

JUL 21 1989

License No. 29-13613-02  
Docket No. 030-07022  
Control No. 110673

Radiation Technology, Incorporated  
ATTN: John N. Scandalios  
President  
Lake Denmark Road  
Rockaway, New Jersey 07866

Gentlemen:

This letter is in reference to your letter dated May 1, 1988, as amended by letter dated July 3, 1989 requesting that Messrs. Shapiro and Schlecht be approved as Radiation Safety Officers on License No. 29-13613-02. Based on the information you have documented and submitted to date, these individuals do not have sufficient irradiator or equivalent experience to warrant their authorization as Radiation Safety Officer (RSO) for your licensed program. As a minimum, your RSO should have at least three months of actual experience in the use and operations of a pool irradiator. You may submit additional information concerning Messrs. Schlecht and Shapiro's training and experience or you may elect to submit the name of another individual who has the training experience commensurate with the duties of RSO. Enclosed is the "Guide for the Preparation of Applications for License for the Use of Panoramic Wet Source - Storage Irradiators" which specifies the training and experience requirements for Radiation Safety Officer.

You have provided information regarding contracted services of Westinghouse Radiological Services, Inc. and Mr. Tass Varaklis. It is unclear how you would fill the positions of both Corporate and Site Radiation Safety Officer, key positions, which, if unfilled, would result in cessation of operations involving radiation. Please describe your method of filling these key positions so that it can be authorized by license amendment.

If your intent is to utilize Mr. Buring as Radiation Safety Officer, please confirm. In addition, relative to Mr. Buring your application is deficient and you are requested to provide the following additional information.

1. Although Mr. Buring does not have three months of actual irradiator experience, he does possess twenty years experience in radiation safety and health physics. In order to authorize him as RSO, he will need additional training in the emergency and operating procedures associated with your facility. Please specify the training he will receive relative to irradiator operations and your licensed program prior to assuming the duties of RSO. Your description should include an outline of training to be provided and the hours spent on each subject. As a minimum, Mr. Buring should successfully pass the RTI operators qualification examination.

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2. Specify the number of hours that Mr. Buring will spend on site in the capacity of RSO. Your letter dated July 20, 1989 indicates that Mr. Buring will be on site for forty hours per week and he will be on call for forty hours per week. Please confirm. If you intend to operate the irradiator for longer than eighty hours per week, please specify who will be available to respond to emergencies that may arise at your facility.
3. Additional audits should be performed to ensure safety and compliance as Mr. Buring initially assumes the duties of RSO. Please confirm that the audits required by condition 20.A of your license will be performed every two weeks for the first two months that Mr. Buring is RSO and copies of these audits will be provided to NRC in accordance with your existing license condition.
4. In your letter dated July 19, 1989, you submitted an organizational chart showing Tass Varakliss as the Corporate Site RSO in a consultant capacity. Please submit a revised organizational chart that reflects your current structure with a proposed full-time RSO. This chart should reflect a commitment to retain experienced staff through this transition period.

In light of the resignations of Tass Varakliss and John Russen, it is important that RTI select a qualified individual to serve as RSO and amend its license promptly. In order to allow us sufficient time to review your submittal and amend your license, please respond to this letter by the close of business on Monday, July 24, 1989. In telephone conversations with you and John Schlecht, it has been agreed that a meeting to complete discussions on this issue will be held in our office on July 27, 1989.

Sincerely,

ORIGINAL SIGNED BY  
LEE H. BETTENHAUSEN

Lee H. Bettenhausen, Chief  
Nuclear Materials Safety Branch  
Division of Radiation Safety  
and Safeguards

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J. Miller/bc

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