JAN 30 1989

NMLS: VHC Control No. 462373

Department of the Interior ATTN: Kenneth C. Rozas, Manager Fish and Wildlife Service Engineering Service Center 143 Union Blvd. P. O. Box 25207 Denver, Colorado 80225-0207

Gentlemen:

This is in reference to your letter received January 24, 1989, requesting an amendment to your byproduct material license for use of sealed sources in portable gauging devices. We have reviewed your application and have the following comments and need for additional information.

Although you identified Mr. Kenneth White as your Radiation Safety Officer, you did not adequately describe his qualifications. The individual responsible for your radiation safety program, as a minimum, should have completed the device manufacturer's training program or should have received equivalent training.

If the responsible individual has received training other than that provided by the device manufacturer, you should provide a description of the training course, including the topics covered, the time spent on each topic, and the name and qualifications of the instructor. As a minimum, the topics covered in the training should include radiation safety principles and practices for using the device, regulatory requirements pertaining to the use of the device, and instructions and practice in using the device. The instructor should have training equivalent to completion of an 80-hour course in radiation safety principles and practices and should have experience in the use of portable gauging devices.

Provide Mr. White's qualifications for review in accordance with Item 7 of the Regulatory Guide.

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Department of the Interior

In order to continue prompt review of your application, we request that you submit your response to this letter within 30 calendar days from the date of this letter. Please reply in duplicate and refer to Control No. 462373.

Sincerely,

Original Signed By: Vivian H. Campbell

Vivian H. Campbell Nuclear Materials Licensing Section

Enclosure:

Draft Regulatory Guide FC 407-4, "Guide for the Preparation of Applications for Licenses for the Use of Sealed Sources in Portable Gauging Devices"

bcc: R. L. Bangart