



**UNITED STATES  
NUCLEAR REGULATORY COMMISSION**

REGION III  
2443 WARRENVILLE RD. SUITE 210  
LISLE, IL 60532-4352

August 1, 2022

Michael Lewandowski, Manager  
Corporate Radiation Safety Officer  
3M Company  
Corporate Radiation Protection & Compliance  
3M Center, Building 0224-06-W-28  
P.O. Box 33283  
St. Paul, MN 55133-3283

Dear Mr. Lewandowski:

Enclosed is Amendment No. 58 to your NRC Material License No. 22-00057-61 in accordance with your request.

This amendment removes Michael Rust as the Radiation Safety Officer (RSO), authorizes Jessica M. Goerdt as the Radiation Safety Officer and names Mr. Rust as an Alternate RSO.

This also refers to the letter dated May 3, 2022, signed by Scott Huneycutt, Senior Health Physicist, of your staff. This letter requested the addition of Ms. Goerdt as the RSO but was incomplete in a few relatively minor respects that we still need to resolve.

We did not receive an updated organizational chart and description for management oversight of the irradiation in accordance with 10 CFR 36.13(d).

We also did not receive Ms. Goerdt's email address, direct telephone number and fax number for our records.

For Mr. Rust, we did not receive a "Delegation of Authority (DoA)" for his new position as one of two Alternate RSOs on this license. Your DoA for him must specify that he will act as RSO only in the physical absence of the RSO and that only he or Mr. Kelly Kantack may serve in their capacity as Alternate RSO at a time.

We also noted that "recognizing and ensuring that radiation warning signs are visible and legible," as listed in NUREG 1556 Vol. 6, Rev. 1, Appendix E, page E-2, was not described in any of the training and experience documents submitted in support of Ms. Goerdt's application to become the RSO.

The more clearly and explicitly you correlate the details of a proposed RSO's training and experience documentation with NUREG 1556 Vol. 6, Rev. 1, the better, as this is what we must evaluate your request against.

Within 30 days of the date of this letter (by September 2, 2022) please provide the above information, DoA, organization chart/description, commitment for warning signage, Ms. Goerdt's direct phone number, email address and fax number, to us in a written amendment request, to my attention, as "additional information to control number 630866."

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

Please only send us one complete, written, currently dated and legibly, physically signed (by an appropriate senior management official) correspondence document, such as either an NRC Form 313 or a business-style letter containing the same information as an NRC Form 313a.

Please ensure that the requested information is answered completely and accurately.

Please do not send multiple copies of responses and please do not submit any information that is identical to what you have already sent us. If you resubmit such information for the sake of adding context and other details to enhance its meaning, that is acceptable.

Please do not email a PDF document to me, and transmit a faxed version, and/or a hard copy sent by mail. Only one copy transmitted in only one of these ways is appropriate to prevent administrative processing errors, although emailing a PDF document to "R3DNMSMAIL.Resource@nrc.gov" is the most efficient mechanism. You may "cc" me on that email.

If you wish to have a telephone discussion of the above, arranging the call by email is preferable. My email address is [colleen.casey@nrc.gov](mailto:colleen.casey@nrc.gov). My telephone number is (630) 829-9841. I telework about half the time so reaching me via email is most efficient.

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."

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 (630) 829-9841. My fax number is (630) 515-1078. My email address is [colleen.casey@nrc.gov](mailto:colleen.casey@nrc.gov).

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 document 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>.

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.

Sincerely,

**Colleen C. Casey** Digitally signed by Colleen C. Casey  
Date: 2022.08.01 17:59:01 -05'00'

Colleen Carol Casey  
Health Physicist  
Materials Licensing Branch

License No. 22-00057-61  
Docket No. 030-14999

Enclosure:

Amendment No. 58