

**From:** [Jason Kelly](#)  
**To:** [ckoepp@marathonpetroleum.com](mailto:ckoepp@marathonpetroleum.com)  
**Cc:** [pjscanlon@marathonpetroleum.com](mailto:pjscanlon@marathonpetroleum.com)  
**Subject:** U.S. NRC Materials License #21-32842-01 - Request for Additional Information  
**Date:** Tuesday, April 9, 2024 11:02:00 AM  
**Attachments:** [Delegation of Authority - Fillable Form.pdf](#)

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Mr. Koepp:

I have reviewed your request dated March 22, 2024, for an amendment to your U.S. Nuclear Regulatory Commission (NRC) Materials License No. 21-32842-01.

The U.S. NRC's guidance document for your category of license is NUREG-1556, Volume 4, Rev. 1, dated July 2016, "Consolidated Guidance About Materials Licenses, Program-Specific Guidance About Fixed Gauge Licenses," which I refer to below as "the guidance," is available on the U.S. NRC website at: <https://www.nrc.gov/docs/ML1618/ML16188A048.pdf>

Upon review of your request, I identified the following area in which additional or clarifying information is needed:

Section 8.7.1, "Radiation Safety Officer," of the guidance, identifies that the Radiation Safety Officer (RSO) is responsible for the oversight of licensed operations. The RSO must have sufficient organizational authority and management prerogative to enforce appropriate radiation protection rules, standards, and practices.

Please resubmit the request bearing the signature of a management representative. Further, I recommend that you also obtain and maintain on file a signed Delegation of Authority supporting the appointment. The attached model Delegation of Authority is also available in Appendix C, "Typical Duties and Responsibilities of the Radiation Safety Officer," of the guidance.

Please provide a written response to this request within 15 calendar days that is signed by a management representative. To ensure proper routing, please include a reference to your company's U.S. NRC Materials License No. 21-32842-01 along with Control No. 640109. Once you are ready to submit the response, you may forward it to me via e-mail. If you do not receive a prompt acknowledgement of receipt, you are also welcome to send a confirming hardcopy by U.S. Mail to the address in my signature block below.

As you will not receive a hardcopy of this request, please respond to this e-mail verifying that you have received it and were able to access the attachment.

Please contact me at (630) 829-9737 or [Jason.Kelly@nrc.gov](mailto:Jason.Kelly@nrc.gov) if you have any questions or if you need additional time to respond to this request.

**Jason M. Kelly, MPH, CPH**  
**Health Physicist**  
**Materials Licensing Branch**

**U.S. Nuclear Regulatory Commission**

**Region III**

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**<http://www.nrc.gov/>**

## Model Delegation of Authority to Radiation Safety Officer

Memo To: Radiation Safety Officer

From: Chief Executive Officer

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

\_\_\_\_\_  
Date

I accept the above responsibilities,

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

\_\_\_\_\_  
Date

cc: Affected department heads