



Ingram Engineering Services, Inc.
Chadd W. Ingram, P.E., S.E.O.
1015 Squires Drive West Chester PA 19382

P-2

November 13, 2007, Amended 12-14-07

Control # 141350

Licensing Assistance Team

Division of Nuclear Materials Safety

U.S. Nuclear Materials Commission, Region I

475 Allendale Road

King of Prussia, PA 19406-1415 Attn: Jenny Johansen via fax @ 610.337-5269

37-31287-01
03037582

Items #5- #11 from NRC Form 313:

#5:

- The Troxler model 3340 Nuclear Density Gauge (portable gage) possess less than 3.7×10^6 gigabecquerels (100,000 curies) of cesium-137 or 3.7×10^3 gigabecquerels (100 curies) of americium-241 or californium-252.
- The Troxler model 3440 portable gauge is registered as an approved sealed source or device by NRC or an Agreement State. IES requests permission to retain a maximum of 2 Troxler model no. 3440 portable gauges.
- The activity per source will not exceed the maximum activity listed on the approved certificate of registration issued by NRC or by an Agreement State.

#6:

- No response is required.

#7:

- The Troxler portable gauge shall be used "to measure physical properties of materials" such as soil (density and moisture) and Bituminous material germane to geotechnical engineering practices only.
- The Proposed RSO (Radiation Safety Officer) is Gary D. Ingram. Gary's address is 1126 Laurel Drive West Chester, PA 19380. Gary's telephone number is 484-995-5680.
- "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, Revision 1, 'Consolidated Guidance about Materials Licenses: Program-Specific Guidance about Portable Gauge Licenses,' dated November 2001"; and Before being named as the **RSO**, future **RSOs** 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

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NMSS/RGN1 MATERIALS-002

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NUREG-1556, Vol. 1, Revision 1, 'Consolidated Guidance about Materials Licenses: Program-Specific Guidance about Portable Gauge Licenses,' dated November 2001."

- "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, Revision 1, 'Consolidated Guidance about Materials Licenses: Program-Specific Guidance about Portable Gauge Licenses,' dated November 2001."

#9: No response is required.

#10: Radiation:

- Ingram Engineering Services, Inc. shall review the content and implementation of their radiation protection programs annually to ensure the following:

Compliance with NRC and *DOT* regulations, and the terms and conditions of the license;

Occupational doses and doses to members of the public are as low as reasonably achievable (*ALARA*) (*10 CFR 20.1101*); and

Records of audits and other reviews of program content are maintained for 3 years.

- Ingram Engineering Services, Inc. shall do the following:

Notify NRC, in writing, within 60 days, when principal activities have not been conducted for a period of 24 months or a decision is made to permanently cease licensed activities.

Certify the disposition of licensed materials by submission of *NRC Form 314*, "Certificate of Disposition of Materials," available from NRC upon request.

Before a license is terminated, send the records important to decommissioning (as required by *10 CFR 30.35(g)*) to the appropriate NRC regional office. If licensed activities are transferred or assigned in accordance with *10 CFR 30.34(b)*, transfer records important to decommissioning to the new licensee.

- "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, Revision 1, 'Consolidated Guidance about Materials Licenses: Program-Specific Guidance about Portable Gauge Licenses,' dated November 2001, in the event of an incident."
- "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."

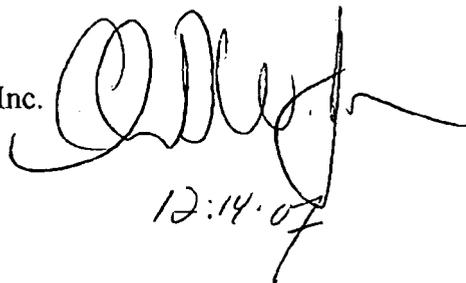


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- we will maintain, for inspection by NRC, documentation demonstrating that unmonitored individuals are not likely to receive, in one year, a radiation dose in excess of 10 percent of the allowable limits in 10 CFR Part 20 or we will provide dosimetry processed and evaluated by a *NVLAP*-approved processor that is exchanged at a frequency recommended by the processor.
 - We understand inspections shall be made germane to storage. Storage shall be made outside of occupied areas.
 - We will implement and maintain the operating and emergency procedures in *Appendix H* of NUREG-1556, Vol. 1, Revision 1, 'Consolidated Guidance about Materials Licenses: Program-Specific Guidance about Portable Gauge Licenses,' dated November 2001 and provide copies of these procedures to all gauge users and at each job site.
 - 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 to 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.
 - We will implement and maintain procedures for routine maintenance of our gauges according to each manufacturer's recommendations and instructions.
 - WE understand transportation of the portable gauge shall be made IN ACCORDANCE WITH NRC and DOT regulations.
11. Gauge Transfer: We do not need to provide a response to this item but shall comport to NRC and DOT requirements.

Thank you for your consideration to the above. Please contact me immediately should additional information be required to obtain approval/license to purchase a portable nuclear density gauge and commence training course application to establish a RSO.

Best Regards,
Chadd W. Ingram, P.E.
(DE, MD, NJ, PA), S.E.O.
President & CEO
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