period covered by this audit)

A.- J. Manufacturer or distributor will package any device sent back to manufacturer or new devices received per DOT and 49 CFR standards and provide appropriate documentation.

- K. Are placards on vehicle, if needed?
- L. Proper overpacks, if used?
- M. Any incidents reported to DOT?

N/A

Radiation Survey Instruments

- A. Are calibration records maintained and are devices still calibrated?

out of calibration but have records

Auditor's Independent Survey Measurements (If made) N/A

Notifications and Reports

- A. Was any radioactive material lost or stolen? Were reports made? no
- B. Did any reportable incidents occur? Were reports made? no
 - a. Inoperable/"Stuck" shutter?
 - b. Generic Equipment Issues identified by licensee?
- C. Did any overexposures and high radiation levels occur? Reported? no
- D. If any events (as described in items A. through C. above) did occur, what was root cause? Were corrective actions appropriate? N/A
- E. Is the management/RSO or Disaster Officer aware of the telephone number for NRC Emergency Operations Center : (301) 816-5100 no

Posting and Labeling

- A. NRC - Form 3 "Notice to Workers" posted? yes - check for latest revision
- B. NRC regulations, license documents posted or a notice posted?
- C. Signs hanging from all devices? yes

Recordkeeping for Decommissioning

- A. Records kept of information important to decommissioning? Database and files yes
- B. Records include all information outlined in 10 CFR 30.35? yes

no decommissioning took place in 2016

Bulletins and Information Notices

- A. NRC Bulletins, NRC Information Notices, NMSS Newsletters, received? yes
- B. Appropriate training and action taken in response? N/A

Special License Conditions or Issues

- A. Did auditor review special license conditions or other issues (non-routine operations)? yes

Deficiencies Identified in Audit; Corrective Actions

- A. Summarize problems/deficiencies identified during audit. *see additional pages for*
- B. If problems/deficiencies identified in this audit, describe corrective actions planned or taken. This is the only licensed location. Include date(s) when corrective actions are implemented. *action items*
- C. Provide any other recommendations for improvement. *change how program is implemented on site*
- D. Describe communication with management about deficiencies. *notified K Green 9/19/16 of issues and meeting set 9/28/16 to address items*

Evaluation of other Factors

- A. Senior licensee management is appropriately involved with the radiation protection program and/or RSO oversight? *could be improved*
- B. RSO has sufficient time to perform his/her radiation safety duties? *current RSO retired*
- C. Licensee has sufficient staff to support the radiation protection program?
we need to have 2 people with current RSO training at all times.

Poston-Brown, Martha

From: Huckfeldt, Hilary <HHuckfeldt@ciner.us.com>
Sent: Thursday, September 29, 2016 11:56 AM
To: Poston-Brown, Martha R
Cc: Green, Kevin; Leffers, Scott
Subject: [External_Sender] FW: License Number 49-11578-01 RSO Amendment
Attachments: Certification_Documents_Huckfeldt.pdf; Resume 9.8.2016 for RSO.pdf; Statement_Of_Assertation_Signed.pdf; Letter_From_Leffers.pdf

Good Afternoon Marti,

Please see the request below and the attached documentation sent in requesting the RSO change on Ciner's License.

******Please note my name change and new email address******

Thanks,

Hilary M. Huckfeldt
Environmental Specialist



Ciner Wyoming LLC
254 County Road 4-6 | PO Box 513 | Green River, WY 82935
Phone: (307) 872-7207
Fax: (307) 872-7309
Email: hhuckfeldt@ciner.us.com

Visit our website at www.ciner.us.com

From: Huckfeldt, Hilary
Sent: Friday, September 23, 2016 1:03 PM
To: 'Carol.Hill@nrc.gov' <Carol.Hill@nrc.gov>
Cc: Green, Kevin <kgreen@ciner.us.com>; Rood, Craig <Crood@ciner.us.com>; Leffers, Scott <sleffers@ciner.us.com>
Subject: License Number 49-11578-01 RSO Amendment

Good Afternoon Ms. Hill,

Please see the attached request for changing Ciner's RSO on the license from Janet McCann to Hilary Huckfeldt. Please contact myself or Scott Leffers if you have any questions.

Have a great weekend!

******Please note my name change and new email address******

Thanks,

Hilary M. Huckfeldt

Environmental Specialist



Ciner Wyoming LLC

254 County Road 4-6 | PO Box 513 | Green River, WY 82935

Phone: (307) 872-7207

Fax: (307) 872-7309

Email: hhuckfeldt@ciner.us.com

Visit our website at www.ciner.us.com



LETTER OF CERTIFICATION

This is to certify that:

HILARY HUCKFELDT

**Final Score 96
Class Average 86.22**

Attended and successfully completed a course of instruction conducted under the auspices of Radiation Technology, Inc. August 22-26, 2016 and described in the attached course agenda. This course covers fundamentals of radiation, units of dose and quality of radiation fields, hazards of radiation exposure, detection devices, regulatory compliance, radiation safety program design and implementation, and specific training on installation, radiation surveys, and leak testing of devices containing radioactive material in sealed sources.

This course of instruction, together with prior experience, is structured to qualify persons who complete it to understand and safely perform various operations involving nuclear devices including the installation, relocation and leak testing of such equipment. The operations are to be done in accordance with the rules and regulations of the United States Nuclear Regulatory Commission and/or "Agreement States," and are in all respects subject to such rules and regulations.

This letter cannot be used in lieu of a specific license from or other sanction by an appropriate regulatory agency.

Radiation Technology, Inc.

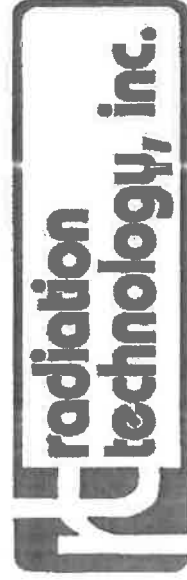
A handwritten signature in black ink, appearing to read 'P. Zelewski', is written over a horizontal line.

**Pamela Zelewski
Instructor**

CERTIFICATE OF COMPLETION

Hilary Huckfeldt

**HAS SUCCESSFULLY COMPLETED A COMPREHENSIVE
RADIATION SAFETY TRAINING COURSE (40 HOURS)
CONDUCTED BY RADIATION TECHNOLOGY, INC.**



Kenneth Krieger

**Kenneth Krieger
CHP/RSO/LSO**

Date: August 30, 2016



**RADIATION TECHNOLOGY, INC.
40-HOUR INDUSTRIAL RADIATION SAFETY TRAINING COURSE
AGENDA**

Radioactive Materials

- A. Isotopes
- B. Decay
- C. Half-life

Types of Radiation

Radiation Interaction with Matter

- A. Ionizing Radiation
 - 1. Electromagnetic
 - 2. Charged Particle
 - 3. Neutron
- B. Specific Ionization

Radiation Dosimetry

- A. Units & Dose Determination
- B. Quality Factor
- C. Gamma Exposure Rate
- D. Neutron Exposure Rate

Shielding

- A. Inverse Square Properties
- B. Time, Distance, Shielding
- C. Half-Value Layer
- D. Calculating Shield Thicknesses

Biological Effects

- A. Radiosensitivity
- B. General Cell Structure
- C. Radiation Exposure
- D. Radiation Damage
- E. Long Term Effects
- F. Internal Effects
- G. Dose Limits

Biological Effects (Con't)

- H. Total Accumulated Dose
- I. Radiation Protection Guides
- J. Natural Background Radiation

Radiation Detection

- A. Detection Instruments
 - 1. Design and Operation
 - 2. Procedures for Proper Use of Meters

Personnel Monitoring

- A. Requirements
- B. Devices

Applications for Radioactive Material

- A. Device & Capsule Design
- B. Posting
- C. Industrial Device Installation
 - 1. Requirements
 - 2. Surveying & Leak Testing Demonstration

"Hands-On" Practical Session

- A. Checkout and re-briefing on use of portable radiation survey meters
- B. Survey a Fixed Gauge
- C. Prepare Survey Forms
- D. Leak Test Devices

**Industrial Radiation Safety Training Course
Agenda
Page Two**

Regulatory Control

- A. Title 10 Code of Federal Regulations**
- B. Agreement States**
- C. Licensing Procedures**
- D. General vs. Specific License**
- E. User Responsibility**
- F. Radiation Protection Program**
 - 1. Recordkeeping**
 - 2. Posting**
 - 3. Training**
 - 4. Incident Reporting**
 - 5. Emergency Procedures**
- G. Inspections**

Shipping Radioactive Material

Liability Issues

Summary of Topics

- A. Role of Radiation Safety Personnel**
- B. Class Discussion**

Written Test on Lectures and Homework Assignments

Note: Homework is assigned each night during the course.

CERTIFICATE OF COMPLETION

Hilary Huckfeldt

has attended and participated in a training session designed to meet the specifications of 49 CFR 172.700(b) for individuals involved with the receipt of or preparation for transport of packages containing radioactive material.

Certification Expires August 26, 2019



Instructor
August 26, 2016





**RADIATION SAFETY TRAINING
FOR SHIPPING AND RECEIVING PERSONNEL
AGENDA**

Characteristics of Radioactive Material

Decay
Gamma and X-Radiation

Biological Effects

Radiosensitivity
Biological Response
Whole Body Acute Dose
Low Dose Radiation

Industrial Gauge Requirements

Gauge & Sealed Source Design/
Construction

Radiation Protection Guides

Occupational Dose Limits
Members of the Public

Units

Roentgen

Instrumentation

instruments Characteristics & Uses
Geiger-Mueller Tubes
Radiation Measurements
Survey Techniques

Shielding

Time, Distance, Shielding

Labeling and Documentation

Regulatory Requirements
Preparation of Materials for Transport
Requirements for Package Receipt
Group Exercise

Lectures were supported with written documentation, group discussions and hand-on activities.

For Radiation Technology, Inc.

A handwritten signature in black ink, appearing to read 'P. Zelewski'.

Pamela J. Zelewski
Safety & Regulatory Compliance

Ciner Wyoming LLC

PO Box 513
254 County Road 4-6
Green River, WY 82935
Phone: 307-875-2600



Scott Leffers, Electrical Project Engineer

P.O. Box 513
254 County Road 4-6
Green River, WY 82935
Phone: 307-872-7462
FAX: 307-872-7366

Date: September 19, 2016

Carol Hill

US NRC, Region IV
1600 East Lamar Boulevard
Arlington, Texas 76011
PH: 817-200-1140
Email: Carol.Hill@nrc.gov

RE: License Number 49-11578-01

Ms. Hill:

This correspondence is to request an amendment to our existing license. The proposed change is:

Remove Janet McCann as site RSO, and name Hilary Huckfeldt as site RSO. Janet McCann has retired. Hilary Huckfeldt initially completed 40-hr training conducted by Radiation Technology, Inc. on August 26, 2016.

Please see the attached contact information for Hilary Huckfeldt, and Statement of Assertion, and documentation of training.

If you have any questions, please call.

Thanks,

Scott Leffers, Prior Site RSO listed

**cc: K. Green
C. Rood
S. Leffers
H. Huckfeldt
File Copy**

Ciner Wyoming LLC

PO Box 513
254 County Road 4-6
Green River, WY 82935
Phone: 307-875-2600



Contact Information for Hilary

Hilary Huckfeldt
Ciner Wyoming LLC
P.O. Box 513
Green River, Wyoming 82935
Environmental Specialist
Phone: 307-872-7207
Fax: 307-872-7309
Email: hhuckfeldt@ciner.us.com

Hilary M. Huckfeldt

Work – hhuckfeldt@ciner.us.com

Office – (307) 872-7207

Education:

Bachelor of Science: Environmental Science, May 2013

Westminster College, New Wilmington, PA

Magna cum laude, GPA: 3.775

Historian of Beta Beta Beta Biological Honors Society, Member of Pi Sigma Pi Academic Honors Society

Relevant Employment:

Environmental Specialist, Ciner Wyoming LLC

Green River, Wyoming, May 2016 – Present

My current role involves the management of wastes from the mine/refinery, drinking water reporting to EPA Region 8, pest control, managing the waterfowl rehabilitation program, implementing GIS, permitting with WYPDES activities, TSCA reporting, SEO well permitting, asbestos abatement, and permitting/reporting activities with the Wyoming DEQ Land Quality Division.

Environmental Field Technician, Ciner Wyoming LLC (Formerly OCI Wyoming LLC)

Green River, Wyoming, January 2014 – May 2016

My job included supervising the waterfowl rescue and rehabilitation program reporting to the USFWS and WGF, water sampling (groundwater & dams), minor project management, SWPPP and SPCC inspections, EPA Method 9 inspections, filter changes on PM10 monitors, GIS analyses, operating groundwater interceptor systems, and other various field duties. I collaborated with peer working on land quality and state engineer permitting and reporting, waste management, tailings management, stack testing, pest control, and perimeter security.

Rangeland Ecologist, Aster Canyon Consulting, Inc.

Pinedale, Wyoming, May 2013 – October 2013

I conducted quantitative and qualitative vegetation surveys to assess reclamation efforts on gas/oil well pads and along pipelines, while identifying and eliminating noxious weeds with pesticides. I also conducted pygmy rabbit surveys, wetland delineations, and Erosion Control Re-vegetation and Restoration Plans. The collected data was analyzed using Excel and ArcGIS 9 and then reported to the operators and government agencies.

Mosquito Program: Surveillance Field Technician, Summit County Public Health

Stow, Ohio, May – August 2011 and 2012

My summer internships with the county used integrated pest management to reduce disease carrying mosquito populations. I determined pesticide application locations, trapped and counted mosquitoes to test for West Nile Virus, and trained new staff on daily and safety procedures.

Certifications:

Radiation Safety Training (40-Hour), Radiation Technology, Inc., August 2016

DOT Radioactive Material Receipt/Preparation, Radiation Technology, Inc., August 2016 – August 2019

DOT Ground Transportation, DGI, March 2016 – March 2019

RCRA Hazardous Waste 5 Day Training, McCoy and Associates, February 2016

MSHA Surface Metal/Non-Metal Annual Refresher, Ciner Wyoming LLC (renewed annually since 2014)

MSHA New Miner Surface Metal/Non-Metal, OCI Wyoming, L.P., January 2014

EPA Method 9 Certification, Opacitek, March 2014 – Present (renewed semi-annually)

OSHA 10 hour, Square Top Consulting, Inc., May 2013

PEC PREMIER SafeLand USA, Square Top Consulting, Inc., May 2013

T.R.A.P. (Terrorist Response Awareness Training), Square Top Consulting, Inc., May 2013

Shell Upstream Americas Online General HSE Orientation, June 2013

North Rockies Safety and SimOps Orientation – Encana, July 2013

Awards:

Quick Hit Awards for hazard mitigation (Ciner Wyoming LLC)

January 2015 *Night Out on the Town Award* for superior execution of the 2014 waterfowl rescue season

Skills:

Scientific Skills: Soldering small electronics, qualitative and quantitative flora and fauna monitoring, wetland delineations, backpack spraying, groundwater sampling, dam safety instrumentation, dewatering pump system repairs, waterfowl rescue management, operating an airboats and amphibious 8 wheel boats, using Garmin GPS hand-held units and mapping software, surveying pond elevations, SWPPP inspections, hazardous waste determinations, reporting to government agencies, permitting

Computer Skills: Proficient with ArcGIS 10, ArcGIS 9, Microsoft Word, Excel, PowerPoint, Access, Adobe Photoshop CS3, Garmin Basecamp, Pi, and DNR GPS

Language Skills: Limited working proficiency in Spanish, Elementary proficiency in German