

October 29, 1998

NOTE TO: Larry W. Camper
Branch Chief
Materials Safety Branch
Division of Industrial and
Medical Nuclear Safety, NMSS

FROM: Steven L. Baggett, Deputy Branch Chief
Materials Safety Branch
Division of Industrial and
Medical Nuclear Safety, NMSS

Signature 10/29/98

SUBJECT: LIMITED SIGNATURE AUTHORITY FOR ERIC COMPTON

As requested, I have attached a memorandum for your signature granting Eric Compton limited signature authority. I would like to point out the following for your consideration prior to signing the memorandum.

- According to Manual Chapter 1246, NMSS Office Director certifies that Headquarters reviews are qualified under this chapter or his designee, including interim qualifications. I'm only aware that the Division Director has signed all the past signature authority memorandums for both sealed source and license reviewers. My only issue here, is that will the Branch Chief signature carry the same weight as the Division Directors for this authority.

- Management Directive 5.6 states that "All initial and concurrence reviews are performed by persons having adequate training.". This individual with signature authority should have a bachelors degree or equivalent training in physically and or life sciences and including the following:

- understand and interpret, if necessary, appropriate prototype tests that ensure the integrity of the products under normal, and likely accidental conditions of use,
- understand and interpret test results,
- read and understand blueprints and drawings,
- understand how the device works and how safety features operate,
- understand and apply appropriate regulations,
- understand the conditions of use,
- understand external dose rates, source activities, and nuclide chemical form, and
- understand and utilize basic knowledge of engineering materials and their properties."

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I'm concerned that this limited authorization may not be defensible at the IMPEP review of the program, given that Eric does not have a bachelors degree or equivalent training in physical and/or life sciences. We don't provide the same training program to Co-op employees as we do for the other sealed source staff due to their typically short work duration. Further, Eric has not done enough x-ray florescence analyzer casework to demonstrate a mastery of the review process for this type of case. Eric also has no formal courses in health physics and has just enough understanding of radiation protection to evaluate the applicants regarding safety criteria question associated with the 32.26.

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NAME	SBaggett:tk	
DATE	10/29/98	