

## ACCEPTANCE REVIEW MEMO (ARM)

**Licensee:** Rocksol Consulting Group, Inc      **License No.:** 05-29243-01  
**Docket No.:** 030-37378      **Mail Control No.:** 471266  
**Type of Action:** Amend      **Date of Requested Action:** 02-15-07  
**Reviewer Assigned:**      **ARM reviewer(s):** Torres

Response	Deficiencies Noted During Acceptance Review
	<input type="checkbox"/> Open ended possession limits. Limit possession. Submit inventory. <input type="checkbox"/> Submit copies of most recent leak test results. <input type="checkbox"/> Add - delete IC license condition. Add IC paragraph in cover letter. <input type="checkbox"/> Split license from cover letter. Add SUNSI marking to license. <input type="checkbox"/> Ask the licensee if they have any type-amount of EPAct Material.

**Reviewer's Initials:** \_\_\_\_\_ **Date:** \_\_\_\_\_

- ☐ Yes ☐ No      Unrestricted release Group 2 or >: Transfer memo to FCDB within 10 days.  
☐ Yes ☐ No      Decommissioning notification should be completed within 30 days.  
☐ Yes ☐ No      Termination request < 90 days from date of expiration  
☐ Yes ☐ No      Expedite (medical emergency, no RSO, location of use/storage not on license, RAM in possession not on license, other)  
☐ Yes ☐ No      TAR needed to complete action.

**Branch Chief's and/or Sr. HP's Initials:** \_\_\_\_\_ **Date:** \_\_\_\_\_

### SUNSI Screening according to RIS 2005-31

☐ Yes ☒ 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:** NITR **Date:** 2-16-07

# Pre-Licensing Screening

## Applicant Information:

Control No. 471266

Name: Rocksol Consulting Group, Inc	Type of Request: Amend Program Code(s):
Location: CO	License No.: 05-29243-01      Docket No.: 030-37378

## STEP 1—Radioactive Materials and Quantities Requested:

<b>Instructions for Step 1: Complete Step 1 for all applications.</b> 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.	N
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.	N
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	N

## 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	—
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.	✓

## Signature and Date for Step 1:

RTC 2-16-07  
License Reviewer and Date

# RockSol

Consulting Group, Inc.

2995 Wilderness Place  
Suite 200  
Boulder, CO 80301

Phone: (303) 998-0696  
Fax: (303) 998-0698  
e-mail: saeb@rocksol.com

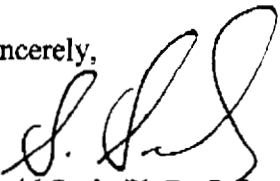
February 15, 2007

RTT  
Ms. Rachel Browder  
Nuclear Materials Licensing Branch  
U.S. Nuclear Regulatory Commission, Region IV  
611 Ryan Plaza Dr, Suite 400  
Arlington, Texas 76011-8064

Dear Ms. Browder,

I am writing this letter to request that our NRC Material License be updated. Please remove Mr. Hugh Hutton as the named Radiation Safety Officer. To update, please name Richard Smith as the current R.S.O. for RockSol. I have included the necessary training and certification documentation for Mr. Smith. Thank you, and please contact me should you have any questions.

Sincerely,

  
Saad Saeb, Ph.D., P.E.  
President  
RockSol Consulting Group

Enc (3)  
RSO Cert.  
HAZMAT Cert.  
Rad. Saf. Nuke Gauge

# *Certificate of Completion*

**This certifies that**

**Richard Smith**

**has successfully completed the**

**Radiation Safety Officer Class**

**conducted by the training department of**

*Troxler Electronic Laboratories, Inc.*



**Robert Wilson**  
Instructor

**2/2/2007**  
Date

*William F. Troxler, Jr.*  
**President**



Troxler Electronic Laboratories, Inc.  
PO Box 12057 • 3008 Cornwallis Rd. • Research Triangle Park, NC 27709  
Phone: (919) 549-8661 • Fax: (919) 549-0761 • Web site: [www.troxlerlabs.com](http://www.troxlerlabs.com)

*Enrollment ID: 21919*

# HAZMAT Certification

as required by U.S. DOT and IATA

*This certifies that*

**Richard Smith**

*has been trained and tested in accordance with the U.S. Department of Transportation and International Air Transport Association (IATA) hazardous material requirements for general awareness/familiarization, function-specific, safety, and security awareness training as related to the transportation of nuclear gauges. A description of the training course materials is available from Troxler Electronic Laboratories, Inc.*

**2/2/2007**  
*Training Date*

**2/2/2010**  
*Expiration Date*

**Robert Wilson**  
*Instructor*



**Troxler Electronic Laboratories, Inc.**  
PO Box 12057 • 3008 Cornwallis Rd. • Research Triangle Park, NC 27709  
Phone: (919) 549-8661 • Fax: (919) 549-0761 • [www.troxlerlabs.com](http://www.troxlerlabs.com)

## ***Hazmat Employer Certification***

*Company:* Rock Sol Consulting Group, Inc  
2995 Wilderness Place  
Suite 200  
Boulder, CO 80301

*Company Official:* \_\_\_\_\_ *Date:* \_\_\_\_\_

*Enrollment ID: 21919*

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ROCKSOL

No. 0915 P. 2

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Nº 37566

# Certificate Of Completion

This is to certify that RICHARD SMITH has completed the  
basic CPN® training course on Radiation Safety and Use of Nuclear Gauges,  
held this 17 day of APRIL 2001 in the  
City of ARVADA State of COLO. by CPN International.

CPN International, Inc.  
2830 Howe Road  
Martinez, CA 94563 USA  
Phone: (925) 228-8770  
Fax: (925) 228-3183



Russ Proff  
INSTRUCTOR  
Douglas Carter  
RADIATION SAFETY OFFICER

FEB 20 2007

DATE

This is to acknowledge the receipt of your letter/application dated 2-15-07, and to inform you that the initial processing, which includes an administrative review, has been performed.

☒ There were no administrative omissions. Your application will be assigned to a technical reviewer. Please note that the technical review may identify additional omissions or require additional information.

☐ Please provide to this office within 30 days of your receipt of this card:

The action you requested is normally processed within 90 days.

☐ A copy of your action has been forwarded to our License Fee & Accounts Receivable Branch, who will contact you separately if there is a fee issue involved.

Your action has been assigned **Mail Control Number** 471266.  
When calling to inquire about this action, please refer to this mail control number.  
You may call me at 817-860-8103.

Sincerely,

*Colleen Murnahan*

Licensing Assistant

**BETWEEN.**

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.....
Program Code: 03121
Status Code: 0
Fee Category: 3P
Exp. Date: 20161231
Fee Comments:
Decom Flt Assur Reqd: N
.....
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LICENSE FEE TRANSMITTAL

### A. REGION

- |                         |                                |
|-------------------------|--------------------------------|
| 1. APPLICATION ATTACHED | ROCKSOL CONSULTING GROUP, INC. |
| Applicant/Licensee:     | 20070215                       |
| Received Date:          | 3037378                        |
| Docket No:              | 471266                         |
| Control No.:            | 05-29243-01                    |
| License No.:            | Amendment                      |
| Action Type:            |                                |

2. FEE ATTACHED  
Amount:             
Check No.:

- ### 3. COMMENTS

Signed \_\_\_\_\_  
Date 02-15-07

B. LICENSE FEE MANAGEMENT BRANCH (Check when milestone 03 is entered / \_\_/ )

1. Fee Category and Amount: \_\_\_\_\_
2. Correct Fee Paid. Application may be processed for:  
Amendment \_\_\_\_\_  
Renewal \_\_\_\_\_  
License \_\_\_\_\_
3. OTHER \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_
- Signed \_\_\_\_\_  
Date \_\_\_\_\_