

**From:** [Cender, Laura](#)  
**To:** [wallenj@rsscott.com](mailto:wallenj@rsscott.com)  
**Cc:** "[Glen Smolinski](#)"; "[Scott](#)"; [ryersond@rsscott.com](mailto:ryersond@rsscott.com)  
**Subject:** RE: RE: Acknowledgement - Amendment Request for License No. 21-18504-01  
**Date:** Wednesday, June 02, 2021 4:14:00 PM  
**Attachments:** [NUREG 1556 Vol.1 Rev. 2 Appendix C.pdf](#)  
[Model Delegation of Authority to Radiation Safety Officer.docx](#)

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Hello Mr. Wallen,

Thank you for reaching out regarding your pending NRC license amendment request. I have reviewed the information submitted, and additional information is required regarding the requested change to the Radiation Safety Officer. To name a new Radiation Safety Officer on the license please submit the following supporting items.

1. Training records or certificates for Mr. Pawloski demonstrating completion of basic radiation safety training and hands on experience using nuclear moisture density gauges, per the attached guidance in NUREG 1556 Vol. 1 Rev. 2 Appendix C.
2. Provide a completed copy of the attached Delegation of Authority Memo. Please ensure that the names and titles of the individuals signing the form are typed beneath their respective signature lines. The memo is to be signed by both Mr. Pawloski and someone in his senior management chain.

Please ensure that your response includes a signed and dated cover letter. I can be reached via email or at 630-829-9712 with any questions.

Thank you,  
Laura Cender

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**From:** Tomczak, Tammy <[Tammy.Tomczak@nrc.gov](mailto:Tammy.Tomczak@nrc.gov)>  
**Sent:** Wednesday, June 02, 2021 9:22 AM  
**To:** [wallenj@rsscott.com](mailto:wallenj@rsscott.com)  
**Cc:** 'Glen Smolinski' <[smolinskig2@rsscott.com](mailto:smolinskig2@rsscott.com)>; 'Scott' <[pawloskis@rsscott.com](mailto:pawloskis@rsscott.com)>; [ryersond@rsscott.com](mailto:ryersond@rsscott.com); Cender, Laura <[Laura.Cender@nrc.gov](mailto:Laura.Cender@nrc.gov)>  
**Subject:** RE: RE: Acknowledgement - Amendment Request for License No. 21-18504-01

Good morning, Mr. Wallen,

Laura Cender is the technical reviewer assigned to your case. I have included her on this email.

Thank you,  
Tammy

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**From:** [wallenj@rsscott.com](mailto:wallenj@rsscott.com) <[wallenj@rsscott.com](mailto:wallenj@rsscott.com)>  
**Sent:** Tuesday, June 01, 2021 3:27 PM  
**To:** Tomczak, Tammy <[Tammy.Tomczak@nrc.gov](mailto:Tammy.Tomczak@nrc.gov)>

**Cc:** 'Glen Smolinski' <[smolinskig2@rsscott.com](mailto:smolinskig2@rsscott.com)>; 'Scott' <[pawloskis@rsscott.com](mailto:pawloskis@rsscott.com)>;  
[ryersond@rsscott.com](mailto:ryersond@rsscott.com)

**Subject:** [External\_Sender] RE: Acknowledgement - Amendment Request for License No. 21-18504-01

Tammy,

I was wondering the status of our License Amendment Request.

Thanks

Jim

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**From:** [ryersond@rsscott.com](mailto:ryersond@rsscott.com) <[ryersond@rsscott.com](mailto:ryersond@rsscott.com)>

**Sent:** Wednesday, April 28, 2021 9:54 AM

**To:** Jim Wallen <[wallej@rsscott.com](mailto:wallej@rsscott.com)>

**Cc:** Glen Smolinski <[smolinskig2@rsscott.com](mailto:smolinskig2@rsscott.com)>; Scott <[pawloskis@rsscott.com](mailto:pawloskis@rsscott.com)>

**Subject:** FW: Acknowledgement - Amendment Request for License No. 21-18504-01

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**From:** Tomczak, Tammy <[Tammy.Tomczak@nrc.gov](mailto:Tammy.Tomczak@nrc.gov)>

**Sent:** Wednesday, April 28, 2021 9:43 AM

**To:** [ryersond@rsscott.com](mailto:ryersond@rsscott.com)

**Cc:** [pawloskis@rsscott.com](mailto:pawloskis@rsscott.com)

**Subject:** Acknowledgement - Amendment Request for License No. 21-18504-01

Good morning, Mr. Ryerson,

Due to current mandatory telework status of the NRC, I am electronically transmitting the acknowledgement form that you would normally receive in the mail.

Please let me know if you have any questions, or require any additional information.

Thank you,

Tammy Tomczak  
Licensing Assistant  
630-829-9564



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## **APPENDIX C**

### **CRITERIA FOR ACCEPTABLE TRAINING COURSES FOR PORTABLE GAUGE USERS**

## **Criteria for Acceptable Training Courses for Portable Gauge Users**

### **Course Content**

Acceptable course content for training courses for portable gauge users includes the following:

- 1.5 to 2 hours of radiation safety and regulatory requirements, emphasizing practical subjects important to safe use of the gauge; radiation versus contamination; internal versus external exposure; concepts of time, distance, and shielding to minimize exposure; control and surveillance of gauges; location of the sealed source within the portable gauge; inventory; recordkeeping; incidents; licensing and inspection by the regulatory agency; need for complete and accurate information; employee protection; and deliberate misconduct
- 1.5 to 2 hours of practical training, to include portable gauge theory, operating procedures, emergency procedures, security, maintenance, and transportation procedures; and field training emphasizing radiation safety, including dry runs of setting up and making measurements with the gauge, controlling and maintaining surveillance over the portable gauge, performing routine cleaning and lubrication, packaging and transporting the gauge, storing the gauge, and following emergency and security procedures

### **Course Examination**

Prospective gauge users participating in training courses should achieve at least a 70-percent score on a 25- to 50-question written test. The test should include the following:

- an emphasis on radiation safety of portable gauge storage, security of gauges while on jobsites, use, sealed source location, maintenance, and transportation, rather than the theory and art of making portable gauge measurements
- review of correct answers to missed questions with the prospective gauge user following the scoring of the test

### **Instructor Training and Experience**

Instructors should have, at a minimum, the following:

- successful completion of a portable gauge user course
- successful completion of an 8-hour radiation safety course or radiation safety officer-training course
- documentation of 8 hours of hands-on experience with portable gauges

**Notes:**

- Licensees must maintain records of training for 3 years following the last use of licensed material by the authorized user.
- Initial and recurrent (every 3 years) U.S. Department of Transportation hazardous material (HAZMAT) training is also required for all gauge users that transport gauges (see Section 8.10.9, "Transportation").

**Online Courses**

Online training for portable gauge users is acceptable. The online training topics should follow the suggested Course Content on the previous page. Any online training should be supplemented by the practical hands-on training also described under Course Content. The applicant/licensee should demonstrate how it will meet the training described under Course Content and may consider providing a copy of the curricula covered in the course.

Online training courses should also include an examination described under Course Examination.

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

Memo To: Radiation Safety Officer

From: Management Representative

Subject: Delegation of Authority

You, \_\_\_\_\_, have been appointed radiation safety officer and are responsible for ensuring the safe use of radiation. 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. It is estimated that you will spend \_\_\_\_\_ hours per week conducting radiation protection activities.

\_\_\_\_\_  
Signature of Management Representative (Name)  
*Manager Title*

\_\_\_\_\_  
Date

I accept the above responsibilities,

\_\_\_\_\_  
Signature of Radiation Safety Officer

\_\_\_\_\_  
Date

cc: Affected department heads