

From: [Tran, Frank](#)
To: gemlickb@gdls.com
Subject: Request for additional information for NRC License No. 21-21068-01
Date: Thursday, September 17, 2020 5:13:00 PM
Attachments: [Model Delegation of Authority to RSO.docx](#)

Dear Mr. Gemlick:

This refers to the license amendment request dated September 2, 2020 for NRC License No. 21-21068-01. Based on our review, we will need the following information.

1. Please provide a copy of a memorandum of authority for the proposed Radiation Safety Officer (RSO). Attachment is a sample for your reference (in Appendix D to NUREG-1556, Volume 12, Revision 1 <https://www.nrc.gov/reading-rm/doc-collections/nuregs/staff/sr1556/v12/>).
2. A copy of the RSO training completion certificate.
3. Confirm that the RSO will be available for emergencies and can be on-site within 24–48 hours, if applicable.
4. Based on Item 2 in the “Notes” in page 4 of the letter, please provide a copy of the license, permit, or a memo in writing from the RSO delegated you to perform RSO’s duties. Typically, the RSO’s duties and responsibilities include the following:
 - Ensure that licensed material possessed by the licensee is limited to the types and quantities of licensed material listed on the license.
 - Maintain documentation that demonstrates that the dose to individual members of the public does not exceed the limit specified in Title 10 of the Code of Federal Regulations (10 CFR) 20.1301.
 - Ensure security of radioactive material, and for licensees possessing an aggregated Category 1 or Category 2 quantity of radioactive material, develop and implement a security program for radioactive material in accordance with 10 CFR Part 37.
 - Post documents as required by 10 CFR Parts 19.11 and 21.6.
 - Ensure that licensed material is transported in accordance with applicable NRC and DOT requirements.
 - Ensure that radiation exposures are as low as is reasonably achievable (ALARA).
 - Oversee all activities involving radioactive material, including monitoring and surveys of all areas in which radioactive material is possessed or possessed and used.

- Act as liaison with NRC and other regulatory authorities.
- Provide necessary information on all aspects of radiation protection to personnel at all levels of responsibility, pursuant to 10 CFR Parts 19 and 20, and any other applicable regulations.
- Oversee proper delivery, receipt, and conduct of radiation surveys for all shipments of radioactive material arriving at or leaving from the facility, as well as packaging and labeling all radioactive material leaving the facility.
- Distribute and process personnel radiation-monitoring equipment, determine the need for and evaluate bioassays, monitor personnel radiation exposure and bioassay records for trends and high exposures, notify individuals and their supervisors of radiation exposures approaching established limits, and recommend appropriate remedial action.
- Conduct training programs and otherwise instruct all personnel in the proper procedures for handling radioactive material prior to possession or possession and use, both at periodic intervals (refresher training), and as required by changes in procedures, equipment, and regulations.
- Supervise and coordinate the radioactive waste disposal program, including effluent monitoring and recordkeeping on waste storage and disposal records.
- Oversee the storage of radioactive material not in current use, including waste.
- Perform or arrange for leak tests on all sealed sources and calibration of radiation survey instruments.
- Maintain an inventory of all radionuclides possessed under the license, and limit the quantity to the amounts authorized by the license.
- Immediately terminate any unsafe condition or activity that is found to be a threat to public health and safety or property.
- Supervise decontamination and recovery operations.
- Maintain other records not specifically designated above (e.g., records of receipts; transfers; and surveys, as required by 10 CFR 30.51 and 10 CFR 20, Subpart L, "Records").
- Hold periodic meetings with and provide reports to licensee management.
- Perform periodic audits of the Radiation Safety Program to ensure that the

licensee is complying with (i) all applicable NRC regulations; (ii) the terms and conditions of the license (e.g., leak tests; inventories; possession or possession and use limited to trained, approved users); (iii) the content and implementation of the Radiation Safety Program to achieve occupational doses and doses to members of the public that are ALARA, in accordance with 10 CFR 20.1101; and (iv) the requirement that all records be properly maintained.

- Ensure that the results of audits, identification of deficiencies, and recommendations for change are documented (and maintained for at least 3 years) and provided to management for review, and ensure that prompt action is taken to correct deficiencies.
 - Ensure that the audit results and corrective actions are communicated to all personnel who possess or possess and use licensed material.
 - Ensure that all incidents, accidents, and personnel exposure to radiation in excess of ALARA or Part 20 limits are investigated and reported to NRC and other appropriate authorities, if required, within the required time limits.
 - Maintain an understanding of, and up-to-date copies of, NRC regulations, the license, and revised licensee procedures, and ensure that the license is amended whenever there are changes in licensed activities, responsible individuals, or information or commitments provided to NRC during the licensing process.
 - Develop, implement, maintain, and distribute, as appropriate, up-to-date operating, emergency, and security procedures.
5. Describe specific training and experience for the proposed user, including types, forms, and quantities of radioactive material handled, activities performed, duration of experience related to the uses authorized in Item 9 of the licenses.

Please provide the response in writing with signed cover letter by October 12, 2020. The response can be faxed to 630-515-1078 or emailed as a pdf to frank.tran@nrc.gov. To facilitate proper mail handling in our office, please reference Mail Control No. 622960 in the response.

If you have any question or need any clarification regarding the above, please contact me at 630-829-9623 or reply to this email.

Thank you.

Frank Tran

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