

From: [Frank Tran](#)
To: rpollard@nisource.com
Subject: Request for additional information for NRC License No. 13-14984-01
Date: Tuesday, November 1, 2022 8:49:00 AM
Attachments: [Sample - Delegation of Authority to RSO.docx](#)

Dear Mr. Pollard:

We have reviewed your amendment request dated September 28, 2022 for NRC License No. 13-14984-01. Specifically, you request to name Kayla Tracy as a new Radiation Safety Officer (RSO) and Daniel J. Vidt as the backup RSO.

Title 10 of the Code of Federal Regulations (10 CFR) 30.33(a)(3) requires the applicant to be qualified by training and experience to use the material for the purpose requested in such manner as to protect health and minimize danger to life or property. The NRC licensing guidance in NUREG-1556, Volume 4, Revision 1, "Consolidated Guidance About Materials Licenses: Program-Specific Guidance About Fixed Gauge Licenses", provides the criteria for training and experience for the RSO and users. The company provided training for Kayla Tracy and Daniel J. Vidt is not a fixed gauge manufacturer or vendor; therefore, we will need additional information.

Based on the information you provided, Kayla Tracy and Daniel J. Vidt may have worked with your licensed material (fixed gauge). If they have been the users, please provide a copy of the training record approved in writing by the RSO as indicated in Condition 12 listed in your license.

Your license is authorized for some nonroutine maintenances, including fixed gauge installation, relocation, removal from services, and initial radiation surveys. These activities are currently performed only by Wade Murphy or under other authorized licenses. You request authorization for Kayla Tracy and Daniel J. Vidt to perform the nonroutine maintenances above. Based on Appendix J, "Information Needed to Support Applicant's Request to Perform Nonroutine Operations", in NUREG-1556, Vol. 4, Rev. 1, the acceptable training may be a training course for nonroutine operations provided by the manufacturers/distributors or equivalent. Based on the training certificate and agenda provided, we determined the information is insufficient. If Kayla Tracy and Daniel J. Vidt had been trained by and performed the nonroutine operations above under the supervision of Wade Murphy, please provide the training record with confirmation from Mr. Murphy. If not, please provide the information for Kayla Tracy and Daniel J. Vidt as discussed in Appendix J.

In addition, please provide a copy of the delegation of authority for the proposed RSO (a sample in NUREG-1556, Vol. 4, Rev. 1 is attached for your reference) and contact information for the proposed RSO, Kayla Tracy (e.g., work phone, work email, etc.)

For your information, the NRC licensing guidance recommends to name only one RSO in the license. The RSO is the person responsible for the licensee's radiation protection program. The responsibilities of the RSO may not be transferred to other individuals. Many tasks and duties associated with managing the program may be assigned or delegated to other qualified individuals; however, the responsibility for these tasks and duties remains with the RSO. The NRC recognizes that a qualified individual will on occasion fill in for the RSO when the RSO is away for short periods of time (e.g., professional conferences,

vacation, illness). Absences that have a major impact on licensed activities should not occur for extended or indefinite periods of time. Consideration should be given to how individuals temporarily delegated the duties and tasks of the absent RSO could contact the RSO in the event of an emergency. You could establish Assistant RSOs, as needed, in your company.

To continue the review of your application, we request that you submit your response under a dated and signed cover letter by December 1, 2022. In the cover letter, please refer the license number, docket number and Mail Control No. 632651.

If you have questions, require additional time to respond, or require clarification on any of the information stated above, please contact me at 630-829-9623 or reply to this email.

In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice," a copy of this correspondence will be made available electronically for public inspection in the NRC Public Document Room or from the NRC's Agencywide Documents Access and Management System (ADAMS), accessible from the NRC Web site at <https://www.nrc.gov/reading-rm/adams.html>.

Sincerely,

Frank Tran

Health Physicist/License Reviewer

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References:

NRC Regulations: <https://www.nrc.gov/reading-rm/doc-collections/cfr/index.html>

NUREG-1556 Series: <https://www.nrc.gov/reading-rm/doc-collections/nuregs/staff/sr1556/index.html>