



FACSIMILE

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Date: April 13, 2009 **Project No.**

To: Mr. Loren Hueter

Company: NRC

Telecopier No.: 630-515-1078

From: Josh Gottschall **e-mail:** josh.gottschall@wilcox.us

Regarding: NRC license amendment

No. of Pages: 9 (including cover)

Hardcopy: Yes No

Comments:
Mr. Hueter,
Feel free to contact me if you have any questions.

cc:

Fax Number:

Wilcox Professional Services, LLC - An ISO 9001:2000 Certified Company

If you have any problems receiving this fax, please contact our office.



An ISO 9001:2000
Certified Company

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Cadillac, MI 49601
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continuously improving our
quality of service to meet
and exceed our
clients' expectations.

April 10, 2009

Mr. Loren J. Hueter
Nuclear Regulatory Commission, Region III
2443 Warrenville Road, Suite 210
Lisle, Illinois 60532-4352

RE: Amendment of License No. 21-23314-01

Dear Mr. Hueter ,

Per our phone conversation on April 9, 2009, Wilcox Associates Inc. (Wilcox) is providing additional information for our amendment. As discussed we do not intend to store any materials at our Farmington Location and that can be removed from our license. I will address each item included in your faxed request for additional information.

- 1. Please confirm that all gauges formerly stored at 37867 Interchange Dr. Farmington Hills, MI have been transferred to other of your facility locations.**

Wilcox confirms that all gauges formerly store at 37867 Interchange Dr. Farmington Hills, Mi has been transferred to our Cadillac, Mi location.

- 2. Please provide the date of transfer of each gauge and a copy of the leak test record, current as the date of transfer, which confirms the non-leaking status of the source(s) in each gauge.**

The transfer date back to Cadillac, Mi location was 12-12-08 and the leak test is attached that was current during that timeframe.

- 3. Please confirm that no leaking sealed sources were ever stored/ used at 37867 interchange Drive, Farmington Hills, Mi.**

All leak tests performed on the gauges stored at our Farmington Hills location have always been less than 185Bq (0.005uCi).

- 4. Please confirm that no gauges /licensed material remain at 37867 Interchange Dr. Farmington Hills, Mi.**

Wilcox confirms that there are no gauges/licensed material at 37867 Interchange Drive, Farmington Hills, Mi.

- 5. NRC policy now requires that total possession limit be placed on the license for each radionuclide authorized on the license. Please provide this information for both CS-137 and Am-241.**

Wilcox currently has (26gauges) 208mCi of Cs-137 and (25gauges)1000mCi of Am-241 in it's possession of 26 gauges. One of our gauges is a 4640 which only has CS-137. We would like the limit to be 216mCi of Cs-137 and 1040 mCi of Am241Be.



6. You requested to adopt the more recent version of NUREG-1556 Vol. 1, Rev1 issued November 2001. In order to accomplish this, please refer to Appendix B(Suggested Format for Providing Information Requested in Items 5 through 11) of the Rev. 1 document and provide updated information for items 7 through 11 only for our review.

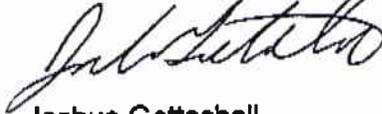
Completed Appendix B is attached with our Radiation Safety Program.

7. License Condition 19 will be updated to address the required minimum two independent physical controls to secure portable gauges from unauthorized removal whenever a gauge is not under the control and constant surveillance if the licensee.

Wilcox understands this condition and is in compliance with it.

I hope this information is satisfactory. If you need additional information, please contact me.

Sincerely,
WILCOX PROFESSIONAL SERVICES, LLC



Joshua Gottschall
Project Manager/ Radiation Safety Officer



Troxler Electronic Laboratories, Inc.

3008 Cornwallis Rd., P.O. Box 12057
 Research Triangle Park, NC 27709
 Tel: (877) 876-9537 Fax: (919) 485-2250
 License: NC 032-0182-1

JOSH GOTTSCHALL
 WILCOX ASSOCIATES, INC.
 ONE MADISON AVE.
 CADILLAC, MI 49601

LEAK TEST CERTIFICATE

DEVICE:

Model: 3440 Serial No: 20675

SEALED SOURCES:

Serial No.	Measure Date	Nuclide	GBq	mCi
47-16165	12/16/1991	AM-241:BE	1.48	40
75-2060	09/16/1991	CS-137	0.296	8

LEAK TEST ANALYSIS:

Sample collected on: 09/05/2008
 Sample analyzed on: 09/11/2008 at 9:10:00 AM
 Analyzed by: Douglas Kjos

	ALPHA	BETA-GAMMA
Conversion factor (cpm/Bq)	1.24E+01	2.01E+01
Background measurement (cpm)	1	26
Sample measurement (cpm)	0	25
Activity (Bq)	< MDA	< MDA
Min. Detectable Activity (Bq)	5.1E-01	1.3E+00

This certifies that the leak test results are:

Less than 185 Bq (0.005 uCi) Greater than 185 Bq (0.005 uCi)

D. Kjos
 9-17-08

APPENDIX B

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

Item No. And Title	Suggested Response	Yes	Alternative Procedures Attached
7. INDIVIDUAL(S) RESPONSIBLE FOR RADIATION SAFETY PROGRAM AND THEIR TRAINING AND EXPERIENCE - RADIATION SAFETY OFFICER Name: _____	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.	<input checked="" type="checkbox"/>	<input type="checkbox"/>
8. TRAINING FOR INDIVIDUALS WORKING IN OR FREQUENTING RESTRICTED AREAS	Before using licensed materials, authorized users will have successfully completed one of the training course 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.	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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	
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	
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 when the licensee ceases operation, NRC Form 314 must be submitted.	Need Not Be Submitted With Application	
10. RADIATION SAFETY PROGRAM - SURVEY INSTRUMENTS	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.	<input checked="" type="checkbox"/>	<input type="checkbox"/>

APPENDIX B

Item No. And Title	Suggested Response	Yes	Alternative Procedures Attached
10. RADIATION SAFETY PROGRAM - MATERIAL RECEIPT AND ACCOUNTABILITY	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.	<input type="checkbox"/>	<input type="checkbox"/>
10. RADIATION SAFETY PROGRAM - OCCUPATIONAL DOSIMETRY	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.	<input checked="" type="checkbox"/>	<input type="checkbox"/>
10. RADIATION SAFETY PROGRAM - PUBLIC DOSE	The applicant is <i>not</i> required to submit a response to the public dose section during the licensing phase. This matter will be examined during an inspection.	Need Not Be Submitted With Application	
10. RADIATION SAFETY PROGRAM - OPERATING AND 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;">OR</p> <p>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.</p>	<input type="checkbox"/> <input type="checkbox"/>	<input checked="" type="checkbox"/>
10. RADIATION SAFETY PROGRAM - LEAK TEST	Leak tests will be performed at intervals approved by 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 for 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.	<input checked="" type="checkbox"/>	<input type="checkbox"/> The information in Appendix J supporting a request to perform leak testing and sample analysis is attached.

APPENDIX B

Item No. And Title	Suggested Response	Yes	Alternative Procedures Attached
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><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><input checked="" type="checkbox"/></p> <p><input checked="" type="checkbox"/></p>	<p><input type="checkbox"/></p> <p><input type="checkbox"/></p> <p>The information listed in Appendix G supporting a request to perform non-routine maintenance in-house is attached.</p>
10. RADIATION SAFETY PROGRAM - TRANSPORTATION	The applicant is <i>not</i> required to submit its response to transportation during the licensing process. However, this issue will be reviewed during inspection.		Need Not Be Submitted With Application
11. WASTE MANAGEMENT - GAUGE DISPOSAL AND TRANSFER	The applicant is <i>not</i> required to submit a response to waste management during the licensing process. However, the licensee should develop, implement, and maintain gauge transfer and disposal procedures in its radiation protection program.		Need Not Be Submitted With Application

**WILCOX ASSOCIATES, INC.
STANDARD OPERATING PROCEDURES
NUCLEAR DENSITY GAUGES**

Operating Procedures

1. Before removing the gauge from its place of storage, check to make sure that the gauge source rod is in the shielded, locked position, then lock the transport case if possible.
2. Sign the gauge out in the log book including the date(s) of use, name(s) of authorized users who will be responsible for the gauge, and the temporary jobsite(s) where the gauge will be used.
3. Never leave the gauge unattended while in your custody.
4. Follow all applicable Department of Transportation (DOT) requirements when transporting the gauge.
5. Do not touch the source rod with your fingers, hands, or any part of your body, and always make sure the source rod is in the shielded position after each measurement is made.
6. Always wear your assigned thermoluminescent dosimeter (TLD) or film badge when using the gauge.
7. Never wear another person's TLD or film badge.
8. Never store your TLD or film badge near the gauge.
9. Always keep unauthorized persons away from the area where the gauge is to be used.
10. Always maintain constant surveillance and immediate control of the gauge when it is not in storage.
11. To assist operators of heavy equipment in seeing the gauges at construction sites, always "stake and flag" each gauge, being sure that the flags are tall enough to be seen by heavy equipment operators.
12. Never look under the gauge when the source rod is being lowered into the ground.
13. After each measurement, always return the source to the shielded position and lock it there.
14. When the gauge is not in use at a temporary jobsite, place the gauge in secured storage location (e.g., locked in the trunk of a car or locked in a storage shed).
15. Return the gauge to its proper storage location at the end of the work shift.
16. When the gauge is returned to storage, so indicate in the source log.

**The controlled current copy of this document must be black text printed on fluorescent paper.
Any photocopy of this document is obsolete and should be considered for reference only.**

**WILCOX ASSOCIATES, INC.
EMERGENCY RESPONSE PROCEDURES – MICHIGAN'S LOWER PENINSULA
NUCLEAR DENSITY GAUGES**

If the source fails to return to the shielded position (e.g. as a result of being damaged) or if any other emergency or unusual situation arises (e.g. the gauge is struck by a moving vehicle, is dropped, or is in a vehicle involved in an accident):

1. Immediately secure the area around the gauge.
2. Prevent unauthorized personnel from entering the secured area.
3. If heavy equipment is involved, detain the equipment until it is determined there is no contamination present.
4. Notify Radiation Safety Officer and/or Management of situation. If local staff is unavailable, contact Cadillac personnel.

Cadillac Office

	<u>Work Phone</u>	<u>Home Phone</u>	<u>Cell Phone</u>
Joshua Gottschall, RSO	231-775-7755	231-779-1408	231-846-0986
Michael Conners, RSO	231-775-7755	231-946-6968	231-878-2534
Dean Geers, Project Director	231-775-7755	231-775-8518	231-878-2522

Alpena Office

Jeffrey Allen, RSO	989-356-6375	989-471-8482	989-657-2433
Daniel Kibbe, Project Director	989-356-6375	989-727-2913	989-657-0987

Grand Rapids Office

Michael O'Sullivan, RSO	616-891-0800	616-536-2064	616-893-7325
Troy Schreur, Project Director	616-891-0800	616-669-5236	616-262-2417

Farmington Hills Office

Andrew André, RSO	248-478-3690	810-695-1795	248-798-9302
Robert Hufnagel, Vice President	248-478-3690	734-761-9522	248-320-9600

Saginaw Office

Jack Niemi, RSO	989-752-6500	989-753-8364	989-213-4479
John Morey, Project Coord.	989-752-6500	989-791-1836	989-213-4553

5. Notify Emergency Response Team - Environmental Safety & Health (ESH) as needed (if determined by management) or if no one in Step 4 is available.

Name

<u>Name</u>	<u>Work Phone</u>	<u>Home Phone</u>	<u>Cell Phone</u>
Bill Pierce	231-258-8014	231-946-1224	231-384-1344
Ken Pierce	517-622-1890	517-627-8848	517-282-5950

6. Follow the directions provided by personnel contacted in Step 4 and Step 5 above.
7. **Reminder to Licensee Management:**
 - a. Arrange for a survey to be conducted, as soon as possible, by ESH.
 - b. Make necessary notifications to local authorities as well as the NRC, as required. (Even if not required to do so, you may report ANY incident to the NRC by calling NRC's Emergency Operations Center at 301-816-5100, which is staffed 24 hours a day and accepts collect calls. NRC notification is required when gauges containing licensed material are lost or stolen, when gauges are damaged or involved in incidents that result in doses in excess of 10 CFR 20.2203 limits. NRC's July 1, 1993, memorandum, available from your RSO, provides additional guidance.)
 - c. Timeliness of reports to the NRC needs to be considered.
 - d. Reporting requirements are found in 10 CFR 20.2201-2203 and 10 CFR 30.50.

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