



CONVERSATION RECORD

09/18/2019

NAME OF PERSON(S) CONTACTED OR IN CONTACT WITH YOU Lydia Brownell		DATE OF CONTACT 09/18/2019	TYPE OF CONVERSATION <input type="checkbox"/> E-MAIL <input checked="" type="checkbox"/> TELEPHONE <input type="checkbox"/> INCOMING <input checked="" type="checkbox"/> OUTGOING
E-MAIL ADDRESS lydia.brownell@modot.mo.gov		TELEPHONE NUMBER (573) 526-4628	

ORGANIZATION Missouri Dept. of Transportation	DOCKET NUMBER(S) 030-18363
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LICENSE NUMBER(S) 24-20415-01	CONTROL NUMBER(S) 612026
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SUBJECT
Additional Information Needed for License Renewal

SUMMARY

This record is in reference to the request to renew your NRC materials license dated April 15, 2019, and the resulting conversation between the RSO, Lydia Brownell, and NRC license reviewer Erin Kennedy. Please carefully review the items listed on page 2 of this record and provide a signed and dated response letter by October 1, 2019.

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ACTION REQUIRED (IF ANY)

Please submit your response by October 1, 2019, and reference it to my attention as "additional information to control number 6612026" to facilitate proper handling in our office. Your response must be currently dated and signed. If you have any questions or require clarification of any of the information stated above, please do not hesitate to contact me at 630-829-9876

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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NAME OF PERSON DOCUMENTING CONVERSATION
Erin Kennedy

SIGNATURE

CONVERSATION RECORD (continued)

SUMMARY: (Continued from page 1)

This conversation record details the additional information you will need to provide in order to authorize the request to renew your NRC Lic. No. 24-20415-01:

1) As we discussed, it is our current policy to add all permanent storage locations to the license and tie down facility diagrams. It is my understanding that it would not impact your current business model to list your facilities on your license. Please provide a statement requesting to add the facilities listed in Appendix A of your application to your license. In addition, please include a discussion of the historical leak test data for all the gauges you have possessed under your license. (specifically, have you ever had a leaking source at any of your facilities over the life of your license?)

2) In your renewal application, you did not account for one Humboldt model 5001 portable gauge and one InstroTek model 3500 portable gauge which are listed on Amendment No. 26 of your license. If you would like to remove these gauges from your license please provide the following documentation:

- a. A list (including the serial numbers) of all the Humboldt model 5001 and all the InstroTek model 3500 gauges that you have ever possessed under your license
- b. Documentation of the final leak test results for each of those gauges
- c. Records of transfer for each of those gauges to an authorized entity

3) Please provide a current delegation of authority, signed by both the RSO and a representative of your senior management. A model delegation of authority can be found in Appendix D of NUREG-1556, Volume 1, Revision 2, "Consolidated Guidance About Materials Licenses: Program-Specific Guidance About Portable Gauge Licenses," . For your convenience, I have attached a sample delegation of authority to this conversation record.

4) In your renewal application, you requested to preform analysis of leak tests at your facility. Additional guidance can be found in Appendix I of NUREG-1556, Volume 1, Revision 2. Specifically, please provide written commitments which address the training of individuals authorized to preform leak test analysis and your facilities and equipment:

a. Training of Individuals Authorized to Preform Leak Test Analysis:

Before allowing an individual to perform leak testing, the licensee must ensure that he or she has sufficient classroom and on-the-job training to show competency in performing leak testing and sample analysis independently.

Classroom training should cover the following subject areas:

- principles and practices of radiation protection
- radioactivity measurements, monitoring techniques, and instrument use
- mathematics and calculations used for measuring radioactivity
- biological effects of radiation

Appropriate on-the-job-training consists of the following:

- observing authorized personnel collecting and analyzing leak test samples
- collecting and analyzing leak test samples under the supervision and in the physical presence of an individual authorized to perform leak testing and sample analysis

b. Facilities and Equipment:

- To ensure achieving the required sensitivity of measurements, analyze leak tests in a low-background area.
- Use a calibrated and operable radiation survey instrument to check leak test samples for gross contamination before they are analyzed.
- Analyze the leak test sample using an instrument that is appropriate for the type of radiation to be measured [e.g., NaI (Tl) well-counter system for gamma-emitters, liquid scintillation for beta-emitters, and gas-flow proportional counter for alpha-emitters].
- If the sensitivity of the counting system is unknown, determine the minimum detectable activity (MDA).
- Number each wipe to correlate with identifying information for each source.