

From: [Ullrich, Betsy](#)
To: [Ron Gagnon - NOAA Federal](#); reid.osborne@noaa.gov; maria.delorenzo@noaa.gov
Subject: Please confirm my understanding of the status of your response to the August 2, 2021 Request for Additional Information
Date: Friday, October 22, 2021 8:03:00 AM

All,

Following the inspection by Orysia Masnyck-Bailey, I had a telephone discussion with Reid Osborne. My understanding at that time was that I would receive a response that submitted both the experience of the proposed RSO in performing RSO activities, and the authorized user training and experience with the types of materials authorized by your license. Since that time, Orysia informed me that she was told the response was already submitted. I have not received any response yet, to the best of my knowledge. If you submitted a response, please let me know when, and how it was sent, so I can track it down.

I do note that both Ron Gagnon and Reid Osborne have taken the 40-hour training course for an RSO. We also usually require some experience in performing the duties of an RSO. We would usually make the RSO an authorized user, because the RSO often is required to perform activities with licensed materials as part of the RSO job. In the case of your license, the July 8, 2009 letter states the RSO duties as follows:

4. RADIATION SAFETY OFFICER RESPONSIBILITIES

- 4.1 Provide users with copies of the radiation safety manual and copies of all pertinent record keeping forms.
- 4.2 Review on the basis of radiation safety and approve all requests for licensed materials or radiation devices.
- 4.3 Receive, catalogue, and survey all procured licensed material.
- 4.4 Provide a means of radioactive waste disposal for all laboratory users.
- 4.5 Train new users in the basics of radiation safety and laboratory practices.
- 4.6 Act as CCEHBR and HML representative with the NRC in issues of license renewal, amendments and inspections.

11.1 Waste Disposal Procedures

1. All waste must be collected by the RSO or designate. **No radioactive materials shall be disposed of directly into the sewage system or non-radioactive trash.**

2. The RSO will collect all waste upon request of the users. The RSO will arrange for waste pick-up and disposal by a commercial contractor. The RSO will pack waste in accordance with waste contractor guidelines.

There are other responsibilities listed elsewhere in that application. If the RSO is to receive and survey all licensed material, and train new users on laboratory radiation safety practices, and pack waste, then the RSO should have some experience doing those activities. It does not appear that Ron Gagnon has experience performing these activities. He can still be named RSO, but would be prohibited from handling licensed materials unless under the supervision of an authorized user; and you would need to provide information to amend the license to name the individual(s) who would perform these activities currently assigned to your RSO.

As for the authorized users, in order to add either Ron Gagnon or Reid Osborne as an authorized user, I need information regarding their experience actually using licensed materials that are authorized [or similar to those authorized] on your current license. Most of the radionuclides are low or medium energy beta-emitters, and surveys, shielding and handling of these materials is different than that for alpha, high-energy beta, or gamma emitters. We normally require information about the proposed authorized user's experience with types, quantities and forms of licensed materials handled; the duration of that experience; and where that experience was gained.

If we need a conference call to sort this out, that is fine with me. I am normally required to complete these actions in 90 days, but at this time, the action is well over that metric. We are not closing this action because a new RSO needs to be named, and that needs to be done as soon as possible.

Please let me know what the status is of a response to the August 2 RAI.

Thank you very much,
Betsy Ullrich

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