

Cassata, James

From: Cassata, James
Sent: Friday, February 24, 2017 10:49 AM
To: 'joe@ddk.com'
Subject: RSO Leaving - Instructions to Apply for a New RSO; APPLIED DIAMOND, INC., 07-35115-01, 030-38695
Attachments: Applied Diamond Delegation of Authority.pdf; NRC 313 Amendment Applied Diamond.pdf; Lei Chen License Amendment.docx; nrc313.pdf; NRC License for Applied Diamond 07-35115-01; 030-38695.pdf
Importance: High

APPLIED DIAMOND, INC.,
License Number: 07-35115-01
Docket Number: 030-38695

Mr. Tabelaing,

Per our discussion this morning, your request to name yourself as RSO needs to be submitted as an amendment on NRC Form 313. You can send it by U.S. Mail to the address for Region 1 on the application but if possible I recommend emailing your amendment request and forms to me in order to expedite the process. It can take up to 90-days to complete but I would try to get it assigned to me and process it as quickly as possible.

I am including your last submission in December of 2016 as a reference to filling out the current request and I have provided a blank form.

Please fill in answers to NRC Form 313 questions 1-4, 13 (Certifying officer's printed name (yourself), signature, and date of signing).

You also need to answer question 7 by stating that you are applying for a change in the Radiation Safety Officer (RSO) to be yourself and for a change in authorized users (taking Dr. Lei Chen off and adding someone else if desired).

Normally you would need to provide a delegation of authority for the RSO, which in this case seems ridiculous since you would be giving the delegation of authority to yourself. Therefore, in your case as President and RSO you won't need to include the delegation of authority as it is understood that you have that authority as President of your company.

The NRC believes that to demonstrate adequate training and experience, the RSO should have:

- (1) at a minimum, a college degree at the bachelor's level, or equivalent training and experience in physical, chemical, biological sciences, or engineering; and
- (2) training and experience commensurate with the scope of proposed activities.

To that end please provide the following information as part of your application.

- Your educational degree(s) obtained.
- Information demonstrating that you as the proposed RSO are qualified by training and experience to include, as a minimum:
 - Formal training or education in radiation safety
(Topics covered, duration of training, when training was received, identity and location of training provider.)
(Note: a course outline may be provided)
 - Experience using licensed materials

(Types, forms, quantities handled, activities performed, and duration of experience.)

– Experience performing the duties of an RSO

(Activities, duration of experience, scope of program.)

Since your license is for minimal quantities of radioactive material and is of limited scope, the experience level of the individual to be RSO could also be minimal (including no experience) as long as they had the formal training or education in radiation safety.

Additional guidance, such as RSO duties and qualifications can be found in NU-REG 1556 Vol 7, “Program-Specific Guidance about Academic, Research and Development, and Other Licenses of Limited Scope Including Electron Capture Devices and X-Ray Fluorescence Analyzers,” and downloaded at <http://www.nrc.gov/reading-rm/doc-collections/nuregs/staff/sr1556/> .

Please don't hesitate to contact me if you have any questions or need further assistance. I am including a copy of your current license for your convenience.

Here is a link to the NRC's public website. <https://www.nrc.gov/>

James R. Cassata, Ph.D., CHP
Health Physicist
Nuclear Regulatory Commission (NRC), Region I
Division of Nuclear Materials Safety (DNMS),
Commercial, Industrial, R&D, and Academic Branch (CIRDA)
Office: 610-337-5303
Fax: 610-337-5269
james.cassata@nrc.gov