



CONVERSATION RECORD

3/26/2018

NAME OF PERSON(S) CONTACTED OR IN CONTACT WITH YOU

Stan Fronckewicz

DATE OF CONTACT

3/26/2018

TYPE OF CONVERSATION

E-MAIL

TELEPHONE

INCOMING

OUTGOING

E-MAIL ADDRESS

sfronckewicz@vancebrothers.com

TELEPHONE NUMBER

(816) 923-4325

ORGANIZATION

Vance Brothers, Inc.

DOCKET NUMBER(S)

030-39099

LICENSE NUMBER(S)

24-35478-01

CONTROL NUMBER(S)

602609

SUBJECT

License Amendment Request - Authorized Users

SUMMARY

You recently submitted a new license request to the NRC. In order to continue processing of your licensing request please submit the following items listed on Page 2 of this record.

In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice," a copy of this letter and its enclosure will be available electronically for public inspection in the NRC Public Document Room or from the NRC's Agencywide Documents Access and Management System (ADAMS), accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html>.

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ACTION REQUIRED (IF ANY)

Please submit the information requested on Page 2 of this document by no later than April 27, 2018. You may submit your request via email to laura.cender@nrc.gov. If you submit any information via Fax please address it to my attention using the heading "Additional Information to Control No. 602609" to facilitate proper handling within our office.

Please contact me at 630-829-9712 or via email if you have any questions.

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NAME OF PERSON DOCUMENTING CONVERSATION

Laura B. Cender

SIGNATURE

Laura B. Cender 3/26/2018

CONVERSATION RECORD (continued)

SUMMARY: (Continued from page 1)

1. Please provide records showing that the proposed RSO has received hands on training that meets the requirements of the attached NUREG 1556 Vol 1. Rev. 2 Appendix C. The training certificates provided were issued from an online training course and additional information must be submitted to verify the proposed RSO has had hands on experience using a portable gauge.

You can meet this requirement by providing one of the following:

- a. A statement confirming that you have received hands on training signed by an RSO listed on an NRC or Agreement State license. Please include the name of the individual signing the letter and their license number.
- b. An additional training certificate that verifies you have received hands on training. Note that not all in-person training offers hands on training.
- c. A copy of an NRC or Agreement State License that currently, or on a previous amendment, has listed you as the radiation Safety Officer.

Please refer to the highlighted sections of the attached Appendix C regarding what NRC requirements for hands on training topics.

2. Provide a signed Delegation of Authority memo for the proposed RSO. See attached.

3. During our conversation you mentioned using information provided by the gauge manufacturer Troxler Electronic Laboratories in helping you prepare your application. There are also several places within Item 10 of your application titled "Radiation Safety Program" where you commit to exclusively using Troxler products and services. You may request to withdraw this section of your application and instead submit the attached copy of NUREG 1556 Vol 1. Rev. 2 Appendix B - which covers the same application areas, but does not commit you to using any specific companies.

4. Please provide a few days where you would be able to support a Pre-Licensing Site Visit in the late April-May time frame. The visit itself will last around an hour. Due to travel times it would likely be best to plan for having the visit in the early afternoon.

5. Please ensure that your response is signed and dated.

APPENDIX C

**CRITERIA FOR ACCEPTABLE TRAINING COURSES FOR
PORTABLE GAUGE USERS**

Criteria for Acceptable Training Courses for Portable Gauge Users

Course Content

Acceptable course content for training courses for portable gauge users includes the following:

- 1.5 to 2 hours of radiation safety and regulatory requirements, emphasizing practical subjects important to safe use of the gauge; radiation versus contamination; internal versus external exposure; concepts of time, distance, and shielding to minimize exposure; control and surveillance of gauges; location of the sealed source within the portable gauge; inventory; recordkeeping; incidents; licensing and inspection by the regulatory agency; need for complete and accurate information; employee protection; and deliberate misconduct
- 1.5 to 2 hours of practical training, to include portable gauge theory, operating procedures, emergency procedures, security, maintenance, and transportation procedures; and field training emphasizing radiation safety, including dry runs of setting up and making measurements with the gauge, controlling and maintaining surveillance over the portable gauge, performing routine cleaning and lubrication, packaging and transporting the gauge, storing the gauge, and following emergency and security procedures

Course Examination

Prospective gauge users participating in training courses should achieve at least a 70-percent score on a 25- to 50-question written test. The test should include the following:

- an emphasis on radiation safety of portable gauge storage, security of gauges while on jobsites, use, sealed source location, maintenance, and transportation, rather than the theory and art of making portable gauge measurements
- review of correct answers to missed questions with the prospective gauge user following the scoring of the test

Instructor Training and Experience

Instructors should have, at a minimum, the following:

- successful completion of a portable gauge user course
- successful completion of an 8-hour radiation safety course or radiation safety officer-training course
- documentation of 8 hours of hands-on experience with portable gauges

Notes:

- Licensees must maintain records of training for 3 years following the last use of licensed material by the authorized user.
- Initial and recurrent (every 3 years) U.S. Department of Transportation hazardous material (HAZMAT) training is also required for all gauge users that transport gauges (see Section 8.10.9, "Transportation").

Online Courses

Online training for portable gauge users is acceptable. The online training topics should follow the suggested Course Content on the previous page. Any online training should be supplemented by the practical hands-on training also described under Course Content. The applicant/licensee should demonstrate how it will meet the training described under Course Content and may consider providing a copy of the curricula covered in the course.

Online training courses should also include an examination described under Course Examination.

Model Delegation of Authority to Radiation Safety Officer

Memo To: Radiation Safety Officer

From: Management Representative

Subject: Delegation of Authority

You, _____, 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 _____ hours per week conducting radiation protection activities.

Signature of Management Representative (Name)
Manager Title

Date

I accept the above responsibilities,

Signature of Radiation Safety Officer

Date

cc: Affected department heads

Item No. and Title	Suggested Response	Yes	Alternative Procedures Attached
10.1 RADIATION SAFETY PROGRAM—AUDIT PROGRAM	The applicant should not submit its audit program to the NRC for review during the licensing phase. The audit program will be reviewed during NRC inspections.	Need Not Be Submitted with Application	
10.2 RADIATION SAFETY PROGRAM—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 titled, "Radiation Safety Program—Radiation Monitoring 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.	<input type="checkbox"/>	<input type="checkbox"/>
10.3 RADIATION SAFETY PROGRAM—MATERIAL RECEIPT AND ACCOUNTABILITY	Physical inventories will be conducted every 6 months or at other intervals approved by the NRC 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.	<input type="checkbox"/>	<input type="checkbox"/>
10.4 RADIATION SAFETY PROGRAM—OCCUPATIONAL DOSE	We will maintain, for inspection by the NRC, documentation demonstrating that unmonitored individuals are not likely to receive a radiation dose in excess of the limits in 10 CFR 20.1502(a). OR We will provide and require the use of individual monitoring devices (dosimetry). All personnel dosimeters that require processing to determine the radiation dose will be processed and evaluated by a NVLAP-approved processor.	<input type="checkbox"/> <input type="checkbox"/>	<input type="checkbox"/>

Cender, Laura

From: Cender, Laura
Sent: Monday, March 26, 2018 2:29 PM
To: 'sfronkewicz@vancebrothers.com'
Subject: New NRC License Request - Additional Information Required
Attachments: 1556 Vol. 1, Rev. 2 Appendix B Item 10 Radiation Safety Program Form.pdf; Model Delegation of Authority to Radiation Safety Officer.docx; NUREG 1556 Vol.1 Rev. 2 Appendix C (003).pdf; Conversation Record to Vance Brothers Inc..pdf

Hello Stan,

Thank you for calling me back regarding your new license request. I have attached a record of our conversation that includes the additional information required for continued processing of the licensing action.

Please feel free to contact me at 630-829-9712 or via email if you have any questions, or if anything is unclear.

Thank you,
Laura

Laura Cender
U.S. Nuclear Regulatory Commission
Materials Licensing Branch
E-mail: Laura.Cender@nrc.gov
Phone: (630) 829-9712
Fax: 630-515-1078