



UNITED STATES
NUCLEAR REGULATORY COMMISSION

REGION III
2443 WARRENVILLE RD. STE 210
LISLE, IL 60532-4352

NOV 19 2019

Todd A. Houts
Director, Environmental
Health & Safety
c/o Gary Ward Vice Chancellor of Operations
The Curators of the University of Missouri
900 East Stadium Blvd., Suite 180
Columbia, MO 65211

Dear Mr. Houts:

This is the official agency record hard copy of the request for additional information (RFAI) we discussed on November 7, 2019. An emailed version of this RFAI was transmitted to you and Mr. Dobej via email on November 8, 2019.

This refers to the letter dated August 23, 2019, ("the letter") requesting an interim Radiation Safety Officer (RSO) for NRC License No. 24-00513-32 while your search for a permanent RSO continues.

Your letter stated that you wish to name Ronald J. Dobej, Jr., CHP as your interim RSO, effective September 1, 2019.

This also refers to the telephone call on November 7, 2019, between you, Todd A. Houts, Ronald J. Dobej, Jr., and me concerning the following clarifications and additional information pertaining to this request.

1. The letter states, in part, that "Though Dr. Langhorst's consulting contract to serve as interim RSO ends August 31, 2019, she has agreed to continue to provide consulting support for MU's interim RSO while MU continues to actively recruit to hire a new permanent RSO."

Please describe, clarify and explain in greater detail what is meant by "consulting support." Additional context will enhance the clarity of our understanding of this term relative to your request.

2. I noted that, contrary to the assertion in your letter that Mr. Dobej meets the RSO qualifications under 10 CFR 35.57(a) because he is currently named as RSO on MURR's broad scope license no. 24-00513-39, this is incorrect. License No. 24-00513-39 is not a medical use license and therefore it cannot serve as a qualifying license to support Mr. Dobej's request to become interim RSO under License No. 24-00513-32.

The definitions in 10 CFR 35.2 of "Medical Use" and "Radiation Safety Officer" relate to our conclusion.

There are many different types of licenses, including broad scopes and non-broad scopes, but only medical use licenses can be considered under 10 CFR 35.57.

Please confirm that your understanding in this matter is in alignment with ours.

3. The letter states that Mr. Dobey "has also served as a member of MU's Radiation Safety Committee for 10 years and was the MU Deputy RSO in the 1990s."

Please specify by month and year (month is optional but preferred) the bounding dates for Mr. Dobey's service as a member of MU's Radiation Safety Committee and as the MU Deputy RSO and state which license he served under.

4. During our telephone call, you and Mr. Dobey stated that no new medical uses were being accepted for consideration by your Radiation Safety Committee until the RSO position is filled by a permanent appointee who is named by NRC to this license. This is information that did not appear in the letter.

Please confirm that our understanding in this matter is correct and if it is not, please explicitly state the correct representation and commitment you intended.

5. Mr. Dobey's qualifications, as presented in the letter, state that he has Comprehensive Certification by the American Board of Health Physics as of October 1992 and that he is recertified through 2020.

We were able to corroborate his certification by ABHP in October 1992 but we could not verify his recertification through 2020.

Please provide evidence that Mr. Dobey's ABHP certification is valid through 2020.

6. The letter further states that, "Because of the special circumstances of Mr. Dobey's appointment as interim RSO, we have included in the delegation of authority letter documentation of my (meaning Todd Houts') acceptance as the MU point of contact with limited authority..."

As we discussed in the telephone call on November 7, 2019, please describe in more specific terms what you meant in this statement. Please provide an example or two that illustrates your meaning and intentions regarding Todd Houts' service as "the MU point of contact with limited authority."

7. A description of Mr. Dobey's duties and responsibilities as interim RSO was not provided in the letter.

Please provide a description of Mr. Dobey's duties and responsibilities as interim RSO. You may wish to consult the NUREG 1556 Series documents that pertain to this license, including Volumes 11 Rev.1, 9 Rev. 3, 1 Rev. 2 and 7 Rev. 1. Links to these volumes may be found on our website at: <https://www.nrc.gov/reading-rm/doc-collections/nuregs/staff/sr1556/>.

Within 10 days of the date of this letter, please provide only one complete, written response to these issues that is currently dated and signed by a senior management representative. If an

alternative timeframe for response is needed please contact me directly. Or, if you have any specific questions concerning this letter or the information we are requesting, please contact me at either (630) 829-9841 or (800) 522-3025, ext. 9841. My fax number is 630-515-1078. My email address is colleen.casey@nrc.gov.

Please do not resubmit any information beyond the scope of our specific requests, such as if you were to resubmit your letters in entirety again. Resubmitting in entirety, unless we request it, often delays the progress of our review without benefit to your licensed program.

Your written response should be addressed to my attention at the above address, as "additional information to control number 613981."

The fastest and most reliable means of transmitting your response is to fax it to 630-515-1078. If you must email a PDF version of it to me instead of faxing it, please send it to me at colleen.casey@nrc.gov.

Under no circumstances should you send us more than one copy or by more than one means of transmission. Doing so usually introduces errors and delays in processing of your response.

For assistance preparing your response, please use our guidance documents in the NUREG 1556 series, focusing on Volumes 1, Rev. 2; 7; 9, Rev. 2; and 11, as applicable. All are on our website at <http://www.nrc.gov>.

In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice," a copy of this letter 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,



Colleen Carol Casey
Materials Licensing Branch

License No. 24-00513-32
Docket No. 030-02278
Control No. 613981