



# ARM Group Inc.

Earth Resource Consultants

MS16

L-3

January 29, 1999

Mr. Eric Reber  
US NRC Region I  
475 Allendale Road  
King of Prussia, PA 19406

Mail Control No.: 126410

Dear Mr. Reber:

In accordance with your request, I am forwarding a completed copy of Appendix B of NRC Form 313, which supplies information in the suggested format. To avoid the need for modifications to our pending license, the permanent storage facility will be at our Hershey, Pennsylvania facility. No portable gauges will be stored at the Middletown, Pennsylvania facility. Please use the following address for storage location on the license:

561 W. Chocolate Avenue  
Hershey, PA 17033

Until further notice, please route all correspondence to the following address:

ARM Group, Inc.  
P.O. Box 40  
Middletown, PA 17057

If you have any further questions or need additional information, do not hesitate to contact me at (717) 948-5031

Sincerely yours,

ARM Group Inc.

Michael P. Guy

Enclosure

NMSS/RGNI MATERIALS-002

126410

29 South Union Street • P.O. Box 40 • Middletown, PA 17057-0040  
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FAX REC'D JAN 29 1999

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# **ITEMS 5 & 6: MATERIALS TO BE POSSESSED AND PROPOSED USES**

YES	NO	RADIOISOTOPE	MANUFACTURER/ MODEL NO.	QUANTITY	MOST COMMON USE	SPECIFY OTHER USES NOT LISTED ON SSD CERTIFICATE
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Cesium-137	Sealed sources in compatible gauges as specified in Sealed Source and Device Registration Sheet	Not to exceed maximum activity per source as specified in Sealed Source and Device Registration Sheet	Measure Physical Properties of Materials	<input checked="" type="checkbox"/> Not applicable [ ] Uses are:
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Americium-241	Sealed neutron sources in compatible gauges as specified in Sealed Source and Device Registration Sheet	Not to exceed maximum activity per source as specified in Sealed Source and Device Registration Sheet	Measure Physical Properties of Materials	<input checked="" type="checkbox"/> Not applicable [ ] Uses are:
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Californium-252	Sealed neutron sources in compatible gauges as specified in Sealed Source and Device Registration Sheet	Not to exceed maximum activity per source as specified in Sealed Source and Device Registration Sheet	Measure Physical Properties of Materials	<input checked="" type="checkbox"/> Not applicable [ ] Uses are:
<input type="checkbox"/>	<input type="checkbox"/>	Other (specify)				
<b><u>FINANCIAL ASSURANCE REQUIRED AND EVIDENCE OF FINANCIAL ASSURANCE PROVIDED</u></b>						

APPENDIX B

# **ITEMS 7 THROUGH 11: TRAINING AND EXPERIENCE, FACILITIES AND EQUIPMENT, RADIATION SAFETY PROGRAM, AND WASTE DISPOSAL**

ITEM NO. AND TITLE	SUGGESTED RESPONSE	YES	ALTERNATIVE PROCEDURES ATTACHED
<b>7. INDIVIDUAL(S) RESPONSIBLE FOR RADIATION SAFETY PROGRAM AND THEIR TRAINING AND EXPERIENCE - RADIATION SAFETY OFFICER</b>  Name: <u>Michael Guy</u>	<p>Before obtaining licensed materials, the proposed <i>RSO</i> will have successfully completed one of the training courses described in Criteria in the section entitled "Individual(s) Responsible for Radiation Safety Program and Their Training and Experience - Radiation Safety Officer" in NUREG-1556, Vol. 1, dated May 1997.</p> <p align="center"><b>AND</b></p> <p>Before being named as the <i>RSO</i>, future <i>RSOs</i> will have successfully completed one of the training courses described in Criteria in the section entitled "Individual(s) Responsible for Radiation Safety Program and Their Training and Experience - Radiation Safety Officer" in NUREG-1556, Vol. 1, dated May 1997.</p>	<input checked="" type="checkbox"/>	[ ]
<b>8. TRAINING FOR INDIVIDUALS WORKING IN OR FREQUENTING RESTRICTED AREAS</b>	Before using licensed materials, authorized users will have successfully completed one of the training courses described in Criteria in the section entitled "Training for Individuals Working In or Frequenting Restricted Areas" in NUREG-1556, Vol. 1, dated May 1997.	<input checked="" type="checkbox"/>	[ ]
<b>9. FACILITIES AND EQUIPMENT</b>	No information needs to be submitted in response to this item; key issues are addressed under "Radiation Safety Program - Public Dose" and "Radiation Safety Program - Operating and Emergency Procedures".		Separate Item 9 Response Need Not Be Submitted With Application
<b>10. RADIATION SAFETY PROGRAM - AUDIT PROGRAM</b>	The applicant is <u>not</u> required to, and should not, submit its audit program to the <i>NRC</i> for review during the licensing phase.		Need Not Be Submitted With Application
<b>10. RADIATION SAFETY PROGRAM - TERMINATION OF ACTIVITIES</b>	The applicant is <u>not</u> required to submit a response to the termination of activities section during the initial application. However, when the license expires or at the time the licensee ceases operations, <i>NRC Form 314</i> must be submitted.		Need Not Be Submitted With Application
<b>10. RADIATION SAFETY PROGRAM - SURVEY INSTRUMENTS</b>	We will either possess and use, or have access to and use, a radiation survey meter that meets the Criteria in the section entitled "Radiation Safety Program - Instruments" in NUREG-1556, Vol. 1, dated May 1997, in the event of an incident.	<input checked="" type="checkbox"/>	[ ]
<b>10. RADIATION SAFETY PROGRAM - MATERIAL RECEIPT AND ACCOUNTABILITY</b>	Physical inventories will be conducted at intervals not to exceed 6 months, to account for all sealed sources and devices received and possessed under the license.	<input checked="" type="checkbox"/>	[ ]
<b>10. RADIATION SAFETY PROGRAM - OCCUPATIONAL DOSIMETRY</b>	Either we will maintain, for inspection by <i>NRC</i> , documentation demonstrating that unmonitored individuals are not likely to receive a radiation dose in excess of 10% of the allowable limits in 10 CFR Part 20 or we will provide dosimetry processed and evaluated by a <i>NVLA</i> P-approved processor that is exchanged at a frequency recommended by the processor.	<input checked="" type="checkbox"/>	[ ]
<b>10. RADIATION SAFETY PROGRAM - PUBLIC DOSE</b>	The applicant is <u>not</u> required to submit a response to the public dose section during the licensing phase. This matter will be examined during an inspection.		Need Not Be Submitted With Application

## APPENDIX B

ITEM NO. AND TITLE	SUGGESTED RESPONSE	YES	ALTERNATIVE PROCEDURES ATTACHED
10. RADIATION SAFETY PROGRAM - OPERATING & EMERGENCY PROCEDURES	<p>We will implement and maintain the operating and emergency procedures in <i>Appendix H</i> of NUREG-1556, Vol. 1, dated May 1997, and provide copies of these procedures to all gauge users and at each job site.</p> <p>OR</p> <p>Operating and emergency procedures will be developed, implemented, and maintained and will meet the criteria in the section entitled "Radiation Safety Program - Operating and Emergency Procedures" in NUREG-1556, Vol. 1, dated May 1997.</p>	<input checked="" type="checkbox"/>          <input type="checkbox"/>	<input type="checkbox"/>           
10. RADIATION SAFETY PROGRAM - LEAK TEST	Leak tests will be performed at intervals approved by the NRC or an Agreement State and specified in the Sealed Source and Device Registration Sheet. Leak tests will be performed by an organization authorized by NRC or an Agreement State to provide leak testing services for other licensees or using a leak test kit supplied by an organization authorized by NRC or an Agreement State to provide leak test kits to other licensees and according to the kit supplier's instructions.	<input checked="" type="checkbox"/>	<input type="checkbox"/> The information in <i>Appendix J</i> supporting a request to perform leak testing and sample analysis is attached.
10. RADIATION SAFETY PROGRAM - MAINTENANCE	<p><u>ROUTINE CLEANING &amp; LUBRICATION</u></p> <p>We will implement and maintain procedures for routine maintenance of our gauges according to each manufacturer's recommendations and instructions.</p> <p><u>NON-ROUTINE MAINTENANCE</u></p> <p>We will send the gauge to the manufacturer or other person authorized by NRC or an Agreement State to perform non-routine maintenance or repair operations that require the removal of the source or source rod from the gauge.</p>	<input checked="" type="checkbox"/>          <input checked="" type="checkbox"/>	<input type="checkbox"/>          <input type="checkbox"/> The information listed in <i>Appendix G</i> supporting a request to perform non-routine maintenance in-house is attached.
10. RADIATION SAFETY PROGRAM - TRANSPORTATION	The applicant is <u>not</u> required to submit its response to transportation during the licensing process. However, this issue will be reviewed during inspection.		Need Not Be Submitted With Application
11. WASTE MANAGEMENT - GAUGE DISPOSAL & TRANSFER	The applicant is <u>not</u> required to submit a response to waste management during the licensing process. However, the licensee should develop, implement, and maintain gauge transfer and disposal procedures in its radiation protection program.		Need Not Be Submitted With Application