

**UNITED STATES
NUCLEAR REGULATORY COMMISSION**

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



December 11, 2023

Michael G. Wiese
Radiation Safety Officer
Universal Medical Resources, Inc.
207 Lange Dr.
Washington, MO 63090

Dear Mr. Wiese:

This refers to the application dated September 15, 2023, requesting a change in the Radiation Safety Officer (RSO) on your NRC license No. 24-32189-01 from you to Kelvin Lebish. You also requested the addition of Castin Woolley as an Alternate RSO and you requested that both Mr. Lebish and Mr. Woolley be named authorized users. Upon approval of these changes, you wanted to be removed as an authorized user and RSO for this license.

We are unable to complete our review because the information in the letter is insufficient to support your request.

Within 15 calendar days of the date of this letter (by close of business on December 26, 2023) please provide only one complete, written, currently dated and signed response to the items below.

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 only one correspondence letter is used that shows both the date and the signature of the senior management official, in contrast to the two separate, incomplete correspondence letters initiating this request.

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 unless we direct you to do so. 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 is the least efficient mechanism for responding to me.

The most reliable and fastest way to respond is to send an email to R3-DRSSMail.Resource@nrc.gov and "cc" me at colleen.casey@nrc.gov.

1. We noted that your application dated September 15, 2023, and supporting documents are silent with respect to training and hands-on experience using unsealed licensed materials for the proposed RSO and alternate RSO.

Your license authorizes significant quantities of liquid gamma-emitting radioactive materials, in addition to several types of sealed sources.

Please specify and describe the training and hands-on experience that Mr. Lebish and Mr. Woolley have received using unsealed radioactive materials, including, but not limited to, safe handling practices, use of remote handling tools, contamination prevention practices, survey procedures, use of dosimetry equipment, and emergency procedures, i.e., a spill.

Please include the dates and/or timeframes when each proposed individual received this training and experience.

2. The commitment made in your application, that Mr. Woolley will only assume the RSO duties in the event that the designated RSO is unable to perform these duties, is insufficient.

In order for us to consider adding an alternate RSO to your license, you must explicitly state that the alternate RSO, Mr. Woolley, will only act as RSO in the physical absence of the RSO, Mr. Lebish. Please state this in your written response.

3. The organization chart included with your application was illegible. Please submit a copy that is legible showing the relationship and reporting path between the RSO and senior management.

Please be reminded of 10 CFR 30.9 (a) "Completeness and accuracy of information" requires, in part, that: "(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 regulation, orders, or license condition to be maintained by the applicant or the licensee shall be complete and accurate in all material respects.

If you have any questions concerning this please contact me at colleen.casey@nrc.gov. My fax number is 630-515-1078. My office phone number is (630) 829-9841 but I telework much of the time so reaching me via email is more efficient and reliable.

In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice," a copy of this letter will be 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>.

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) 829-9807 so that we can provide appropriate corrections and answers.

M. Wiese

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In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice," a copy of this letter and its enclosure will be 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 <http://www.nrc.gov/reading-rm/adams.html>.

Sincerely,

Colleen Carol Casey
Health Physicist
Materials Licensing Branch

License No. 24-32189-01
Docket No. 030-35121
Control No.: 637137