



**UNITED STATES
NUCLEAR REGULATORY COMMISSION**

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

September 3, 2020

Brian Mangogna
General Manager, SEMO
The Doe Run Company
P.O. Box 500
Viburnum, MO 65566

Dear Mr. Mangogna:

This letter is in reference to your request dated August 11, 2020, requesting an amendment to Materials License #24-24815-01.

The NRC's guidance document for your type of license, which I will be referring to below as "the guidance", is NUREG-1556, Volume 4, Rev. 1, dated July 2016, "Consolidated Guidance About Materials Licenses, Program – Specific Guidance About Portable Gauge Licenses." This guidance is available on the NRC Web site at:

<https://www.nrc.gov/docs/ML1617/ML16175A375.pdf>

Upon review of your request, I identified the following area requiring additional or clarifying information:

Section 8.7.1, "Radiation Safety Officer," Section 8.7.2, "Authorized Users," and Section 8.10.8, "Maintenance," of the guidance identifies that individuals responsible for performing or overseeing the performance of non-routine operations, including installation, initial radiation surveys and relocation of fixed gauging devices, must have completed specialized training for the activities to be performed or supervised.

You have requested that Keely Woods, Maintenance Superintendent, be designated as Radiation Safety Officer and as an Authorized User responsible for performing non-routine operations. Though, your request did not provide documentation of her training and experience related to the performance of non-routine operations.

Acceptable training and experience includes completion of a manufacturer/distributor's course for non-routine operations or an equivalent. Please state whether Ms. Woods has had the required training and provide complete documentation supporting this training.

To continue the review of your amendment request, please submit a written response to this letter by October 3, 2020. Your response must be dated and signed by a licensee's representative and please reference Mail Control Number 622783 in the response. To expedite the licensing process, you may fax your response to (630) 515-1078. If you have any questions or require clarification on any of the information stated above, you may contact me at (630) 829-9737 or Jason.Kelly@nrc.gov.

In accordance with Title 10 of the *Code of Federal Regulations* Section 2.390 of the U.S. Nuclear Regulatory Commission's (NRC) "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,

Jason M. Kelly, MPH
Health Physicist
Materials Licensing Branch

License No. 24-24815-01
Docket No. 030-29604
Control No. 622783