



CONVERSATION RECORD

NAME OF PERSON(S)/TITLE CONTACTED OR IN CONTACT WITH YOU		DATE OF CONTACT	TYPE OF CONVERSATION	
Stephen Porterfield		06/10/2019	<input type="checkbox"/> E-MAIL	<input type="checkbox"/> INCOMING <input checked="" type="checkbox"/> OUTGOING
E-MAIL ADDRESS	TELEPHONE NUMBER		<input checked="" type="checkbox"/> TELEPHONE	
stephen.porterfield@buzziunicemusa.com		(573) 335-5591		
ORGANIZATION		DOCKET NUMBER(S)		
Lone Star Industries, Inc. d/b/a Buzzi Unicem USA		030-32408		
LICENSE NAME AND NUMBER(S)		MAIL CONTROL NUMBER(S)		
24-26333-01		NA		
SUBJECT				
NRC License Amendment Request				
SUMMARY AND ACTION REQUIRED (IF ANY)				
<p>This is a record of the conversation that occurred between Laura Cender and Stephen Porterfield on June 10, 2019 regarding the licensee's interest in amending their NRC License No. 24-26333-01 to add additional sources and name a new radiation safety officer.</p> <p>To request an NRC amendment please submit a signed and dated cover letter that includes the license number and clearly explains the changes requested. The amendment request may be submitted via fax to 630-515-1078 or via mail to the NRC Region III office at the address listed below:</p> <p>U.S. Nuclear Regulatory Commission Materials Licensing Branch 2443 Warrenville Road Suite 210 Lisle, IL 60532</p> <p>To authorize a new fixed gauging device on your license, please ensure the following information is provided:</p> <ul style="list-style-type: none"> a.) Isotope requested b.) Device manufacturer c.) Device model d.) Number of devices requested 				
NAME OF PERSON DOCUMENTING CONVERSATION				
Laura B. Cender				
SIGNATURE			DATE OF SIGNATURE	
Laura B. Cender			6/10/2019	

CONVERSATION RECORD (continued)

LICENSE NAME AND NUMBER(S)

MAIL CONTROL NUMBER(S)

24-26333-01

NA

SUMMARY AND ACTION REQUIRED (IF ANY) (Continued)

- e.) Maximum activity to be authorized for any single device
- f.) Total activity requested for devices of this manufacturer and model
- g.) For any of these devices, if a specific sealed source is used please include the manufacturer and model number

To appoint a new radiation safety officer (RSO) on your license please ensure that the following information is provided:

- a.) Contact information for the proposed RSO including telephone number and email
- b.) Training records that show that the proposed individual has completed training equivalent to the training described in NUREG 1556 Vol. 4 Rev. 1 Appendix D (attached)
- c.) A completed Delegation of Authority memo to be signed by both the proposed RSO and their senior management. See attached. Please ensure that the names and titles of the individuals signing the form are printed beneath the signature line.

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."

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

Cender, Laura

From: Cender, Laura
Sent: Monday, June 10, 2019 2:36 PM
To: stephen.porterfield@buzziunicemusa.com
Subject: NRC Licensing Information - License No. 24-26333-01
Attachments: Conversation Record to Buzzi Unicem.pdf; NUREG 1556 Vol. 4 App. D. - Training Requirements for AU and RSO's.pdf; Model Delegation of Authority to Radiation Safety Officer.docx

Hello Stephen,

Thank you for reaching out to me today regarding your interest in amending your NRC License No. 24-26333-01. Attached is a record of our conversation which lists the information required to add new sources to your license and to also change your radiation safety officer.

If you have any questions please feel free to reach out to me at 630-829-9712 or send me an email. If I am unavailable you may also reach out to our general licensing number at 630-829-9887 and request to speak with a license reviewer.

Thank you,
Laura

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