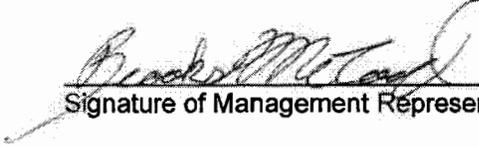


Model Delegation of Authority to Radiation Safety Officer

Memo To: Radiation Safety Officer
From: Chief Executive Officer
Subject: Delegation of Authority

You, Armando Lamas, 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 2 hours per week conducting radiation protection activities.

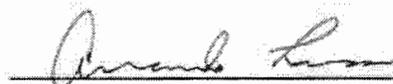


Signature of Management Representative

10/29/19

Date

I accept the above responsibilities,



Signature of Radiation Safety Officer

10-29-19

Date

cc: Affected department heads

CLARKSON CONSTRUCTION COMPANY
KANSAS CITY, MISSOURI

Radiation Safety Program

RADIATION SAFETY OFFICER

1. To ensure that all terms and conditions of the license are being met and that the information contained in the license is up-to-date.
2. To ensure that the equipment has been leak tested in the required timely manner and that the leak test is performed as prescribed by the gauge manufacturer.
3. To ensure that the use of the equipment is only used by individuals that have been authorized by the Radiation Safety Officer and that all users wear personnel monitoring equipment when using the gauge.
4. To maintain the records required by the license and the regulations. These records shall include personnel exposure records, leak test records, training certificates for all users, and an inventory of gauges.
5. To ensure that the equipment is properly secured against unauthorized removal at all times when it is not in use.
6. To serve as a point of contact and give assistance in case of emergency and to notify the proper authorities if needed.
7. To ensure that all users have read and understand the radiation safety operating and emergency procedures.

OPERATING PROCEDURES

TRANSPORTATION OF EQUIPMENT

1. All possible means shall be provided to ensure that the equipment is fully secured in the transporting vehicle and the equipment is away from the passenger compartment. When

transporting in an enclosed vehicle (car or van), the vehicle will be locked. When transporting in an open bed vehicle, the gauge will be securely fastened and locked to the bed. In any situation, the case should be blocked and braced to prevent shifting.

2. The gauge will be transported in the Troxler transportation case. The U.S. Department of Transportation requires the case to be properly labeled.
3. At all times during transport, the operator must have a properly completed Bill of Lading and Emergency procedures for each gauge.

UTILIZATION PROCEDURES

1. When the gauge is in the field, the authorized user must maintain control over the gauge at all times. The gauge must never be left unattended.
2. When not taking measurements, the gauge should be placed in the transportation case and returned to its permanent storage area as soon as possible. The gauge is to be used only for its intended purpose. By doing so, any radiation exposure will be as low as reasonably achievable.
3. When using the equipment, the authorized or designated user will wear the personnel monitoring device that has been assigned to him. When not using the equipment, the individual's personnel monitoring device is to be stored in a designated radiation free area.

MAINTENANCE AND LEAK TEST PROCEDURES

1. Periodic maintenance includes cleaning the gauge. During maintenance, the person performing the maintenance must wear his own personnel monitoring device.
2. No maintenance is to be performed that includes removal of the source(s) from the gauge. For this type of maintenance, the gauge must be returned to the Troxler Service Department.
3. The leak test is to be performed using the Troxler Model 3880 Leak Test Kit, according to instructions accompanying the kit. During any maintenance, the person performing the maintenance must wear his own personnel monitoring device.

EMERGENCY PROCEDURES

In the event of physical damage to a gauge, the following steps must be taken:

1. Locate the gauge and/or source.

2. Do not touch or move the gauge.
3. Immediately cordon off an area around the nuclear gauge and/or source. A radius of fifteen feet (5m) will be sufficient. Do not leave the area unattended.
4. Keep all unauthorized personnel from the nuclear gauge.
5. If a vehicle is involved, it must be stopped until the extent of contamination, if any, can be established.
6. The gauge use should perform a visual inspection of the nuclear gauge to determine if the source housing and/or shielding has been changed.
7. Use a survey meter to measure the dose rate at a distance of one meter (3 ft.) from the gauge.
8. Contact the company Radiation Safety Officer, and provide the RSO with the following:
 - the date, time and location of the accident,
 - the gauge model and serial number,
 - the nature of the accident,
 - the location and condition of the gauge and/or source,
 - the dose rate at one meter (3 ft.) from the gauge.
9. If you are unable to reach the RSO, than call the appropriate regulatory agency.
10. Follow the instructions of the RSO. The RSO will report the incident to the regulatory agency. The RSO will also notify the USDOT of accidents during transport if required.
11. Before shipping a damaged gauge to Troxler, obtain a RGA (returned goods authorization) number from the Troxler RSO.

In the event that a gauge is lost or stolen, the Radiation Safety Officer listed above is to be notified immediately.

Pavon, Sandy

From: Kelly, Jason
Sent: Wednesday, October 30, 2019 4:16 PM
To: Pavon, Sandy
Cc: Tomczak, Tammy
Subject: FW: Additional info_Amendment_Radioactive Material License #24-32024-02
Attachments: 20191029_NRC_Delegation of Authority to RSO.pdf

Sandy,

Below is a response I received. If possible, please add this to ADAMS and have a copy routed to my mailbox. I am currently out of the office. I have not conducted a SUNSI Review on this response.
Thanks for your help.

Jason

From: Armando Lamas <ALamas@clarksonconstruction.com>
Sent: Tuesday, October 29, 2019 3:22 PM
To: Kelly, Jason <Jason.Kelly@nrc.gov>
Subject: [External_Sender] Additional info_Amendment_Radioactive Material License #24-32024-02

Jason,
Attached please find the information you requested for the amendment on Radioactive Material License #24-32024-02.

Mail Control Number 61606
License no. 24-32024-02
Docket no. 030-38813

Let me know if this qualifies as a response to your letter or if you need this hard copy mail or fax.

Thanks,
Armando

Armando Lamas | Quality Manager
Clarkson Construction Company
o. [816.483.8800](tel:816.483.8800) m. [816.808.8389](tel:816.808.8389)
www.clarksonconstruction.com

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