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Sent: Friday, April 19, 2019 8:45 AM

To: Howe, Donna-Beth <Donna-Beth.Howe@nrc.gov>

Subject: [External_Sender] RE: RE: RE: Opportunity to review and comment on an NRC Office of Budget and Management (OMB) information collection for NRC Form 313 "Application for Materials License"

Good morning Donna-Beth,

Thank you for the clarification. I will comment on the NRC Form 313 as I have direct experience with it; sorry about my misunderstanding.

The NIST Gaithersburg materials license, SNM-362, is primarily a Part 70 license that also has aspects of a Type A Broadscope license. The number of amendments of our license is fairly infrequent. Since the last renewal in 2013, it has been amended four times, only once to request a change in possession limits. At the times that I have been involved with the amendment and use of the NRC Form 313 it has been straightforward. One of the amendments was to change RSOs as my predecessor retired in 2016. At that time NIST used some of the categories of the 313A as guidance to develop a letter of RSO qualifications along with a résumé and those documents were attached to the 313 requesting the amendment. The letter provided the following categories:

1. At a minimum, a college degree at the bachelor level or equivalent training and experience in physical, chemical, biological sciences, or engineering;
2. Training and experience commensurate with the types, forms, and quantities of radioactive material authorized on the license;
3. Training and experience sufficient to identify and control anticipated radiation hazards associated with the use, in research and development, of radioactive material authorized on the license; and
4. Experience in applying knowledge of the regulatory requirements applicable to licensed activities.

Please let me know if I can further assist with this effort of information collection.

Best regards,

Manny