



CONVERSATION RECORD

NAME OF PERSON(S)/TITLE CONTACTED OR IN CONTACT WITH YOU		DATE OF CONTACT		TYPE OF CONVERSATION	
William L. Van Horn		03/27/2019		<input type="checkbox"/> E-MAIL <input checked="" type="checkbox"/> TELEPHONE <input type="checkbox"/> INCOMING <input checked="" type="checkbox"/> OUTGOING	
E-MAIL ADDRESS		TELEPHONE NUMBER			
bvanhorn@doerun.com		573-626-2194			
ORGANIZATION		DOCKET NUMBER(S)			
The Doe Run Company		030-29604			
LICENSE NAME AND NUMBER(S)		MAIL CONTROL NUMBER(S)			
The Doe Run Company License No. 24-24815-01		611446			
SUBJECT					
License Amendment Request - Additional Information Required					
SUMMARY AND ACTION REQUIRED (IF ANY)					
<p>This record is a summary of the conversation that occurred between Laura Cender and William L. Van Horn on March 27, 2019 regarding the license amendment request dated February 19, 2019.</p> <p>Per our discussion today, please provide your signed and dated response to the following items by no later than April 19, 2019.</p> <ol style="list-style-type: none"> 1. Please provide a Delegation of Authority memo (attached) for Mr. Justin Dix. This form is used to formally appoint an individual to the position of RSO, and outlines some of the responsibilities of the position. This form is to be signed by both Mr. Justin Dix and his senior management. 2. Please confirm that you wish to name Mr. Justin Dix and Ms. Keely Woods as authorized users in Condition 11 of you license. 3. Please provide a statement confirming that Mr. Justin Dix and Ms. Keely Woods have received the hands on training described in the attached copy of NUREG 1556 Vol. 4 Rev. 1 Appendix D. 					
NAME OF PERSON DOCUMENTING CONVERSATION					
Laura B. Cender					
SIGNATURE				DATE OF SIGNATURE	
<i>Laura B. Cender</i>				3/27/2019	

CONVERSATION RECORD (continued)

LICENSE NAME AND NUMBER(S)

The Doe Run Company
License No. 24-24815-01

MAIL CONTROL NUMBER(S)

611446

SUMMARY AND ACTION REQUIRED (IF ANY) (Continued)

4. Please confirm that you request to add Mr. Justin Dix to Condition 17.A. to perform non-routine maintenance activities.

5. Due to changes to our licensing process, Items 6-9 on your license will now be listed differently going forward. Specifically, instead of allowing a blanket amount of material to be split between multiple types, each individual device manufacturer and model will now be listed separately on their own line with their own possession limit on the license. In order to facilitate this change please provide the following information for each individual device to be authorized on the license:
 - a.) Isotope Requested
 - b.) Device Manufacturer
 - c.) Device Model
 - d.) Number of devices requested.
 - e.) Maximum activity requested for any single source or device
 - f.) Total activity requested for devices of this manufacturer and model.
 - g.) For any of these devices, if a specific sealed source type is used please also include the manufacturer and model number.

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

APPENDIX D

**CRITERIA FOR ACCEPTABLE TRAINING FOR
AUTHORIZED USERS AND RADIATION SAFETY OFFICERS**

CRITERIA FOR ACCEPTABLE TRAINING FOR AUTHORIZED USERS AND RADIATION SAFETY OFFICERS

Course Content

Classroom training may be in the form of lectures, videos, computer-based sessions, or self-study lessons that emphasize practical subjects important to the safe use of the gauge including the following:

Radiation Safety:

- radiation versus contamination
- internal versus external exposure
- biological effects of radiation
- types and relative hazards of radioactive material possessed
- as low as is reasonably achievable (ALARA) concept
- use of time, distance, and shielding to minimize exposure
- location of sealed source within the gauge

Regulatory Requirements:

- applicable regulations
- license conditions, amendments, and renewals
- locations of use and storage of radioactive materials
- material control and accountability
- annual audit of radiation safety program
- transfer and disposal
- recordkeeping
- prior events involving fixed gauges
- handling incidents
- recognizing and ensuring that radiation warning signs are visible and legible
- licensing and inspection by regulatory agency
- need for complete and accurate information
- employee protection
- deliberate misconduct

Practical Explanation of the Theory and Operation for Each Gauge Possessed by the Licensee:

- operating, emergency, and security procedures
- routine versus nonroutine maintenance
- lock-out procedures

Supervised, Hands-On Experience (On-the-Job Training) Involving:

- operating procedures
- test runs of emergency procedures
- routine maintenance
- lock-out procedures

Note: On-the-job training must be done under the supervision of an authorized user (AU) or radiation safety officer (RSO).

Training Assessment

Management will ensure that proposed AUs are qualified to work independently with each type of gauge with which they may work. Management will ensure that proposed RSOs are qualified to work independently with and are knowledgeable of the radiation safety aspects of all types of gauges that may be possessed by the applicant.

Course Instructor Qualifications

Instructors should have, at a minimum, the following:

- successful completion of a fixed gauge manufacturer's or distributor's course for users (or equivalent)
- successful completion of an 8-hour radiation safety course or RSO training course
- documentation of 8 hours of hands-on experience with fixed gauges

Note: Additional training is required for those applicants intending to perform nonroutine operations, such as gauge installation; initial radiation survey; repair and maintenance of components related to the radiological safety of the gauge; gauge relocation; replacement, and disposal of sealed sources; gauge alignment; or removal of a gauge from service. See Appendix J of this NUREG, "Information Needed to Support Applicant's Request to Perform Nonroutine Operations."

Cender, Laura

From: Cender, Laura
Sent: Thursday, March 28, 2019 8:00 AM
To: 'bvanhorn@doerun.com'
Subject: RE: NRC License No. 24-24815-01 Amendment Request - Additional Information Required
Attachments: March 27, 2019 Conversation Record to The Doe Run Company - Signed.pdf

Hello Bill,

As promised, attached is a signed copy of our conversation record from yesterday.

Thank you,
Laura

From: Cender, Laura
Sent: Wednesday, March 27, 2019 12:37 PM
To: 'bvanhorn@doerun.com' <bvanhorn@doerun.com>
Subject: NRC License No. 24-24815-01 Amendment Request - Additional Information Required

Hello Bill,

Thank you for reaching out to me this afternoon regarding your pending NRC license amendment request. As we discussed, I have attached a record of our conversation describing the additional information required to complete your amendment, along with the supporting documents that we discussed.

Unfortunately I am working at a remote job site today and do not have access to a scanner to send you a signed copy of our conversation record. I will send you a signed copy tomorrow morning, but there will be no changes to the enclosed content.

Please feel free to contact me at 630-829-9712 or send me an email if you have any questions.

Respectfully,
Laura Cender

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