



UNITED STATES  
**NUCLEAR REGULATORY COMMISSION**  
REGION I  
475 ALLENDALE ROAD  
KING OF PRUSSIA, PENNSYLVANIA 19406-1415

May 7, 2007

Docket No. 03034422  
Control No. 140064

License No. 37-30385-01

Bernard M. Milhalcin  
President  
Pennsylvania Soil and Rock, Inc.  
570 Beatty Road  
Monroeville, PA 15146

**SUBJECT: PENNSYLVANIA SOIL AND ROCK, INC., REQUEST FOR ADDITIONAL INFORMATION CONCERNING APPLICATION FOR RENEWAL OF LICENSE, CONTROL NO. 140064**

Dear Mr. Milhalcin:

This is in reference to your application dated March 28, 2007 requesting to renew Nuclear Regulatory Commission License No. 37-30385-01. In order to continue our review, we need the following additional information:

1. In your renewal application, you requested twenty-one (21) different models of portable gauges. After reviewing your request and the most current Sealed Source and Device Registration (SSDR) for each model, the following table was compiled. We are now required to list maximum possession limits in Column 8 of your license. Please review the table and fill in the blanks for the maximum possession limits:

A.	Cesium 137	A.	Sealed sources (Troxler Drawing No. A-102112)	A.	9 millicuries per source and _____ millicuries total
B.	Cesium-137	B.	Sealed Sources (Isotope Product Laboratories Model No. HEG-137)	B.	9 millicuries per source and _____ millicuries total
C.	Cesium 137	C.	Sealed Sources (AEA Technology QSA Inc. Model No. CDC.805)	C.	11 millicuries per source and _____ millicuries total
D.	Americium 241	D.	Sealed Sources (Troxler Drawing No. A-102451)	D.	44 millicuries per source and _____ millicuries total
E.	Americium 241	E.	Sealed Sources (Isotope Product Laboratories Model No. Am1.NO2)	E.	44 millicuries per source and _____ millicuries total
F.	Americium 241	F.	Sealed Sources (AEA Technology Model No. AMN.V997)	F.	11 millicuries per source and _____ millicuries total

G.	Americium 241	G.	Sealed Sources (Troxler Drawing No. A-106510)	G.	11 millicuries per source and _____ millicuries total
H.	Americium 241	H.	Sealed Sources (Troxler Drawing No. A-102700)	H.	11 millicuries per source and _____ millicuries total
I.	Americium 241	I.	Sealed Sources (AEA Technology QSA Inc. Model No. AMN.V997)	I.	44 millicuries per source and _____ millicuries total
J.	Americium 241	J.	Sealed Sources (Troxler Drawing No. A-102113)	J.	60 millicuries per source and _____ millicuries total
K.	Americium 241	K.	Sealed Sources (Troxler Drawing No. A-100608)	K.	110 millicuries per source and _____ millicuries total
L.	Americium 241	L.	Sealed Sources (Troxler Drawing No. A-100337)	L.	330 millicuries per source and _____ millicuries total
M.	Americium 241	M.	Sealed Sources (Troxler Drawing No. A-106580)	M.	44 millicuries per source and _____ millicuries total
N.	Californium 252	N.	Sealed Sources (Troxler Drawing No. A-105162)	N.	110 microcuries per source and _____ microcuries total
O.	Californium 252	O.	Sealed Sources (Troxler Drawing No. A-105862)	O.	110 microcuries per source and _____ microcuries total
P.	Californium 252	P.	Sealed Sources (Troxler Drawing No. A-105779)	P.	66 microcuries per source and _____ microcuries total
Q.	Californium 252	Q.	Sealed Sources (Troxler Drawing No. A-105560)	Q.	66 microcuries per source and _____ microcuries total

Authorized Use:

A. and B. In Troxler Electronic Labs, Inc. Model Nos. 4640 & 4640-B portable gauging devices for measuring physical properties of materials.

A, B, D, E, M and Q. In Troxler Electronic Labs, Inc. 3400 Series Model Nos. 3430, 3430-M, 3430 Plus, 3440, and 3440-M, 3440 Plus, 3450, 3451 portable gauging devices for measuring physical properties of materials.

D. and E. In Troxler Electronic Labs, Inc. Model No. 3216 portable gauging devices for measuring physical properties of materials.

D. In Troxler Electronic Labs, Inc. Model Nos. 3217 and 3218 portable gauging devices for measuring physical properties of materials.

E. and F. In Troxler Electronic Labs, Inc. Model Nos. 4301 and 4302 portable gauging devices for measuring physical properties of materials.

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- G. and P. In Troxler Electronic Labs, Inc. Model No. 4430 portable gauging devices for measuring physical properties of materials.
- N. and O. In Troxler Electronic Labs, Inc. Model Nos. 3242 and 4232 portable gauging devices for measuring physical properties of materials.
- A., D. and J. In Troxler Electronic Labs, Inc. Model Nos. 3411 and 3411B portable gauging devices for measuring physical properties of materials.
- K. and L. In Troxler Electronic Labs, Inc. Model Nos. 3241-C and 3241-G portable gauging devices for measuring physical properties of materials.
- A., E. and H. In Troxler Electronic Labs, Inc. Model No. 4350 portable gauging devices for measuring physical properties of materials.
- B., C., E. and I. In Instro Tek, Inc. Model No. Xplorer 3500 portable gauging devices for measuring physical properties of materials.

2. Please be aware that if your total possession limits for americium-241 (Am-241), cesium-137 (Cs-137) and/or californium-252 (Cf-252) exceed the threshold values (16 curies for Am-241, 27 curies for Cs-137, and 5.4 curies for Cf-252) or exceed the unity rule, we will add a condition to your license which will compel you to implement the requirements in the security order for increased controls (Order) as indicated in the NRC web site at the following location, <http://www.nrc.gov/reading-rm/doc-collections/enforcement/security/index.html>. You may opt to install barriers that would segregate the material and not implement the Increased Controls. The use of barriers is discussed in several questions and answers (Q&As) which are posted on the same security web page.

The Sealed Source and Device Registrations (SSDR) you provided in Item 5 of your renewal application for the Troxler Models 3217, 3218 and 4350 are not correct. You may request a copy of the most current registrations from the gauge manufacturer.

In item 1 of your renewal application dated March 28, 2007, you make reference to an attached drawing of your proposed permanent storage room. We did not receive a copy of this drawing in this correspondence. The drawing was previously received in your January 30, 2007 amendment request which is now combined with this renewal action. Please note that you are not required to provide such a drawing. In the future, please refrain from providing a floor diagram unless specifically requested by the NRC or Agreement State.

Current NRC regulations and guidance are included on the NRC's website at [www.nrc.gov](http://www.nrc.gov); select **Nuclear Materials; Medical, Industrial, and Academic Uses of Nuclear Material**; then **Regulations, Guidance and Communications**. Or you may obtain these documents by contacting the Government Printing Office (GPO) toll-free at 1-888-293-6498. The GPO is open from 7:00 a.m. to 9:00 p.m. EST, Monday through Friday (except Federal holidays).

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We will continue our review upon receipt of this information. Please reply to my attention at the Region I Office and refer to Mail Control No. 140064. If you have any technical questions regarding this deficiency letter, please call me at (610) 337-5251.

In order to continue prompt review of your application, we request that you submit your response to this letter within 30 calendar days from the date of this letter.

Sincerely,

***Original signed by Kathy Dolce Modes***

Kathy Dolce Modes  
Health Physicist  
Materials Security and Industrial Branch  
Division of Nuclear Materials Safety

cc:  
Mark R. Brashear, Radiation Safety Officer

B. Milhalcin  
Pennsylvania Soil and Rock, Inc.

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**SUNSI Review Complete: KModes**

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