



## NIPPO CORPORATION

290 Chalan Padiron Haya, Route 15, Yigo, GU 96929 USA P.O. Box 22319, Barrigada, GU 96921  
Tel: (671) 653-7077 Fax: (671) 653-7707 <http://www.nippo-c.co.jp>

April 11, 2011

U.S. Nuclear Regulatory Commission, Region IV  
Division of Nuclear Materials Safety  
612 E. Lamar Boulevard, Suite 400  
Arlington, TX 76011-4125

Attention: Ms. Michelle Simmons  
Health Physicist

Subject: Docket Number: 03038414  
License Number: 56-29420-01  
Mail Control Number: 574333

Dear Ms. Simmons;

This is in response to your April 9<sup>th</sup>, 2011 email requesting for additional information in reference to our application for license dated January 27, 2011.

1. We will implement and maintain the operating, emergency, and security procedures described in the errata sheet to 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 (<http://www.nrc.gov/reading-rm/doc-collections/nuregs/staff/sr1556/v1/r1/apph-errata.pdf>).
2. The following standard procedures will be implemented and maintained during and after working hours in order to meet the requirements of 10 CFR 30.34(i) – Two tangible physical controls.
  - a) During working hours at the jobsite and during transportation to and from the jobsite:

The portable gauge operator shall maintain constant control and surveillance of the portable gauge at all times when in use. When not in use and during transportation where there is a possibility that the gauge operator may lose constant control and surveillance of the portable gauge, the portable gauge shall be locked in the SAFE position inside the double padlocked transportation case. The locked transportation case shall be put in a secured transportation vehicle. Transportation vehicle that will be used can be a pickup truck, a car, or an SUV.

In a pickup truck, the locked transportation case containing the locked portable gauge will be put inside a metal box that is physically attached to the pickup bed and the box will be provided with two independent padlocks.

In case of a car, the locked transportation case containing the locked portable gauge will be put inside the locked trunk. A cable security restraint (one-piece cable web) will be

wrapped around the locked transportation case and be physically secured to the vehicle to prevent opening of the case or removal of the portable gauge without removal of the cable web.

In case of an SUV, the locked transportation case containing the locked portable gauge will be put inside the storage compartment of the SUV with all the SUV doors locked. A cable security restraint (one-piece cable web) will be wrapped around the transportation case and be physically secured to the vehicle to prevent opening of the case or removal of the portable gauge without removal of the cable web.

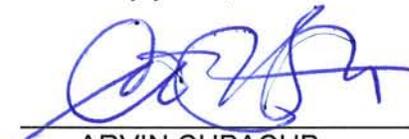
b) After working hours:

The locked transportation case containing the locked portable gauge will be stored inside a locked outdoor concrete storage shed inside Nippo's property or compound. Nippo's compound has a perimeter fence with a locked gate.

It is Nippo's policy that at the end of each day's use, the portable gauge shall be stored at its designated storage inside Nippo's property. But if for some reason in the future that the portable gauge can not be stored back to its designated storage, the locked transportation case containing the locked portable gauge will be stored inside a locked non-portable construction trailer at the job site. A cable security restraint (one-piece cable web) will be wrapped around the transportation case and be physically secured to a non-portable structure inside the trailer to prevent opening of the case or removal of the portable gauge without removal of the cable web.

Should you have any questions or need additional information, please contact us at Tel (671) 653-7077, Fax (671) 653-7707, or email: [mnakagawa@nippo-c.com](mailto:mnakagawa@nippo-c.com).

Sincerely yours,



---

ARVIN CUBACUB  
Radiation Safety Officer



---

MAKOTO NAKAGAWA  
General Manager