



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
REGION III  
2443 WARRENVILLE ROAD, SUITE 210  
LISLE, ILLINOIS 60532-4352

MAY 13 2021

Cade J. Register, M.H.P.  
Radiation Safety Officer  
The Curators of the University of Missouri  
c/o Gary Ward  
Vice Chancellor of Operations  
900 East Stadium Blvd., Suite 180  
Columbia, MO 65211

Dear Mr. Register:

Enclosed is Amendment No. 124 to your NRC Material License No. 24-00513-32 in accordance with your request.

Please review the enclosed document carefully and be sure that you understand all conditions. If there are any errors or questions, please notify the U.S. Nuclear Regulatory Commission, Region III office at (630) 829-9887 so that we can provide appropriate corrections and answers.

If you have any questions concerning this amendment please contact me at either (630) 829-9841 or (800) 522-3025, ext. 9841. My fax number is 630-515-1078. My email address is [colleen.casey@nrc.gov](mailto:colleen.casey@nrc.gov).

We noted several issues in the course of this review and offer the following to assist you in the future.

1. Your initial letter for this amendment was dated September 22, 2020, which we received and administratively processed on September 22 – 23, 2020. Your letter states that you want the change in Radiation Safety Officer for this license to be effective October 1, 2020, about a week later.

In the future, please submit amendment requests with greater lead time for review, whenever possible. Your assistance is greatly appreciated.

2. Your initial letter included resumes for Mr. Register and Dr. Wilson, at that time your proposed Associate Radiation Safety Officer. These documents included a great deal of non-relevant and non-specific information that we strongly discourage in our guidance.

The initial letter also relied heavily on the work Mr. Register and Dr. Wilson performed at three different Agreement State (AS) licensees. None of these three AS licenses were included in the initial letter. NRC has never had access to AS licenses. In the future, when AS licenses are relied upon for credentials, qualifications and preceptor verifications, etc., please always submit a complete, signed and dated, unredacted copy of the AS license involved.

The enclosed document contains sensitive security-related information.  
When separated from this cover letter this letter is uncontrolled.

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3. In the future, please use all of the guidance pertaining to your licensed program and especially please read and use the detailed information in the appropriate sections in the front of each document. For example, for RSO changes, please use NUREG 1556 Vol. 1, Rev. 2; Vol. 7, Rev. 1; Vol. 9, Rev. 3; and Vol. 11, Rev. 1.

In particular, note that NUREG 1556 Vol. 11, Rev.1 addresses the broad scope elements of your license, which make the RSO change process more challenging than changing the RSO for a limited scope license.

Please review section 8.7.3 in NUREG 1556 Vol. 11, Rev.1 and Appendix D. This section will also refer you to Chapters 3 and 4 in NUREG 1516, "Management of Radioactive Material Safety Programs at Medical Facilities." Although this document was published prior to the more recent revisions of 10 CFR Part 35, it contains a great deal of information that is relevant independent of Part 35. Appendices I and J in NUREG 1516 are also recommended.

Section 8.7.1 in NUREG 1556, Vol. 11, Rev.1 and Chapter 1 in NUREG 1516 are also recommended for their discussions of Executive Management's role for broad scope licenses.

NUREG 1516 can be found at : <https://www.nrc.gov/reading-rm/doc-collections/nuregs/staff/sr1516/index.html> on our public website. All NUREG 1556 volumes are also readily available on our public website.

4. In addition, please be reminded that 10 CFR 30.9(a) requires: "(a) Information provided to the Commission by an applicant for a license or by a licensee or information required by statute or by the Commission's regulations, orders, or license conditions to be maintained by the applicant or the licensee shall be complete and accurate in all material respects."

NRC's Regulatory Issue Summary (RIS) 2005-31 provides criteria to identify security-related sensitive information and guidance for handling and marking of such documents. This ensures that potentially sensitive information is not made publicly available through ADAMS, the NRC's electronic document system.

Pursuant to NRC's RIS 2005-31 and in accordance with 10 CFR 2.390, the enclosed license is exempt from public disclosure because its disclosure to unauthorized individuals could present a security vulnerability.

The RIS may be located on the NRC Web site at: <http://www.nrc.gov/reading-rm/doc-collections/gen-comm/reg-issues/2005/ri200531.pdf> and the link for frequently asked questions regarding protection of security related sensitive information may be located at: <http://www.nrc.gov/reading-rm/sensitive-info/faq.html>.

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A copy of this letter will be available electronically for public inspection in the NRC Public Document Room or from the Publicly Available Records (PARS) component of NRC's document system (ADAMS).

The NRC's document system is accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html> (the Public Electronic Reading Room).

You will be periodically inspected by NRC. Failure to conduct your program in accordance with NRC regulations, license conditions, and representations made in your license application and supplemental correspondence with NRC will result in enforcement action against you.

This could include issuance of a notice of violation, or imposition of a civil penalty, or an order suspending, modifying or revoking your license as specified in the General Statement of Policy and Procedure for NRC Enforcement Actions.

Since serious consequences to employees and the public can result from failure to comply with NRC requirements, prompt and vigorous enforcement action will be taken when dealing with licensees who do not achieve the necessary meticulous attention to detail and the high standard of compliance which NRC expects of its licensees.

The NRC's Safety Culture Policy Statement became effective in June 2011. While a policy statement and not a regulation, it sets forth the agency's *expectations* for individuals and organizations to establish and maintain a positive safety culture.

You can access the policy statement and supporting material that may benefit your organization on NRC's safety culture Web site at <http://www.nrc.gov/about-nrc/regulatory/enforcement/safety-culture.html>.

We strongly encourage you to review this material and adapt it to your particular needs in order to develop and maintain a positive safety culture as you engage in NRC-regulated activities.

If there are any errors or questions, please notify the U.S. Nuclear Regulatory Commission, Region III office at (630) 829-9807 so that we can provide appropriate corrections and answers.

You may also contact me at (630) 829-9841. My fax number is (630) 515-1078 and my email address is [colleen.casey@nrc.gov](mailto:colleen.casey@nrc.gov).

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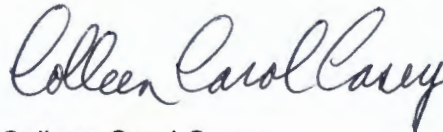
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Sincerely,



Colleen Carol Casey  
Materials Licensing Branch

License No. 24-00513-32  
Docket No. 030-02278

Enclosure:

Amendment No. 124