Taylor Engineering, Inc.

Civil Design and Land Planning

March 24, 2008

Nuclear Materials Licensing Branch
U.S. Nuclear Regulatory Commission, Region IV
611 Ryan Plaza Drive, Suite 400
Arlington, TX 76011-4005

RE: **RSO Taylor Engineering**

Dear Whomever it may concern:

This letter is to inform you that John Johnson is no longer our Radiation Safety Officer and that Scott Busch will be taking over his duties as RSO for Taylor Engineering.

If you should have any concerns please feel free to call either Scott or myself at (509) 328-3371.

Sincerely,

TAYLOR ENGINEERING, INC.

Mark Aronson

Mark Aronson, P.E.
Principal

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Pullman, WA

106 W. Mission Ave. • Spokane, WA 99201-2345 • (509) 328-3371
FAX (509) 328-8224 • E-MAIL spokane@taylorengr.com

Coeur d'Alene, ID

Taylor Engineering, Inc.

Civil Design and Land Planning

April 8, 2008

Nuclear Materials Licensing Branch
U.S. Nuclear Regulatory Commission, Region IV
611 Ryan Plaza Drive, Suite 400
Arlington, TX 76011-4005

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ACCEPTANCE REVIEW MEMO (ARM)

Licensee:	Taylor Engineering, Inc.	**License No.:** 46-29250-01	
Docket No.:	030-37404	**Mail Control No.:** 471770	
Type of Action:	Amend	**Date of Requested Action:** 03-24-08	
Reviewer Assigned:	Rachel Browder	**ARM reviewer(s):** Torres	

Response	Deficiencies Noted During Acceptance Review
	[ ] Open ended possession limits. Submit inventory. Limit possession. [ ] Submit copies of latest leak test results. [ ] Add IC L.C./Fingerprint LC, add SUNSI markings to license. [ ] Confirm with licensee if they have NARM material.
	Request training certificate as user or RSO for Mr. Scott Busch.

Note: Application dtd 1/29/07 committed to TRing prior to being named RSO

Reviewer's Initials: _____ **Date:** RBrowder 4/23/08

☐Yes ☐No Request for unrestricted release Group 2 or >. Consult with Bravo Branch.

☐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 HP's Initials: _____ **Date:** _____

SUNSI Screening according to RIS 2005-31

☐Yes ☐No **Sensitive and Non-Publicly Available** if <u>any</u> 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 HP's Initials: HTC **Date:** APR 16 2008

Checklist to Ensure That Radioactive Material Will Be Used as Intended

Applicant Information: **Control No.** 471770

Name: Taylor Engineering, Inc.	Type of Request: Amend Program Code(s): 03121
Location: WA	License No.: 46-29250-01 Docket No.: 030-37404

STEP 1, ITEM A - INITIAL SCREENING

Instructions for Step 1: Complete Step 1 for all applications. If Step 1, Items A and B, are "YES" then do not complete Step 2. Sign and date the completed form and add it to ADAMS as Non-Sensitive and Non-Publicly Available. If a "NO" response is indicated for Item A or Item B, add the completed form to ADAMS as Sensitive and Non-Publicly Available, and complete Step 2 (Additional Screening). If the type of use is subject to a Security Order, complete Step 3, Item A, without delay. If the additional requirements for increased controls will be applied or voided, complete Step 3, Item B, without delay.	YES or NO
A. The applicant is a known entity or a licensee transferring control to a known entity. This determination has been made using the screening criteria in Worksheet A below.	Yes

Worksheet A

Instructions for Worksheet A: Answer each of the 6 questions below by placing a "Yes", "No", or "NA" response in the column on the right. Best practices for a reviewer are provided after each of the questions. If the answer to **any** of the 6 questions is "Yes" then indicate "Yes" in Step 1, Item A, above. If the answers to all of the 6 questions is "No" then indicate "No" in Step 1, Item A, above. **NOTE** - If the reviewer has personal knowledge of the applicant's veracity, this can be taken into account in responding to any questions. For example, if the applicant's management and/or RSO have been associated with a current or previous NRC or Agreement State license, then the applicant may be considered as a known entity.	YES, NO, or NA
1. **Does the applicant have a current Agreement State or NRC license?** The reviewer should 1) confirm that a valid license/registration/authorization exists for the applicant; and 2) compare the current license to the application to verify that the application represents a reasonable expansion of the licensee's operation (i.e., medical facility adding a gamma knife or an Agreement State licensee obtaining an NRC license in order to work in NRC jurisdiction without filing reciprocity).	Yes
2. **Does the applicant have a current Agreement State or NRC license at another location and the new application represents the addition of a new facility within the scope of the licensee's core business?** The reviewer should contact the appropriate licensing authority to confirm that a valid license/registration/authorization exists for the applicant and the corporate office of the licensee to verify that it has knowledge of and approves of the new application.	
3. **Does the applicant have a current State or Federal government license, registration, authorization, etc., for other operations within the scope of its proposed license activities?** (e.g., a company authorized by a State for mining that is now requesting authorization to use fixed gauges). The reviewer should contact the appropriate government office to confirm that the license, registration, authorization, etc., is valid; and the applicant's corporate office to confirm that it has knowledge of and approves of the new application to possess radioactive materials.	
4. **Is the applicant a local, State or Federal government agency?** The reviewer should contact the local, State or Federal government office to confirm that the applicant is a government entity.	
5. **Does the application only involve the relocation of an existing licensee, or its mailing address, to another State?** This includes new licenses created from existing licenses listing locations in multiple States, in preparation for transfer of licenses to States that will shortly sign an Agreement with the NRC.	
6. **Is the application only the result of a licensee failing to submit a renewal application in a timely manner?**	

STEP 1, ITEM B - INITIAL SCREENING CONTINUED

B.	The applicant is requesting certain radionuclides and quantities that are less than the Risk Significant Quantity (TBq) values in Worksheet B, below, as "highlighted" by the reviewer, or is currently subject to a security order or additional requirements for increased controls. If "Yes", there is no need to proceed further.	N/A

Worksheet B - 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[1])	Risk Significant Quantity (Ci[1])	Radionuclide	Risk Significant Quantity (TBq[1])	Risk Significant Quantity (Ci[1])
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[2]	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

[1] The primary values are TBq. The curie (Ci) values are for informational purposes only.
[2] 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 were completed. **NOTE–If an amendment of an existing license is being requested, the calculations will include the previously authorized quantities for the radionuclide(s).**	Yes , No, or Not Applicable (NA)
Total Activity–multiple activities are requested for a single radionuclide and the sum of the activities is less than the Risk Significant Quantity (TBq) for the radionuclide.	
Unity Rule-multiple radionuclides are requested and the sum of the ratios is less than 1.0, 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: APR 16 2008

License Reviewer and Date

BETWEEN:

License Fee Management Branch, ARM
and
Regional Licensing Sections

(FOR LFMS USE)
INFORMATION FROM LTS

Program Code: 03121
Status Code: 0
Fee Category: 3P
Exp. Date: 20170228
Fee Comments: _____
Decom Fin Assur Reqd: N

LICENSE FEE TRANSMITTAL

A. REGION

1. APPLICATION ATTACHED
   Applicant/Licensee: TAYLOR ENGINEERING INC
   Received Date: 20080328
   Docket No: 3037404
   Control No.: 471770
   License No.: 46-29250-01
   Action Type: Amendment

2. FEE ATTACHED
   Amount: ____
   Check No.: ____

3. COMMENTS

Signed Colleen Murnahan
Date 4-15-08

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 _____