



State of Utah

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Department of
Environmental Quality

Amanda Smith
Executive Director

DIVISION OF RADIATION CONTROL
Rusty Lundberg
Director



February 21, 2013

Mr. Sean McCandless, Director of Compliance and Permitting
EnergySolutions, LLC
423 West 300 South, Suite 200
Salt Lake City, UT 84101

DRC - 2013_001384

SUBJECT: Radioactive Material Licenses UT 2300249 and UT 2300478: Appendix I
Organization dated February 4, 2013: Request for Information

Dear Mr. McCandless:

EnergySolutions submitted to the Division of Radiation Control (DRC) a revision of Appendix I *Organization* (CD12-0275) on October 24, 2012. The DRC was in the process of reviewing that submittal when EnergySolutions went through a workforce reduction. EnergySolutions informed the DRC that Appendix I was being modified again and would be resubmitted. EnergySolutions in a letter dated February 4, 2013 (CD13-0033) submitted a revised Appendix I *Organization*, which documents the changes to job titles, responsibilities and required qualifications after the two workforce reductions. Information that was requested and submitted during the review of the October 24, 2013 submittal is considered as part of this review.

After reviewing the February 4, 2013 submittal the DRC requests the following information:

1. In section I2 *Qualifications* there are several positions listed that require a Bachelor's degree or equivalent experience. How much work experience is considered equivalent experience to a Bachelor's degree? How is that experience documented?

The following are the positions where a Bachelor's degree is required but equivalent work experience can be substituted and the amount of experience was not indicated:

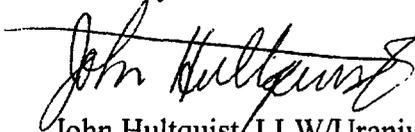
- Director, Corporate QA
 - Quality Assurance Manager
 - Construction Quality Assurance Manager
 - Manager, Compliance and Permitting
 - Environmental Manager
2. In section I2 *Qualifications* under *Lead, Laboratory* it states "The Lead, Laboratory Manager must have a bachelor's degree in chemistry or a related field, or at least two

years' experience in the nuclear field." Justify how two years' experience in the nuclear field is equivalent to a four year bachelor's degree. Also specify the type of experience in the nuclear field.

3. In section I2 *Qualifications* under *Lead, Health Physics ASRSO* it states "The lead must have a bachelor's degree, preferably in health physics, or equivalent training and experience which includes at least four years' experience in a radioactive material field," This description is a little unclear, Explain what types of Bachelor's degree besides Health Physics are acceptable. Clarify the "or equivalent training and experience" phrase on how much and what kind of experience and training equals a Bachelor's degree.
4. Is the *Lead, Health Physics ASRSO* position the designate position for the *Manager, Health Physics and Safety (RSO)* position? In Radioactive Materials License (RML) UT 2300478 License Conditions 9.10 and 12.3 states that the DHP (now RSO) or designate need to qualify by way of specialized training in accordance to NRC Regulatory Guide 8.31 sections 1.2 and 2.4. The DRC has determined that the DHP (RSO) designate(s) need to have the same training and experienced as the DHP (RSO) as defined in NRC Regulatory Guide 8.31 section 2.4. This includes the 4 weeks specialized training with a refresher training every 2 years. Also see Interrogatory statements 5.4.2(1) and 5.4.2(20) of the First Round of Interrogatories of the Energy Solutions 11e.(2) Radioactive Materials License UT2300478 Renewal Application dated January 2013.

If you have any questions, please contact me or Ryan Johnson at (801) 536-4250.

Sincerely,



John Hultquist, LLW/Uranium Mill Licensing Manager

JH/RJ:rj