

SNYDER
& ASSOCIATES

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October 17, 2017

Materials Licensing Section
US Nuclear Regulatory Commission, Region III
2443 Warrenville Road, Suite 210
Lisle, IL 60532-4352

RE: ADDITIONAL INFORMATION FOR RENEWAL APPLICATION FOR MATERIAL
LICENSE (NO. 24-32019-01)

Enclosed please additional information needed to process the Renewal Application for Material
License (24-32019-01), Docket No. 030-34569.

I trust this is the information you require at this time. If you have any questions or comments please
call 816-364-5222 or fax 816-364-6086.

Sincerely,

SNYDER & ASSOCIATES, INC.

Larry Bradshaw, R.S.O.

LB:ak

Enclosures

C:\Users\lfbradshaw\AppData\Local\Microsoft\Windows\Temporary Internet Files\Content.Outlook\SYHFNYSM\2017-10-17_Letterhead.docx

802 FRANCIS STREET | ST. JOSEPH, MO 64501-1916
P: 816-364-5222 | F: 816-364-6086 | SNYDER-ASSOCIATES.COM

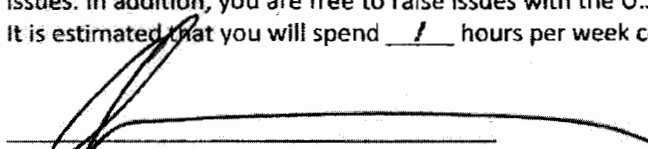
Model Delegation of Authority to Radiation Safety Officer

Memo To: Radiation Safety Officer

From: Management Representative

Subject: Delegation of Authority

You, LARRY BRADSHAW, 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 1 hours per week conducting radiation protection activities.



Signature of Management Representative (Name)
Manager Title Andy Macias, P.E. Branch Manager

10/11/17

Date

I accept the above responsibilities,



Signature of Radiation Safety Officer

10-11-17

Date

cc: Affected department heads

Item 7. INDIVIDUAL RESPONSIBLE FOR RADIATION SAFETY PROGRAM AND THEIR TRAINING AND EXPERIENCE

The Radiation Safety Officer (RSO) for the license applied for herein shall be Mr. Larry (JR) Bradshaw. (A copy of Mr. Bradshaw's qualifications, resume, radiation safety training certificate – are attached.)

Item 8. TRAINING FOR INDIVIDUALS WORKING IN OR FREQUENTING RESTRICTED AREAS

Before using licensed materials, authorized users will have successfully completed one of the training course described in Criteria in the section entitled "Training for Individuals Working In or Frequenting Restricted Areas" in NUREG-1556, Vol. 1, Rev. 2, "Consolidated Guidance About Materials Licenses: Program-Specific Guidance About Portable Gauge Licenses".

Item 9. FACILITIES AND EQUIPMENT

Drawings of storage locations and statements enclosed. See Public Dose and Operating, Emergency and Security Procedures.

Item 10. RADIATION SAFETY PROGRAM

The radiation safety program shall encompass the following:

- 10.1 Audit Program – The applicant is not required to and should not, submit its audit program to NRC for review during the licensing phase.
- 10.2 Radiation Monitoring Instruments – We will either possess and use, or have access to and use, a radiation survey meter that meets the Criteria in the section entitled "Radiation Safety program – Instruments" in NUREG-1556, Vol.1, Rev. 2, "Consolidated Guidance About Materials Licenses: Program-Specific Guidance About Portable Gauge Licenses", in the event of an incident.
- 10.3 Material Receipt and Accountability – Physical inventories will be conducted at intervals not to exceed 6 months, to account for all sealed sources and devices received and possessed under the license.

And

We will develop, implement, and maintain procedures for ensuring accountability of licensed materials at all times.

- 10.4 Occupational Dosimetry – We will maintain, for inspection by NRC, documentation demonstrating that unmonitored individuals are not likely to receive a radiation dose in excess of the limits in 10 CFR Part 20.1502(a).
- 10.5 Public Dose – The applicant is not required to submit a response to the public dose section during the licensing phase. The matter will be examined during an inspection.
- 10.6 Operating, Emergency and Security Procedures – We will implement and maintain the operating, emergency, and security procedures in Appendix G of NUREG-1556, Vol. 1, Rev. 2, “Consolidated Guidance About Materials Licenses: Program-Specific Guidance About Portable Gauge Licenses”. Copies of these procedures will be provided to all gauge users and will be available at each job-site.
- 10.7 Leak Test – Leak tests will be performed at intervals approved by NRC or an Agreement State and specified in the Sealed Source and Device Registration Sheet. Leak tests will be performed by an organization authorized by NRC or an Agreement State to provide leak testing services for other licensees or using a leak test kit supplies by an organization authorized by NRC or an Agreement State to provide leak test kits to other licensees and according to the kit supplier’s instructions. Records of leak test results will be maintained.
- 10.8 Maintenance – Routine Cleaning and Lubrication
- We will implement and maintain procedures for routine maintenance of our gauges according to each manufacturer’s recommendations and instructions.
- Non-Routine Maintenance
- We will send the gauge to the manufacturer or other person authorized by NRC or an Agreement State to perform non-routine maintenance or repair operations that require the removal of the source or source rod from the gauge.
- 10.9 Transportation – The applicant is not required to submit its response to transportation during the licensing process. However, this issue will be reviewed during inspection.

Cender, Laura

From: Larry (JR) Bradshaw <lbradshaw@snyder-associates.com>
Sent: Wednesday, October 18, 2017 5:28 PM
To: Cender, Laura
Subject: [External_Sender] Addition license renewal documentation
Attachments: Scan0060.pdf

My phone number is 660-541-2000 if you have any questions. Have a great day !!

Thank you, Larry

~~NOTICE: This E-mail (including all attachments) is covered by the Electronic Communications Privacy Act, 18 U.S.C. §§ 2610-2521, is confidential and may contain legally privileged information. If you are not the intended recipient, you are hereby put on notice that any retention, dissemination, distribution, or copying of this communication or any part thereof is strictly prohibited. Please call or reply to the sender immediately that you have received this message in error, then permanently delete it.~~ LBC

Cender, Laura

From: Cender, Laura
Sent: Tuesday, October 10, 2017 10:34 AM
To: 'lfradshaw@snyder-associates.com'
Subject: NRC License No. 24-32019-01 Renewal - Additional Information Requested
Attachments: Model Delegation of Authority to Radiation Safety Officer.docx; 10.3 and 10.7 - missing statements.pdf

Hello Larry,

As we discussed this morning, I have attached a sample copy of a Delegation of Authority letter. Please note that this letter must be signed by yourself and someone in your senior management chain; the letter may be edited as necessary to meet your company's needs. Additionally, Items 10.3 and 10.7 of your listed in your initial application were both missing part of the suggested statement. I have attached a copy of the full statements and highlighted the portions that were missing.

Also, please confirm that the name on the license should be listed as "Snyder and Associates," – this was the name stated on the submitted NRC Form 313, but the license currently states the name "Snyder & Associates."

Please provide your response with a signature and date, and please let me know if you have any questions. I can be reached directly at 630-829-9712, or via email.

Thank you,
Laura

Laura Cender
U.S. Nuclear Regulatory Commission
Materials Licensing Branch
E-mail: Laura.Cender@nrc.gov
Phone: (630) 829-9712