

October 17, 2017

Laura Cender
U.S. Nuclear Regulatory Commission
Materials Licensing Branch
Laura.cender@nrc.gov
630-829-9712

Laura,

This letter is to address the concerns of the NRC per the email on 10/13/17, Commitment and accessibility of the RSO (Dwane Spurgeon). How the RSO and SDI LaFarga will ensure that the radioactive isotope Cf-252 will be used in a safe manner, and that the NUREG 1556 Vol.4 Rev.1 and SDI LaFarga requirements are being implemented and followed.

My RSO training and working knowledge of radioactive material gives me the understanding of the seriousness of the RSO title and is why I put the RSO duties for SDI LaFarga at the top of my commitments. My superior, Shane Smith (Northern Indiana divisional manager), understands that commitment and has agreed to put my RSO duties to SDI LaFarga as the number one priority. I have been committed from the start of the Gamma analyzer project, providing guidance as the equipment is being laid-out and installed, to being available to answer any questions, making site visits, and making adjustments as needed.

A binder with the complete program for the Gamma Analyzer has been created, all the procedures, documents and records in one place.

A contact list will be at the front of the Gamma Analyzer binder with my personal cell number along with office number and email address. The RSO will be listed as the first contact person.

My personal cell number is listed on the emergency procedure that will be posted in the Gamma hut. My OmniSource office is located 7 miles from SDI LaFarga and I can be onsite in 13 minutes if needed.

I will be at the basic radiation safety training sessions and I will introduce myself to employees as the RSO for SDI LaFarga, communicating where they can find my phone number and not to hesitate to call me for any concerns.

Jerry Evans has signed the Delegation of Authority and understands that I am the RSO, and, knows to contact me with any issues or concerns he or his employees have with the Gamma analyzer program, or, the source contained inside.

Jerry Evans (Operations Manager for SDI LaFarga, LLC.) is onsite and available for employees and oversees day to day operations, including the Gamma analyzer program.



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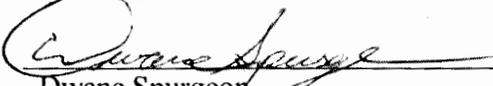
Jerry will be the keeper of the key for the Gamma Analyzer when replenishment of the sources is needed. Jerry has a good understanding of radioactive isotopes for he has spent 9 years in the Navy working with, instructing and training personnel on nuclear energy. Jerry will be a great asset to me when I'm not onsite.

As a quality manager for OmniSource I understand the significant importance of documented procedures, training, constant monitoring and the auditing of programs like this to ensure compliance and keep our employees safe.

Safety is the number one item of SDI's strategic focus. At no time will SDI LaFarga put plant goals or objectives above the safety of its employees.

Let me know if you need anything more

Sincerely,


Dwane Spurgeon

Quality Manager, RSO
OmniSource, LLC

10/18/17
Date


Shane Smith

Northern Indiana Divisional Manager
OmniSource, LLC

10/18/17
Date


Jerry Eyans

Operational Manager
SDI LaFarga, LLC

18 Oct 17
Date

Cender, Laura

From: Spurgeon, Dwane <DSpurgeon@omnisource.com>
Sent: Wednesday, October 18, 2017 12:38 PM
To: Cender, Laura
Subject: [External_Sender] RE: SDI La Farga NRC New License Request
Attachments: NRC letter 101717 emailed.pdf

Laura, attached is the letter to address section two of the below email.
I am waiting on the drawing so as soon as I get it I will complete section one of your email.

Let me know if you have any questions
Dwane

From: Cender, Laura [mailto:Laura.Cender@nrc.gov]
Sent: Friday, October 13, 2017 9:48 AM
To: Spurgeon, Dwane
Subject: SDI La Farga NRC New License Request

Good morning Dwane,

I left a voicemail a few days ago regarding the remaining information that will be required to complete the licensing process for your fixed gauge. Please review the points below and provide this information by Oct. 31, 2017. Please let me know if additional time will be required.

1. Please submit a facility diagram that marks the location where licensed material will be stored pending source change out performed by a licensed vendor; include on the diagram the use of adjacent areas, including above and below. Note that a facility diagram showing locations where radioactive material may be stored is considered security related information, please submit this information via fax to 630-515-1078, or via email with the attached doc/pdf being password protected. The password could then be told to me via phone.
2. The following is a portion of text taken from NRC guidance document NUREG 1556 Vol. 4. Rev. 1 "Program Specific Guidance Regarding Fixed Gauge Licensees" describing Radiation Safety Officer responsibilities: "He or she should have *sufficient time and commitment from management to fulfill his or her duties and responsibilities* to ensure that radioactive materials are used in a safe manner, approved radiation safety procedures are being implemented, and the required records of licensed activities are maintained."
 - a. Please describe how you will be able ensure an appropriate level of time commitment and site availability/accessibility to fulfill your RSO duties (ex. how people at SDI La Farga will know and be able to contact you, nearby location to the site, etc.).
 - b. Please also include a statement signed by your supervisor or someone higher in your chain of command at Omnisource confirming they are aware of your RSO commitments and that you will be allowed sufficient time to conduct your RSO responsibilities at SDI La Farga.

Please let me know if you have any questions.

Thanks, and have a great weekend.

-Laura

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