



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION III
2443 WARRENVILLE RD. SUITE 210
LISLE, IL 60532-4352

JUN 20 2019

Karen Lapajenko McGuire
Radiation Safety Officer
U.S. Army Tank-Automotive and Armaments Command
ATTN: AMSTA-CSC-Z, Mail Stop 485
6501 E. Eleven Mile Road
Warren, MI 48397-500

Dear Ms. McGuire:

We have reviewed your amendment request dated May 21, 2019. Before we can take further actions, we will need the following additional information.

- 1) Provide a copy of the delegation of authority for the Radiation Safety Officer (RSO) for Mr. Joseph E. Hart (a copy of the sample memo is enclosed for your reference).
- 2) Provide specific information that Mr. Joseph E. Hart has been trained and is familiar with NRC regulatory requirements in 10 CFR 19, 20, 21, 30, and 40.
- 3) NRC License No. 21-32838-02 authorizes the use of nuclear portable gauges and therefore the training and experience for the RSO listed in this license has been reviewed using the licensing guidance in NUREG-1556, Volume 1, Revision 2 which can be found in the NRC's web page at <https://www.nrc.gov/docs/ML1617/ML16175A375.pdf>. In accordance with Section 8.7.1 in the NUREG, the proposed RSO should complete the following: a) a portable gauge training provided by the gauge manufacturer, with hands-on experience with portable gauges or 2) equivalent training as discussed in Appendix C of the NUREG. Please provide additional information regarding Mr. Hart's training and experience that meets the training and experience discussed in NUREG-1556, Volume 1, Revision 2.
- 4) NRC License No. SUB-1536 listed you as the only user. If you will no longer perform your works under this license after your retirement, please provide a request to remove your name from the license. If your name be removed from the license, the licensee will need to propose a new user to name on the license because an NRC license could not be issued without a qualified user.

We request that you submit the response in writing by July 18, 2019. Please date and sign the response and reference Mail Control Number 612274 in the cover letter to facilitate proper mail handling in our office. To expedite the licensing process, you could fax your response to 630-515-1078 or scan and email your response as a pdf file to frank.tran@nrc.gov. If you have any questions or require clarification on any of the information stated above, please do not hesitate to contact me at 630-829-9887 or frank.tran@nrc.gov.

In accordance with Title 10 Code of Federal Regulations 2.390 of the U.S. Nuclear Regulatory Commission's (NRC) "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>.

Sincerely,


Frank P.D. Tran
Health Physicist
Materials Licensing Branch

License Nos. 21-32838-01, 21-32838-02, SUB-1536
Docket Nos. 030-38500, 030-38588, 040-08994

Model Delegation of Authority to RSO

Memo To: Radiation Safety Officer
From: Chief Executive Officer (or designee)
Subject: Delegation of Authority

You, _____, have been appointed radiation safety officer and are responsible for ensuring the safe and secure 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

Date

Name

Title

I accept the above responsibilities,

Signature of Radiation Safety Officer

Date

cc: Affected department heads