

L.R. Kimball

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A CDI Company

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TO: LICENSING ASSISTANCE TEAM	FROM: WILLIAM STENGER
COMPANY: NRC	DATE: 3-23-11
PROJECT NUMBER: —	PROJECT NAME: —
FAX NUMBER: 610-337-5269	TOTAL NO. OF PAGES INCLUDING COVER: 18
RE: LICENSE 37-17717-02 RENEWAL	FAXED BY:

- URGENT
 FOR REVIEW
 PLEASE COMMENT
 PLEASE REPLY

03016053

NOTES/COMMENTS:

ADDITIONAL INFORMATION - RENEWAL OF LICENSE # 37-17717-02
FOR CDI- INFRASTRUCTURE, LLC D.B.A. L.R. KIMBALL.

PLEASE FEEL FREE TO CONTACT ME IF YOU HAVE ANY QUESTIONS OR
REQUIRE ADDITIONAL INFORMATION. THANKS!

BILL. STENGER@LRKIMBALL.COM
814-472-7700 ext. 1338

574723
NMSS/RGN1 MATERIALS-002

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ADDITIONAL INFORMATION - RENEWAL OF LICENSE # 37-17717-02
CDI - INFRASTRUCTURE, LLC D.B.A. L.R. KIMBALL

Appendix B

**Suggested Format for Providing
Information Requested in Items 5
through 11**

APPENDIX B

ITEMS 5 AND 6: MATERIALS TO BE POSSESSED AND PROPOSED USES

Yes	No	Radioisotope	Manufacturer or Distributor Model No.	Quantity	Use As Listed on SSD Certificate	Specify Other Uses Not Listed on SSD Certificate
		Cesium-137	Sealed source manufacturer or distributor and model number: Device manufacturer or distributor and model number:	Not to exceed either the maximum activity per source or maximum activity per device as specified in Sealed Source and Device Registration Certificate	Yes <input checked="" type="checkbox"/> Specific description of the gauge use: <u>NUCLEAR</u> <u>DENSITY</u> <u>TESTING</u>	<input type="checkbox"/> Not applicable <input type="checkbox"/> Uses are: (Submit safety analysis supporting safe use)
		Americium-241	Sealed source manufacturer or distributor and model number: Device manufacturer or distributor and model number:	Not to exceed either the maximum activity per source or maximum activity per device as specified in Sealed Source and Device Registration Certificate	Yes <input checked="" type="checkbox"/> Specific description of the gauge use: <u>NUCLEAR</u> <u>DENSITY</u> <u>TESTING</u>	<input type="checkbox"/> Not applicable <input type="checkbox"/> Uses are: (Submit safety analysis supporting safe use)

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Yes	No	Radioisotope	Manufacturer or Distributor Model No.	Quantity	Use As Listed on SSD Certificate	Specify Other Uses Not Listed on SSD Certificate
		Californium-252	Sealed source manufacturer or distributor and model number: _____ Device manufacturer or distributor and model number: _____	Not to exceed either the maximum activity per source or maximum activity per device as specified in Sealed Source and Device Registration Certificate	Yes <input type="checkbox"/> Specific description of the gauge use: _____ _____ _____	<input type="checkbox"/> Not applicable _____ <input type="checkbox"/> Uses are: _____ (Submit safety analysis supporting safe use)
		Other Isotope (Specify):	Sealed source manufacturer or distributor and model number: _____ Device manufacturer or distributor and model number: _____	Not to exceed either the maximum activity per source or maximum activity per device as specified in Sealed Source and Device Registration Certificate	Yes <input type="checkbox"/> Specific description of the gauge use: _____ _____	<input type="checkbox"/> Not applicable _____ <input type="checkbox"/> Uses are: _____ (Submit safety analysis supporting safe use)
<i>Financial Assurance Required and Evidence of Financial Assurance Provided</i>						

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
<p>7. INDIVIDUAL(S) RESPONSIBLE FOR RADIATION SAFETY PROGRAM AND THEIR TRAINING AND EXPERIENCE – RADIATION SAFETY OFFICER</p> <p>Name: _____</p>	<p>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.</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>8. TRAINING FOR INDIVIDUALS WORKING IN OR FREQUENTING RESTRICTED AREAS</p>	<p>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.</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>9. FACILITIES AND EQUIPMENT</p>	<p>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."</p>	<p>Separate Item 9 Response Need Not Be Submitted With Application</p>	
<p>10. RADIATION SAFETY PROGRAM – AUDIT PROGRAM</p>	<p>The applicant is <i>not</i> required to, and should not, submit its audit program to NRC for review during the licensing phase.</p>	<p>Need Not Be Submitted With Application</p>	
<p>10. RADIATION SAFETY PROGRAM – TERMINATION OF ACTIVITIES</p>	<p>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.</p>	<p>Need Not Be Submitted With Application</p>	
<p>10. RADIATION SAFETY PROGRAM – SURVEY INSTRUMENTS</p>	<p>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.</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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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.	☑	☐
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.	☑	☐
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	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. OR 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.	☐ ☑	☐
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.	☑	☐ The information in Appendix J supporting a request to perform leak testing and sample analysis is attached.

Appendix M

**Review Checklist for Portable Gauge
Application**

APPENDIX M

ITEM 1: ACTION TYPE

<u>ACTION TYPE:</u> <input type="checkbox"/> New <input type="checkbox"/> Amendment <input checked="" type="checkbox"/> Renewal	<u>ADMINISTRATIVE REVIEW:</u> <input type="checkbox"/> Current Guidance Used <input type="checkbox"/> References in Application Based On Current Regulations
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ITEM 2: LEGAL IDENTITY

NAME:	CDI - INFRASTRUCTURE, LLC D.B.A. L.R. KIMBALL
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ITEMS 2 AND 3: ADDRESS

STORAGE & LOCATION OF USE ①	MAILING ADDRESS ②
Temporary Job Sites <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	

ITEM 4: PERSON TO BE CONTACTED ABOUT THIS APPLICATION

CONTACT PERSON:	William E. Stenger
TELEPHONE:	814-472-7700 EXT. 1338

- ① GAUGES WILL BE STORED AT L.R. KIMBALL GEOTECHNICAL SERVICES BLDG., 725 WEST TRIUMPH STREET, EBENSBURG, PA 15931, WHEN NOT IN USE.
- ② CORRESPONDENCE ASSOCIATED WITH GAUGES / LICENSURE SHOULD BE DIRECTED TO L.R. KIMBALL, ATTN: WILLIAM STENGER, 615 W. HIGHLAND AVENUE, EBENSBURG, PA 15931

APPENDIX M

ITEMS 5 AND 6: MATERIALS TO BE POSSESSED AND USES

Yes	No	Radioisotope	Model No.	Quantity	Use As Listed on SSD Certificate	Specify Other Uses Not Listed on SSD Certificate
		Cesium-137	Sealed source manufacturer or distributor and model number: ----- Device manufacturer or distributor and model number: -----	Not to exceed either the maximum activity per source or maximum activity per device as specified in Scaled Source and Device Registration (SSDR) Certificate	Yes <input checked="" type="checkbox"/> Specific description of the gauge use: <u>NUCLEAR DENSITY TESTING</u>	<input type="checkbox"/> Not applicable <input type="checkbox"/> Uses are: -----
		Americium-241	Sealed source manufacturer or distributor and model number: ----- Device manufacturer or distributor and model number: -----	Not to exceed either the maximum activity per source or maximum activity per device as specified in SSDR Certificate	Yes <input checked="" type="checkbox"/> Specific description of the gauge use: <u>NUCLEAR DENSITY TESTING</u>	<input type="checkbox"/> Not applicable <input type="checkbox"/> Uses are: -----
		Californium-252	Sealed source manufacturer or distributor and model number: ----- Device manufacturer or distributor and model number: -----	Not to exceed either the maximum activity per source or maximum activity per device as specified in SSDR Certificate	Yes <input type="checkbox"/> Specific description of the gauge use: ----- ----- -----	<input type="checkbox"/> Not applicable <input type="checkbox"/> Uses are: -----

APPENDIX M

Yes	No	Radioisotope	Model No.	Quantity	Use As Listed on SSD Certificate	Specify Other Uses Not Listed on SSD Certificate
		Other Isotope (Specify):	Sealed source manufacturer or distributor and model number: Device manufacturer or distributor and model number:	Not to exceed either the maximum activity per source or maximum activity per device as specified in SSDR Certificate	Yes <input type="checkbox"/> Specific description of the gauge use: _____ _____ _____	<input type="checkbox"/> Not applicable <input type="checkbox"/> Uses are: _____ _____
<i>Financial Assurance Required and Evidence of Financial Assurance Provided</i>						

APPENDIX M

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

ITEM NUMBER AND TITLE	SUGGESTED RESPONSE	APPLICANT'S RESPONSE			
		YES	NO	OTHER	
				YES	NO
ITEM 7 INDIVIDUAL(S) RESPONSIBLE FOR RADIATION SAFETY PROGRAM AND THEIR TRAINING AND EXPERIENCE - RADIATION SAFETY OFFICER NAME <u>WILLIAM STENGER</u>	<p>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.</p> <p><i>Optional Response</i> Criteria for Acceptable Training Courses for Radiation Safety Officer/Portable Gauge Users</p> <p>Course Content</p> <ul style="list-style-type: none"> 1.5 to 2 hours of radiation safety and regulatory requirements; 1.5 to 2 hours practical explanation of gauge theory and operation (including test runs). <p>Course Examination</p> <ul style="list-style-type: none"> 25- to 50-question written (closed book) test - 70 percent grade. <p>Course Instructor Qualifications</p> <ul style="list-style-type: none"> Bachelor's degree in a physical or life science or engineering with successful completion of both a portable gauge user course and 8-hour radiation safety course and 8 hours hands-on of experience with portable gauges. <p style="text-align: center;">OR</p>	YES			

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ITEM NUMBER AND TITLE	SUGGESTED RESPONSE	APPLICANT'S RESPONSE			
		YES	NO	OTHER	
				YES	NO
ITEM 7 (CONTINUED)	<ul style="list-style-type: none"> • An individual with the following training: <ul style="list-style-type: none"> — Successful completion of portable gauge user course. — Successful completion of 40-hour radiation safety course. — 30 hours of hands-on experience with portable gauges 				
ITEM 8 TRAINING FOR INDIVIDUALS WORKING IN OR FREQUENTING RESTRICTED AREAS	<p>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, Rev. 1, dated November 2001.</p> <p style="text-align: center;"><i>Optional Response</i></p> <p>Review optional response against criteria listed under Item 7.</p>	YES			
ITEM 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			
ITEM 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			
ITEM 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 or at the time the licensee ceases operations, NRC Form 314 must be submitted.	Need Not Be Submitted With An Individual With the Following Training			
ITEM 10 RADIATION SAFETY PROGRAM - INSTRUMENTS	<p>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, in the event of an incident.</p> <p style="text-align: center;"><i>Optional Response</i></p> <p>A radiation survey meter should satisfy the following criteria:</p> <ul style="list-style-type: none"> • Be capable of detecting gamma radiation; • Be checked for functionality before use. 	YES			

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ITEM NUMBER AND TITLE	SUGGESTED RESPONSE	APPLICANT'S RESPONSE			
		YES	NO	OTHER	
				YES	NO
ITEM 10 RADIATION SAFETY PROGRAM -- MATERIAL RECEIPT AND ACCOUNTABILITY	<p>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.</p> <p><i>Optional Response</i> Frequency and procedures to ensure no gauge is lost, stolen or misplaced, and if possession exceeds threshold, comply with financial assurance requirements in 10 CFR 30.35.</p>	YES			
ITEM 10 RADIATION SAFETY PROGRAM -- OCCUPATIONAL DOSIMETRY	<p>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 NRC-approved processor that is exchanged at a frequency recommended by the processor.</p> <p><i>Optional Response</i> Alternative response demonstrates compliance with 10 CFR Part 20 requirements.</p>	YES			
ITEM 10 RADIATION SAFETY PROGRAM -- PUBLIC DOSE	The applicant is <i>not</i> required to submit a response to public dose section during the licensing phase. This matter will be examined during an inspection.	Need Not Be Submitted With Application			

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ITEM NUMBER AND TITLE	SUGGESTED RESPONSE	APPLICANT'S RESPONSE			
		YES	NO	OTHER	
				YES	NO
ITEM 10 RADIATION SAFETY PROGRAM OPERATING & 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> <p style="text-align: center;"><i>Optional Response</i></p> <ul style="list-style-type: none"> • Instructions to use gauge and perform routine maintenance per manufacturer's recommendations and instructions; • Instructions to maintain security during storage and transportation; • Instructions to keep the gauge under control and immediate surveillance during use; • Steps to take to keep radiation exposures ALARA; • Steps to maintain accountability during use; • Steps to control access to damaged gauge; • Steps to take, and whom to contact, when a gauge has been damaged; • If gauges are used for measurements greater than 3 feet beneath the surface: use of surface casing or other procedures to ensure free movement of source in hole; instructions, procedures to retrieve a stuck source; NRC reporting requirements; • Copies provided to personnel and available at each job site. 	YES			

APPENDIX M

ITEM NUMBER AND TITLE	SUGGESTED RESPONSE	APPLICANT'S RESPONSE			
		YES	NO	OTHER	
				YES	NO
ITEM 10 RADIATION SAFETY PROGRAM LEAK TEST	<p>Leak tests will be performed at intervals approved by NRC or an Agreement State and will be specified in the SSDR 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.</p> <p><i>Optional Response</i> Provide the information in Appendix J supporting a request to perform leak testing and sample analysis:</p> <ul style="list-style-type: none"> Individual who will make the analysis; qualifications to make quantitative measurements; Leak test frequency as specified in the appropriate SSDR Sheet; How and where test samples taken; materials to be used; methods of handling samples to prevent or minimize exposure to personnel; Type of instrument(s) used, counting efficiency, and minimum levels of detection for each radionuclide. <p><i>Note: An instrument capable of making quantitative measurements should be used; hand-held survey meters will not normally be considered adequate for measurements.</i></p> <ul style="list-style-type: none"> Standard calibration sources including for each: the radionuclide, quantity, accuracy, and traceability to primary radiation standards; <p><i>Note: Accuracy of standards should be within ± 5 percent of the stated value and traceable to a primary radiation standard such as those maintained by the National Institutes of Standards and Technology (NIST).</i></p> <ul style="list-style-type: none"> Sample calculation to convert measurement data to becquerels (or microcuries); Instructions on actions, notifications regarding leaking source. 	YES			

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ITEM NUMBER AND TITLE	SUGGESTED RESPONSE	APPLICANT'S RESPONSE			
		YES	NO	OTHER	
				YES	NO
ITEM 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>Optional Response</i></p> <ul style="list-style-type: none"> • Considers ALARA; • Ensures gauge functions as designed; • Ensures source integrity not compromised. <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><i>Optional Response</i></p> <p>Provide the information listed in Appendix G supporting a request to perform non-routine maintenance in-house.</p> <ul style="list-style-type: none"> • Types of work to be performed; • Who will perform maintenance, training, experience, why competent; • Handling procedures: doses to public, personnel ALARA and regulatory limits; security; posting; manufacturing instructions and recommendations; • Use of whole-body and extremity monitoring or evaluation to demonstrate that individuals are not likely to receive greater than 10 percent of allowable limits; • Possess survey instrument (detects gamma radiation; range 1-50 mrem/hr; annual calibration w/point source at 2 points/scale; readings within ±20 percent; calibrated by NRC/Agreement State licensee; checked before use); • 10 CFR 20.1301 surveys (when and where instrument survey performed, records for 3 years). 	YES			

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ITEM NUMBER AND TITLE	SUGGESTED RESPONSE	APPLICANT'S RESPONSE			
		YES	NO	OTHER	
				YES	NO
ITEM 10 RADIATION SAFETY PROGRAM - TRANSPORTATION	The applicant is <i>not</i> required to submit a response to transportation section during the licensing process. However, this issue will be reviewed during inspection.	Need Not Be Submitted With Application			
ITEM 11 WASTE DISPOSAL - GAUGE DISPOSAL AND TRANSFER	The applicant is <i>not</i> required to submit a response to waste management section during the licensing process. However, the licensee should develop, implement, and maintain gauge transfer and disposal procedures in its radiation safety program.	Need Not Be Submitted With Application			