

# ACCEPTANCE REVIEW MEMO (ARM)

5/1/06

Licensee: Union Asphalt, Inc.

License No.: 04-29226-01

Docket No.: 030-37178

Mail Control No.: 470929

Type of Action:  New  Amend  Renewal  
 Termination  Notification

Date of Requested Action: 3/6/06

Reviewer Assigned: Torres

ARM reviewer(s): Torres

Response	Deficiencies Noted During Acceptance Review
	1. <input checked="" type="checkbox"/> Open ended possession limits. <u>Submit inventory</u> <u>Limit possession.</u> <input checked="" type="checkbox"/> Inform licensee that we are limiting possession limits. <input checked="" type="checkbox"/> Ask the licensee if they have any type-amount of EPA Act Material.
	2.
	3.

Reviewer's Initials: RITC

Date: 5/1/06

<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Request for unrestricted use for Group II or higher category should be transferred by memo to FCDB within 10 days of receipt.
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Decommissioning notification should be completed within 30 days.
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Termination request < 90 days from date of expiration
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Expedite (medical emergency, no RSO, location of use/storage not on license, RAM in possession not on license, other)
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	TAR needed to complete action.

Branch Chief's and/or Sr. HP's Initials: RITC Date: 5/1/06

**SUNSI Screening according to RIS 2005-31**

No **Non-Publicly Available, Sensitive** if any item below is checked

General guidance:

- RAM = or > than Category 3 (Table 1, RIS 2005-31), use Unity Rule
- Exact location of RAM (whether = or > than Category 3 or not)
- Design of structure and/or equipment (site specific)
- Information on nearby facilities
- Detailed design drawings and/or performance information
- Emergency planning and/or fire protection systems

Specific guidance for medical, industrial and academic (above Category 3):

- RAM quantities and inventory
- Manufacturer's name and model number of sealed sources & devices
- Site drawings with exact location of RAM, description of facility
- RAM security program information (locks, alarms, etc.)
- Emergency Plan specifics (routes to/from RAM, response to security events)
- Vulnerability/security assessment/accident-safety analysis/risk assess
- Mailing lists related to security response

Branch Chief's and/or Sr. HP's Initials: RITC Date: 5/1/06

**Applicant Information:**

Control No. 470929

Name: <b>Union Asphalt, Inc.</b>	Type of Request: <input checked="" type="checkbox"/> New, <input type="checkbox"/> Renewal, or <input type="checkbox"/> Amendment Program Code(s): <b>03121</b>
Location: <b>Santa Maria, CA</b>	License No.: <b>04-2227-01</b> Docket No.: <b>030-37178</b>

**STEP 1—Radioactive Materials and Quantities Requested:**

<b>Instructions for Step 1:</b> Complete Step 1 for all applications. If all your responses in Step 1 are "No" then do not complete Step 2 (Screening Criteria). Sign and date the completed step-sheet and add it as the sensitive and non-publicly available OAR in ADAMS. If a "yes" response is indicated for any item in Step 1, also complete Step 2. If the type of use is subject to a Security Order or the requirements for increased controls, complete Step 3 (Item A or Item B) without delay.	Yes or No
A. The request is from a new applicant.	<b>Yes</b>
B. NUREG-1556, Volume 20, Section 4.9 indicates a licensing site visit is needed for the requested type of use, e.g., (1) Type A broad scope license, (2) panoramic irradiator containing > 10000 curies, (3) manufacturers or distributors using unsealed radioactive material or significant quantities of sealed material, (4) radioactive waste brokers, (5) radioactive waste incinerators, (6) commercial nuclear laundries, and (7) any other application that in the judgement of the reviewer and cognizant supervisor involves complex technical issues, complex safety questions, or unprecedented issues that warrant a site visit.	<b>NO</b>
C. The applicant requested certain radionuclides and quantities that equal or exceed the Risk Significant Quantity (TBq) values in the table, below, that have been "highlighted" by the reviewer	<b>NO</b>

**Table of Risk Significant Quantities**

(Category 2 Quantities, IAEA Safety Guide No. RS-G-1.9, Categorization of Radioactive Sources, August 2005)

Radionuclide	Risk Significant Quantity (TBq <sup>1</sup> )	Risk Significant Quantity (Ci <sup>1</sup> )	Radionuclide	Risk Significant Quantity (TBq <sup>1</sup> )	Risk Significant Quantity (Ci <sup>1</sup> )
Am-241	0.6	16	Pm-147	400	11,000
Am-241/Be	0.6	16	Pu-238	0.6	16
Cf-252	0.2	5.4	Pu-239/Be	0.6	16
Cm-244	0.5	14	Ra-226 <sup>2</sup>	0.4	11
Co-60	0.3	8.1	Se-75	2	54
Cs-137	1	27	Sr-90 (Y-90)	10	270
Gd-153	10	270	Tm-170	200	5,400
Ir-192	0.8	22	Yb-169	3	81

<sup>1</sup> The primary values are TBq. The curie (Ci) values are for informational purposes only.  
<sup>2</sup> The Atomic Energy Act, as amended by the Energy Policy Act of 2005, authorizes NRC to regulate Ra-226 and NRC is in the process of amending its regulations for discrete sources of Ra-226.

Calculations of the Total Activity or the Unity Rule are attached to document whether or not the screening criteria in Step 2 were also completed to evaluate the application. <b>NOTE—If an amendment of an existing license is being requested, the calculations will include the previously authorized quantities for the radionuclide(s).</b>	Yes, No, or Not Applicable (NA)
Total Activity—multiple activities are requested for a single radionuclide and the sum of the activities equals or exceeds the quantity of concern for the radionuclide	<b>NO</b>
Unity Rule—multiple radionuclides are requested and the sum of the ratios equals or exceeds unity, e.g., [(total activity for radionuclide A) ÷ (risk significant quantity for radionuclide A)] + [(total activity for radionuclide B) ÷ (risk significant quantity for radionuclide B)] ≥ 1.0.	<b>NO</b>

**Signature and Date for Step 1:**

*Rue to S. Deen* 5/1/06  
 License Reviewer and Date

**STEP 2-Screening Criteria:**


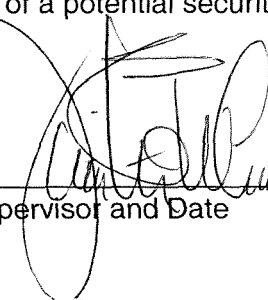
Control No. **470929**

<p><b>Instructions for Step 2:</b> Complete Step 2 for any application that yielded a "yes" response for any item in Step 1. The reviewer is expected to use safety information in the application as well as sources of information that are outside of the application. Document the review of each screening criteria below. For each criterion, provide a preliminary indication in the last column as to whether or not an additional evaluation may be needed to reasonably assure that the requested materials will be used as intended. Summarize the review below the table and sign, date, and place the completed step-sheet as the sensitive and non-publicly available OAR in ADAMS. If an additional evaluation of a potential security risk is needed, complete Step 3 (Item C) without delay.</p>		<p>Preliminary Indication-- Additional Evaluation in Step 3 Needed? (yes or no)</p>
<p>Refer to Initial Implementation Guidance (ML061080231) for each criterion, below.</p>	<p>Review Notes</p>	
A. Request for Materials	Am-241, Cs-137 used in portable gauges. Millicurie quantities.	NO
B. Former Licensee or Authorized User	Applicant currently possesses California License 6792-42 for Am-241, Cs-137 for P.G.	NO
C. Ownership/Senior Management	Company president signed ARC Form 313.	NO
D. Radiation Safety Officer	Andrew Marsalek, RSO Troxler training 3/28/06.	NO
E. Authorized User	Proposed AU's have received Troxler training.	NO
F. Fee Payment	Fees paid (\$1,100), OK by Brenda Brown 4/13/06.	NO
G. Financial Assurance	Not applicable.	N/A
H. Deficiency correspondence	Requested additional information and adequate response was received.	NO
I. Contacts to the applicant	Requested current inventory.	NO
J. Public Web Sites	N/A.	N/A
K. Pre-Licensing Visit	Not applicable. Will conduct pre-licensing telephone conference.	NO
L. Security	Licensee committed to follow App.H of NUREG-1556 Vol. 1	NO

**Summary:**

Summarize the preliminary indicators and decide whether or not an additional evaluation is needed to provide reasonable assurance that materials will be used as intended. Provide rationale to support the decision. To request an additional evaluation of a potential security risk, complete Step 3 (Item C) without delay.

**Signatures and Dates for Step 2:**

 5/1/06  
 License Reviewer and Date
  5/1/06  
 Supervisor and Date

**STEP 3-Notify NRC Headquarters (NMSS/IMNS/MSIB-A):**

**Control No.**

**Instructions for Step 3:** Mark the type of notification below and attach a copy of the additional information, as appropriate. Place the completed step-sheet with attachments as the sensitive and non-publicly available OAR in ADAMS. Designated staff in IMNS will process the incoming email or TAR package. IMNS will reply to acknowledge receipt and indicate the action(s) and a proposed schedule to complete the action(s).

A. Security Orders      The cognizant supervisor sent an email to NMSS/IMNS/MSIB-A at Security\_Orders@nrc.gov. The email requested MSIB-A to prepare Orders to accompany the specific license and provided the applicant's contact information. A copy of the email is attached.

B. Increased Controls      The cognizant supervisor sent an email to NMSS/IMNS/MSIB-A at Security\_Orders@nrc.gov. The email requested MSIB-A to prepare Orders to accompany the specific license or requested MSIB-A to update the National Source Interim Inventory and provided a recently issued licensing action, e.g., to add or remove increased controls from a license or terminate a license. A copy of the email is attached.

C. Request for additional evaluation of the applicant      As per NUREG-1556, Volume 20, Section 4.14, Technical Assistance Request-Materials Licensees, the cognizant supervisor sent a TAR package to NMSS/IMNS/MSIB-A after the screening criteria in Step 2 were evaluated. The license reviewer could not determine or has some doubt that radioactive material will be used as intended. The package included the TAR form and completed Step 2 worksheet. The package from an Agreement State supervisor was routed through the Regional State Agreements Officer as per Management Directive 5.7, "Technical Assistance for Agreement States," (revised November 19, 2004).

Action      Headquarters notified by e-mail Date: \_\_\_\_\_

Action      TAR provided to HQ Date: \_\_\_\_\_

*NOT APPLICABLE*

**Signatures and Dates for Step 3:**

\_\_\_\_\_  
License Reviewer and Date

\_\_\_\_\_  
Supervisor and Date

## ITEM 1: ACTION TYPE

<u>ACTION TYPE:</u> <input checked="" type="checkbox"/> New <input type="checkbox"/> Amendment <input type="checkbox"/> Renewal	<u>ADMINISTRATIVE REVIEW:</u> <input checked="" type="checkbox"/> Current Guidance Used <input checked="" type="checkbox"/> References in Application Based On Current Regulations
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## ITEM 2: LEGAL IDENTITY

NAME:	Union Asphalt, Inc.
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## ITEMS 2 AND 3: ADDRESS

STORAGE & LOCATION OF USE Temporary job sites in NRC Jurisdiction	MAILING ADDRESS P.O. Box 1280 Santa Maria, CA 93456
Temporary Job Sites <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	

## ITEM 4: PERSON TO BE CONTACTED ABOUT THIS APPLICATION

CONTACT PERSON:	Andy Marsalek
TELEPHONE:	805-896-3163

Application dated 3/6/06  
 Facsimile dated 4/3/06

Add in cover letter:

- 1- Public dose text (already committed in application, no need to repeat.)
- 2- Two independent physical control measures

6/12/06 Pre-licensing telephone conference call held with Brian Shiffrey,  
 Alternate Radiation Safety Officer on 6/12/06 3:50pm - 4:10pm.

Roberto

**ITEMS 5 AND 6: MATERIALS TO BE POSSESSED AND USES**

Yes	No	Radioisotope	Model No.	Quantity	Use As Listed on SSD Certificate	Specify Other Uses Not Listed on SSD Certificate
✓		Cesium-137 9mCi  as per NC-646-D-138-S	Sealed source manufacturer or distributor and model number:  Device manufacturer or distributor and model number: <u>Troxler 3450</u>	Not to exceed either the maximum activity per source or maximum activity per device as specified in Sealed Source and Device Registration (SSDR) Certificate	Yes <input checked="" type="checkbox"/>  Specific description of the gauge use: <u>measure physical properties of material.</u>	<input checked="" type="checkbox"/> Not applicable  <input type="checkbox"/> Uses are:
✓		Americium-241 44mCi  as per NC-646-D-138-S	Sealed source manufacturer or distributor and model number:  Device manufacturer or distributor and model number: <u>Troxler 3450</u>	Not to exceed either the maximum activity per source or maximum activity per device as specified in SSDR Certificate	Yes <input checked="" type="checkbox"/>  Specific description of the gauge use: <u>measure physical properties of material.</u>	<input checked="" type="checkbox"/> Not applicable  <input type="checkbox"/> Uses are:
	✓	Californium-252	Sealed source manufacturer or distributor and model number:  Device manufacturer or distributor and model number:	Not to exceed either the maximum activity per source or maximum activity per device as specified in SSDR Certificate	Yes <input type="checkbox"/>  Specific description of the gauge use: _____ _____ _____	<input type="checkbox"/> Not applicable  <input type="checkbox"/> Uses are:

Yes	No	Radioisotope	Model No.	Quantity	Use As Listed on SSD Certificate	Specify Other Uses Not Listed on SSD Certificate
	✓	Other Isotope (Specify):	Sealed source manufacturer or distributor and model number: _____ Device manufacturer or distributor and model number: _____	Not to exceed either the maximum activity per source or maximum activity per device as specified in SSDR Certificate	Yes <input type="checkbox"/> Specific description of the gauge use: _____ _____ _____ _____	<input type="checkbox"/> Not applicable <input type="checkbox"/> Uses are: _____
<i>Financial Assurance Required and Evidence of Financial Assurance Provided</i>						<i>N/A</i>

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

ITEM NUMBER AND TITLE	SUGGESTED RESPONSE	APPLICANT'S RESPONSE			
		YES	NO	OTHER	
				YES	NO
<p>ITEM 7 INDIVIDUAL(S) RESPONSIBLE FOR RADIATION SAFETY PROGRAM AND THEIR TRAINING AND EXPERIENCE – RADIATION SAFETY OFFICER</p> <p>NAME _____</p> <p><i>Andrew Marsalek</i> <i>RSO Troxler Training</i> <i>3/28/00</i></p>	<p>Before obtaining licensed materials, the proposed RSO 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, Rev. 1, dated November 2001.</p> <p><i>Optional Response</i> Criteria for Acceptable Training Courses for Radiation Safety Officer/Portable Gauge Users</p> <p>Course Content</p> <ul style="list-style-type: none"> <li>• 1.5 to 2 hours of radiation safety and regulatory requirements;</li> <li>• 1.5 to 2 hours practical explanation of gauge theory and operation (including test runs).</li> </ul> <p>Course Examination</p> <ul style="list-style-type: none"> <li>• 25- to 50-question written (closed book) test – 70 percent grade.</li> </ul> <p>Course Instructor Qualifications</p> <ul style="list-style-type: none"> <li>• Bachelor's degree in a physical or life science or engineering with successful completion of both a portable gauge user course and 8-hour radiation safety course and 8 hours hands-on of experience with portable gauges.</li> </ul> <p style="text-align: center;"><b>OR</b></p>	✓			



ITEM NUMBER AND TITLE	SUGGESTED RESPONSE	APPLICANT'S RESPONSE			
		YES	NO	OTHER	
				YES	NO
ITEM 7 (CONTINUED)	<ul style="list-style-type: none"> <li>• An individual with the following training:               <ul style="list-style-type: none"> <li>— Successful completion of portable gauge user course;</li> <li>— Successful completion of 40-hour radiation safety course;</li> <li>— 30 hours of hands-on experience with portable gauges.</li> </ul> </li> </ul>				
ITEM 8 TRAINING FOR INDIVIDUALS WORKING IN OR FREQUENTING RESTRICTED AREAS	<p>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, Rev. 1, dated November 2001.</p> <p><i>Optional Response</i> Review optional response against criteria listed under Item 7.</p>	✓			
ITEM 9 FACILITIES AND EQUIPMENT	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			
ITEM 10 RADIATION SAFETY PROGRAM – AUDIT PROGRAM	The applicant is <i>not</i> required to, and should not, submit its audit program to NRC for review during the licensing phase.	Need Not Be Submitted With Application			
ITEM 10 RADIATION SAFETY PROGRAM – TERMINATION OF ACTIVITIES	The applicant is <i>not</i> 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, NRC Form 314 must be submitted.	Need Not Be Submitted With An Individual With the Following Training			
ITEM 10 RADIATION SAFETY PROGRAM – INSTRUMENTS	<p>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, Rev. 1, dated November 2001, in the event of an incident.</p> <p><i>Optional Response</i> A radiation survey meter should satisfy the following criteria:</p> <ul style="list-style-type: none"> <li>• Be capable of detecting gamma radiation;</li> <li>• Be checked for functionality before use.</li> </ul>	✓			

APPENDIX M

ITEM NUMBER AND TITLE	SUGGESTED RESPONSE	APPLICANT'S RESPONSE			
		YES	NO	OTHER	
				YES	NO
ITEM 10 RADIATION SAFETY PROGRAM – MATERIAL RECEIPT AND ACCOUNTABILITY	<p>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.</p> <p><del><i>Optional Response</i></del>                      Frequency and procedures to ensure no gauge is lost, stolen or misplaced, and if possession exceeds threshold, comply with financial assurance requirements in 10 CFR 30.35.</p>	✓			
ITEM 10 RADIATION SAFETY PROGRAM – OCCUPATIONAL DOSIMETRY	<p>Either we will maintain, for inspection by NRC, documentation demonstrating that unmonitored individuals are not likely to receive a radiation dose in excess of 10 percent of the allowable limits in 10 CFR Part 20 or we will provide dosimetry processed and evaluated by an NVLAP-approved processor that is exchanged at a frequency recommended by the processor.</p> <p><del><i>Optional Response</i></del>                      Alternative response demonstrates compliance with 10 CFR Part 20 requirements.</p>	✓			
ITEM 10 RADIATION SAFETY PROGRAM – PUBLIC DOSE	The applicant is <i>not</i> required to submit a response to public dose section during the licensing phase. This matter will be examined during an inspection.	Need Not Be Submitted With Application			

ITEM NUMBER AND TITLE	SUGGESTED RESPONSE	APPLICANT'S RESPONSE			
		YES	NO	OTHER	
				YES	NO
ITEM 10 RADIATION SAFETY PROGRAM – OPERATING & EMERGENCY PROCEDURES	<p>We will implement and maintain the operating and emergency procedures in Appendix H of NUREG-1556, Vol. 1, Rev. 1, dated November 2001 and provide copies of these procedures to all gauge users and at each job site.</p> <p style="text-align: center;"><b>OR</b></p> <p><del>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, Rev. 1, dated November 2001.</del></p> <p style="text-align: center;"><i>Optional Response</i></p> <ul style="list-style-type: none"> <li>• <del>Instructions to use gauge and perform routine maintenance per manufacturer's recommendations and instructions;</del></li> <li>• <del>Instructions to maintain security during storage and transportation;</del></li> <li>• <del>Instructions to keep the gauge under control and immediate surveillance during use;</del></li> <li>• <del>Steps to take to keep radiation exposures ALARA;</del></li> <li>• <del>Steps to maintain accountability during use;</del></li> <li>• <del>Steps to control access to damaged gauge;</del></li> <li>• <del>Steps to take, and whom to contact, when a gauge has been damaged;</del></li> <li>• <del>If gauges are used for measurements greater than 3 feet beneath the surface: use of surface casing or other procedures to ensure free movement of source in hole; instructions, procedures to retrieve a stuck source; NRC reporting requirements;</del></li> <li>• <del>Copies provided to personnel and available at each job site.</del></li> </ul>	✓			

APPENDIX M

ITEM NUMBER AND TITLE	SUGGESTED RESPONSE	APPLICANT'S RESPONSE			
		YES	NO	OTHER	
				YES	NO
ITEM 10 RADIATION SAFETY PROGRAM – LEAK TEST	<p>Leak tests will be performed at intervals approved by NRC or an Agreements State and will be specified in the SDDR 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 Agreements State to provide leak test kits to other licensees and according to the kit supplier's instructions.</p> <p><i>Optional Response</i> Provide the information in Appendix J supporting a request to perform leak testing and sample analysis:</p> <ul style="list-style-type: none"> <li>• Individual who will make the analysis; qualifications to make quantitative measurements;</li> <li>• Leak test frequency as specified in the appropriate SDDR Sheet;</li> <li>• How and where test samples taken; materials to be used; methods of handling samples to prevent or minimize exposure to personnel;</li> <li>• Type of instrument(s) used, counting efficiency, and minimum levels of detection for each radionuclide.</li> </ul> <p><i>Note: An instrument capable of making quantitative measurements should be used; hand-held survey meters will not normally be considered adequate for measurements.</i></p> <ul style="list-style-type: none"> <li>• Standard calibration sources including for each: the radionuclide, quantity, accuracy, and traceability to primary radiation standards;</li> </ul> <p><i>Note: Accuracy of standards should be within ±5 percent of the stated value and traceable to a primary radiation standard such as those maintained by the National Institutes of Standards and Technology (NIST).</i></p> <ul style="list-style-type: none"> <li>• Sample calculation to convert measurement data to becquerels (or microcuries);</li> <li>• Instructions on actions, notifications regarding leaking source.</li> </ul>	✓			

ITEM NUMBER AND TITLE	SUGGESTED RESPONSE	APPLICANT'S RESPONSE			
		YES	NO	OTHER	
				YES	NO
ITEM 10 RADIATION SAFETY PROGRAM – MAINTENANCE	<p><i>Routine Cleaning and Lubrication</i></p> <p>We will implement and maintain procedures for routine maintenance of our gauges according to each manufacturer's recommendations and instructions.</p> <p><del><i>Optional Response</i></del></p> <ul style="list-style-type: none"> <li>• <del>Considers ALARA;</del></li> <li>• <del>Ensures gauge functions as designed;</del></li> <li>• <del>Ensures source integrity not compromised.</del></li> </ul> <p><i>Non-Routine Maintenance</i></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> <p><del><i>Optional Response</i></del></p> <p>Provide the information listed in Appendix G supporting a request to perform non-routine maintenance in-house.</p> <ul style="list-style-type: none"> <li>• <del>Types of work to be performed;</del></li> <li>• <del>Who will perform maintenance, training, experience, why competent;</del></li> <li>• <del>Handling procedures: doses to public, personnel ALARA and regulatory limits; security; posting; manufacturing instructions and recommendations;</del></li> <li>• <del>Use of whole-body and extremity monitoring or evaluation to demonstrate that individuals are not likely to receive greater than 10 percent of allowable limits;</del></li> <li>• <del>Possess survey instrument (detects gamma radiation, range 1-50 mrem/hr; annual calibration w/point source at 2 points/scale; readings within ±20 percent; calibrated by NRC/Agreement State licensee; checked before use);</del></li> <li>• <del>10 CFR 20.1301 surveys (when and where instrument survey performed, records for 3 years).</del></li> </ul>	✓			
			✓		

APPENDIX M

ITEM NUMBER AND TITLE	SUGGESTED RESPONSE	APPLICANT'S RESPONSE			
		YES	NO	OTHER	
				YES	NO
ITEM 10 RADIATION SAFETY PROGRAM – TRANSPORTATION	The applicant is <i>not</i> required to submit a response to transportation section during the licensing process. However, this issue will be reviewed during inspection.	Need Not Be Submitted With Application			
ITEM 11 WASTE DISPOSAL – GAUGE DISPOSAL AND TRANSFER	The applicant is <i>not</i> required to submit a response to waste management section during the licensing process. However, the licensee should develop, implement, and maintain gauge transfer and disposal procedures in its radiation safety program.	Need Not Be Submitted With Application			

**From:** <amarsalek@unionasphalt.com>  
**To:** <RJT@nrc.gov>  
**Date:** 05/05/2006 8:09:15 AM  
**Subject:** RE: Request for additional information

Mr. Torres,

We have 2 Troxler 3450 gauges.

----- Original Message -----

From: RJT@nrc.gov  
To: amarsalek@unionasphalt.com  
Subject: RE: Request for additional information  
Date: Mon, 01 May 2006 16:52:04 -0400

>Mr. Marsalek:

>

>1. Please tell me how many portable gauges Union Asphalt currently  
>possesses and their manufacturer's name and model number. Example:  
>Three Troxler 3450, etc.

>

>2. You need to contact Vandenberg Air Force Base and confirm which  
>parts of the base fall under exclusive Federal jurisdiction (i.e.  
>will need an NRC license to use the portable gauge in those areas).  
>Our records indicate that all Vandenberg AFB falls under the State of  
>California jurisdiction (i.e. you can use your gauges under your  
>California license) EXCEPT Tracts 101 and 102 within the base which  
>are areas of exclusive Federal jurisdiction.

>

>Exclusive Federal jurisdiction is determined by who purchased and  
>owns the land.

>

>Roberto J. Torres  
>Senior Health Physicist  
>U.S. Nuclear Regulatory Commission, Region IV  
>Division of Nuclear Materials Safety  
>Nuclear Materials Licensing Branch  
>611 Ryan Plaza Drive, Suite 400  
>Arlington, Texas 76011  
>Telephone 817-860-8189  
>Facsimile 817-860-8188  
>rjt@nrc.gov

**Mail Envelope Properties** (445B4E61.026 : 13 : 53286)

**Subject:** RE: Request for additional information  
**Creation Date** 05/05/2006 8:08:47 AM  
**From:** <amarsalek@unionasphalt.com>  
**Created By:** amarsalek@unionasphalt.com

**Recipients**

nrc.gov  
ARL\_PO.ARL\_DO  
RJT (Roberto Torres)

<b>Post Office</b>	<b>Route</b>
ARL_PO.ARL_DO	nrc.gov

<b>Files</b>	<b>Size</b>	<b>Date &amp; Time</b>
MESSAGE	1220	05/05/2006 8:08:47 AM
Mime.822	2333	

**Options**

**Expiration Date:** None  
**Priority:** Standard  
**ReplyRequested:** No  
**Return Notification:** None

**Concealed Subject:** No  
**Security:** Standard

**Junk Mail Handling Evaluation Results**

Message is eligible for Junk Mail handling  
This message was not classified as Junk Mail

**Junk Mail settings when this message was delivered**

Junk Mail handling disabled by User  
Junk Mail handling disabled by Administrator  
Junk List is not enabled  
Junk Mail using personal address books is not enabled  
Block List is not enabled