

From: [Frank Tran](#)
To: [Joseph Koch](#)
Cc: jwdix@doerun.com
Subject: Request additional information for NRC Materials License No. 24-24815-01
Date: Friday, April 26, 2024 3:16:00 PM
Attachments: [Sample - Delegation of Authority to RSO.docx](#)

Dear Dr. Koch:

This refers to the license renewal application dated April 5, 2024, for NRC License No. 24-24815-01 for The Doe Run Company. It appears your application was prepared using an outdated NRC licensing guidance NUREG-1556, Vol. 4 dated 1998. We reviewed the application in accordance with the licensing guidance in NUREG-1556, Volume 4, Rev. 1 (dated July 2016) and Volume 20, Rev. 1 (dated November 2020). Based on the NRC policy, a materials license will be renewed in its entirety. Accordingly, we will need the following.

1. We could not locate the Sealed Source and Device Registry (SSDR) certificate for VEGA Model Vegasource 82. Please provide a copy of the SSDR certificate for it.
2. Based on our record, the licensee has possessed two Thermo Process Instruments, L.P. Model 5203. However, the application identified only one. Provide the record of transfer or disposal including the transferring receipt and the last leak test certificate for the other.
3. Provide a copy of the delegation of authority for the Radiation Safety Officer (RSO). A sample of the delegation of authority for RSO can be found in Appendix C of NUREG-1556, Vol. 4, Rev. 1. A copy is attached for your reference.
4. The licensee provides Justin Dix as an Alternate RSO; however, NRC regulations and guidance don't recognize Alternate RSO. We are aware that you are a Health Physics Consultant for the licensee and Justin Dix will assist you with RSO's tasks onsite. Therefore, we will continue to list Justin Dix as an Assistant RSO on the license. Please note that, 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.
5. Regarding the authorized users for your radiation safety program, the NRC policy is not to review the qualification of the proposed users during the licensing phase. The intent will give the applicant/licensee the flexibility to add and remove the users based on its needs. Per Section 7.2., Authorized users, in NUREG-1556, Vol. 4, Rev. 1, provide the following statement: "Before using licensed materials, authorized users will have successfully completed one of the training courses described in the "Criteria" part of the section titled, "Authorized Users" in NUREG-1556, Volume 4, Revision 1, "Consolidated Guidance About Materials Licenses: Program-Specific Guidance About Fixed Gauge Licenses."
6. Section Occupational Dosimetry in the application did not address the record maintaining and the processing of dosimeters. Per Section 8.10.4, Occupational Dose, in NUREG-1556, Vol. 4,

Rev. 1, provide the following statement: “We will maintain, for inspection by the NRC, documentation demonstrating that unmonitored individuals are not likely to receive a radiation dose in excess of the limits in 10 CFR 20.1502(a). Or, we will provide and require the use of individual monitoring devices (dosimetry). All personnel dosimeters that require processing to determine the radiation dose will be processed and evaluated by a NVLAP-approved processor.”

7. Section Operating & Emergency Procedure of your application did not address the procedures related to the security of licensed material. Per Section 8.10.6, Operating, Emergency, and Security Procedures, of NUREG-1556, Vol. 4, Rev. 1, provide the following statement: “Operating, emergency, and security procedures will be developed, implemented, maintained, and distributed and will meet the criteria in Section 8.10.6, “Operating, Emergency, and Security Procedures,” in NUREG-1556, Volume 4, Revision 1.”
8. Section Leak Test in your application did not address the record keeping for leak tests. Please provide a statement that the licensee will maintain records of sealed source leak tests.
9. The current license authorizes the licensee to perform certain non-routine maintenance activities; however, it appears the licensee is no longer performing the activities. In the application, the licensee stated that it will use a licensed company for any non-routine maintenance. Per Section 8.10.8, Maintenance, of NUREG-1556, Vol. 4, Rev. 1, provide the following statement: “The gauge manufacturer, distributor, or other person authorized by the NRC or an Agreement State will perform nonroutine operations such as installation, initial radiation survey, repair and maintenance of radiological safety components, relocation, replacement, alignment, removal from service, and disposal of sealed sources.”

To continue the review of the application, we request that you submit your response under a dated and signed cover letter by May 24, 2024. In the cover letter, please reference the license number and Mail Control No. 640283. 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 Title 10 of the *Code of Federal Regulations* (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>.

Best regards,

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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>

NUREG-1757 Series: <https://www.nrc.gov/reading-rm/doc-collections/nuregs/staff/sr1757/index.html>

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

NRC License Fees: <https://www.nrc.gov/about-nrc/regulatory/licensing/fees.html>

Materials Licensees Toolkits: <https://www.nrc.gov/materials/miau/mat-toolkits.html>