



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
REGION III  
2443 WARRENVILLE RD. SUITE 210  
LISLE, IL 60532-4352

November 16, 2020

Brad McCormick  
Radiation Safety Officer  
Ferris State University  
200 Ferris Dr.  
Big Rapids, MI 49307

Dear Mr. McCormick:

We have reviewed your request dated October 26, 2020, to name Anne Hawkins-Badge as the Radiation Safety Officer on U.S. Nuclear Regulatory Commission (NRC) Material License No. 21- 15237-01 for Ferris State University. We have identified that additional information is needed to proceed with your request.

In preparation of your response, please review the NRC guidance in NUREG 1556, Volume 7, "Program-Specific Guidance About Academic, Research and Development, and Other Licenses of Limited Scope", Revision 1. The NRC guidance is available at <https://www.nrc.gov/docs/ML1806/ML18065A006.pdf>.

For use of sealed sources associated with instrument calibration and reference and the unsealed material associated with the Mo-99/Tc-99m generator, please review the requirements regarding the training and experience for an RSO as outlined in Section 8.7.1, "Radiation Safety Officer" in NUREG 1556, Volume 7, Revision 1. Specifically, please provide information demonstrating that the proposed RSO is qualified by training and experience as described in Items A and B:

- A) Please provide/describe the proposed RSO's classroom training/educational background in the topics as listed below. Please include the location and dates of training. You may also discuss the topics covered in the RSO course taken in October 2020. The training must include the following topics:
- 1) characteristics of ionizing radiation/radiation physics;
  - 2) radiation protection principles;
  - 3) units of radiation dose and quantities;
  - 4) biological hazards of exposure to radiation (appropriate to types and forms of material to be used);
  - 5) radiation detection and measurement instrumentation/mathematics associated with instrumentation;
  - 6) NRC regulatory requirements and standards commensurate with the uses authorized in the license.

B) Please describe the proposed RSO's hands-on experience with the use of sealed and unsealed radioactive material including the elements listed below. Please include the location and dates of training. You may also include any hands-on experience received during the RSO course taken in October 2020. The hands-on experience must include the following:

- 1) planning and conducting radiation surveys and measurements that the licensee's radiation safety program requires;
- 2) using and performing checks for proper operation of instruments used to determine activities/calibration and reference;
- 3) security and control of licensed materials;
- 4) monitoring inventory of materials possessed under the license;
- 5) maintaining records of receipts, transfers, and disposal of licensed materials and providing required reports;
- 6) storage, handling, disposal, and documentation of radioactive waste materials;
- 7) planning, conducting, and documenting audits and other evaluations of the radiation safety program;
- 8) evaluation and documentation of radiation exposures;
- 9) using procedures to prevent or minimize radioactive contamination and using proper decontamination procedures;
- 10) using emergency procedures to control unsealed radioactive material.

C) Regarding the use of portable gauges, please review the necessary training and experience for an RSO as outlined in NUREG 1556, Volume 1, Revision 2, "Program-Specific Guidance about Portable Gauge Licenses", Section 8.7.1, Radiation Safety Officer". The guidance is available at <https://www.nrc.gov/docs/ML1617/ML1617A375.pdf>.

Specifically, please provide documentation that the proposed RSO received a portable gauge manufacturer's course for users and RSOs and hands-on experience with portable gauges or equivalent course that meets the criteria in Appendix C of NUREG 1556, Volume 1, Revision 2.

D) Please provide a signed (by the current RSO) and dated letter attesting that the proposed RSO received training and hands-on experience with the use of the radioactive material as listed on NRC license no. 21-15237-01 and is qualified to function independently as an RSO on NRC license no. 21-15237-01.

E) Please provide a Delegation of Authority Letter signed by management and the proposed RSO. Appendix E of NUREG 1556, Volume 7, Revision 1 contains a sample Delegation of Authority letter.

B. McCormick

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In accordance with Title 10 of the *Code of Federal Regulations* (CFR) 2.390, a copy of this letter will be available electronically for public inspection in the NRC Public Document Room or from ADAMS, accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html>.

Sincerely,

**Magdalena R. Gryglak**  Digitally signed by Magdalena R. Gryglak  
Date: 2020.11.16 14:50:21 -06'00'

Magdalena R. Gryglak  
Health Physicist  
Materials Licensing Branch

License No. 21-15237-01  
Docket No. 030-08783

**Model Delegation of Authority for Radiation Safety Officer**

Memo To: Radiation Safety Officer  
From: Chief Executive Officer  
Subject: Delegation of Authority

You, \_\_\_\_\_, have been appointed radiation safety officer and are responsible for ensuring the safe and secure use of radiation. Your duties and responsibilities are outlined in NUREG 1556, Volume 7, Revision 1, Appendix E.

You are responsible for managing the Radiation Protection Program, identifying radiation protection problems, initiating, recommending, or providing corrective actions, verifying implementation of corrective actions, stopping unsafe activities, and ensuring compliance with regulations. You are hereby delegated the authority necessary to meet those responsibilities, including prohibiting the use of byproduct material by employees who do not meet the necessary requirements and shutting down operations, when justified, to maintain radiation safety. You are required to notify management if staff does not cooperate and does not address radiation safety issues. In addition, you are free to raise issues with the U.S. Nuclear Regulatory Commission at any time.

\_\_\_\_\_  
Title/Signature of Management Representative

\_\_\_\_\_  
Date

I accept the above responsibilities,

\_\_\_\_\_  
Title/Signature of Radiation Safety Officer

\_\_\_\_\_  
Date

**cc: Affected department heads**