

Response to: Control # 574341

<p>NRC FORM 313 (8-1999) 10 CFR 30, 32, 33 34, 35, 36, 39 and 40</p> <p>U. S. NUCLEAR REGULATORY COMMISSION</p> <p>APPROVED BY OMB: NO. 3150-0120</p> <p>EXPIRES:08/31/2002</p>													
<p>Estimated burden per response to comply with this mandatory information collection request: 7.4 hours. Submittal of the application is necessary to determine that the applicant is qualified and that adequate procedures exist to protect the public health and safety. Send comments regarding burden estimate to the Records Management Branch (T-8 E6), U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001, or by internet e-mail to bjr1@nrc.gov, and to the Desk Officer, Office of Information and Regulatory Affairs, NEOB-10202, (3150-0120), Office of Management and Budget, Washington, DC 20503. If a means used to impose an information collection does not display a currently valid OMB control number, NRC may not conduct or sponsor, and a person is not required to respond to, the information collection.</p>													
<p>APPLICATION FOR MATERIAL LICENSE</p>													
<p>INSTRUCTIONS: SEE THE APPROPRIATE LICENSE APPLICATION GUIDE FOR DETAILED INSTRUCTIONS FOR COMPLETING APPLICATION. SEND TWO COPIES OF THE ENTIRE COMPLETED APPLICATION TO THE NRC OFFICE SPECIFIED BELOW.</p>													
<p>APPLICATION FOR DISTRIBUTION OF EXEMPT PRODUCTS FILE APPLICATIONS WITH: DIVISION OF INDUSTRIAL AND MEDICAL NUCLEAR SAFETY OFFICE OF NUCLEAR MATERIALS SAFETY AND SAFEGUARDS U. S. NUCLEAR REGULATORY COMMISSION WASHINGTON, DC 20555-0001</p> <p>ALL OTHER PERSONS FILE APPLICATIONS AS FOLLOWS: IF YOU ARE LOCATED IN: CONNECTICUT, DELAWARE, DISTRICT OF COLUMBIA, MAINE, MARYLAND, MASSACHUSETTS, NEW HAMPSHIRE, NEW JERSEY, NEW YORK, PENNSYLVANIA, RHODE ISLAND, OR VERMONT, SEND APPLICATIONS TO: LICENSING ASSISTANT SECTION NUCLEAR MATERIALS SAFETY BRANCH U. S. NUCLEAR REGULATORY COMMISSION REGION I 475 ALLENDALE ROAD KING OF PRUSSIA, PA 19406-1415</p> <p>ALABAMA, FLORIDA, GEORGIA, KENTUCKY, MISSISSIPPI, NORTH CAROLINA, PUERTO RICO, SOUTH CAROLINA, TENNESSEE, VIRGINIA, VIRGIN ISLANDS, OR WEST VIRGINIA, SEND APPLICATIONS TO: SAM NUNN ATLANTA FEDERAL CENTER U. S. NUCLEAR REGULATORY COMMISSION, REGION II 61 FORSYTH STREET, S.W., SUITE 23785 ATLANTA, GEORGIA 30303-8931</p>	<p>IF YOU ARE LOCATED IN: ILLINOIS, INDIANA, IOWA, MICHIGAN, MINNESOTA, MISSOURI, OHIO, OR WISCONSIN, SEND APPLICATIONS TO: MATERIALS LICENSING SECTION U. S. NUCLEAR REGULATORY COMMISSION, REGION III 801 WARRENVILLE RD. LISLE, IL 60532-4351</p> <p>ALASKA, ARIZONA, ARKANSAS, CALIFORNIA, COLORADO, HAWAII, IDAHO, KANSAS, LOUISIANA, MONTANA, NEBRASKA, NEVADA, NEW MEXICO, NORTH DAKOTA, OKLAHOMA, OREGON, PACIFIC TRUST TERRITORIES, SOUTH DAKOTA, TEXAS, UTAH, WASHINGTON, OR WYOMING, SEND APPLICATIONS TO: NUCLEAR MATERIALS LICENSING SECTION U. S. NUCLEAR REGULATORY COMMISSION, REGION IV 811 RYAN PLAZA DRIVE, SUITE 400 ARLINGTON, TX 76011-8064</p> <p>MS 16 G-2 03035611</p>												
<p>PERSONS LOCATED IN AGREEMENT STATES SEND APPLICATIONS TO THE U.S. NUCLEAR REGULATORY COMMISSION ONLY IF THEY WISH TO POSSESS AND USE LICENSED MATERIAL IN STATES SUBJECT TO U.S. NUCLEAR REGULATORY COMMISSION JURISDICTIONS.</p>													
<p>1 THIS IS AN APPLICATION FOR (Check appropriate item) <input type="checkbox"/> A NEW LICENSE <input type="checkbox"/> B AMENDMENT TO LICENSE NUMBER <input checked="" type="checkbox"/> C RENEWAL OF LICENSE NUMBER <u>06-30610-01</u></p>	<p>2. NAME AND MAILING ADDRESS OF APPLICANT (Include Zip code) Q/C Resource Technical Services 3 Simm Lane Newtown CT 06470</p>												
<p>3 ADDRESS(ES) WHERE LICENSED MATERIAL WILL BE USED OR POSSESSED 3 Simm Lane Newtown CT 06470</p>	<p>4. NAME OF PERSON TO BE CONTACTED ABOUT THIS APPLICATION Philip C Palilla TELEPHONE NUMBER 203-426-0200</p>												
<p>SUBMIT ITEMS 5 THROUGH 11 ON 8-1/2 X 11" PAPER. THE TYPE AND SCOPE OF INFORMATION TO BE PROVIDED IS DESCRIBED IN THE LICENSE APPLICATION GUIDE.</p>													
<p>5 RADIOACTIVE MATERIAL a. Element and mass number; b. chemical and/or physical form; and c. maximum amount which will be possessed at any one time.</p>	<p>6. PURPOSE(S) FOR WHICH LICENSED MATERIAL WILL BE USED</p>												
<p>7. INDIVIDUAL(S) RESPONSIBLE FOR RADIATION SAFETY PROGRAM AND THEIR TRAINING EXPERIENCE</p>	<p>8. TRAINING FOR INDIVIDUALS WORKING IN OR FREQUENTING RESTRICTED AREAS</p>												
<p>9. FACILITIES AND EQUIPMENT</p>	<p>10. RADIATION SAFETY PROGRAM</p>												
<p>11. WASTE MANAGEMENT</p>	<p>12. LICENSEE FEES (See 10 CFR 170 and Section 170.31) FEE CATEGORY AMOUNT ENCLOSED \$</p>												
<p>13 CERTIFICATION. (Must be completed by applicant) THE APPLICANT UNDERSTANDS THAT ALL STATEMENTS AND REPRESENTATIONS MADE IN THIS APPLICATION ARE BINDING UPON THE APPLICANT THE APPLICANT AND ANY OFFICIAL EXECUTING THIS CERTIFICATION ON BEHALF OF THE APPLICANT, NAMED IN ITEM 2, CERTIFY THAT THIS APPLICATION IS PREPARED IN CONFORMITY WITH TITLE 10, CODE OF FEDERAL REGULATIONS, PARTS 30, 32, 33, 34, 35, 36, 39 AND 40, AND THAT ALL INFORMATION CONTAINED HEREIN IS TRUE AND CORRECT TO THE BEST OF THEIR KNOWLEDGE AND BELIEF. WARNING: 18 U.S.C. SECTION 1001 ACT OF JUNE 25, 1948 82 STAT. 749 MAKES IT A CRIMINAL OFFENSE TO MAKE A WILLFULLY FALSE STATEMENT OR REPRESENTATION TO ANY DEPARTMENT OR AGENCY OF THE UNITED STATES AS TO ANY MATTER WITHIN ITS JURISDICTION</p>													
<p>CERTIFYING OFFICER - TYPED/PRINTED NAME AND TITLE Philip C Palilla</p>	<p>SIGNATURE Philip C Palilla DATE 4/18/11</p>												
<p>FOR NRC USE ONLY</p> <table border="1"> <thead> <tr> <th>TYPE OF FEE</th> <th>FEE LOG</th> <th>FEE CATEGORY</th> <th>AMOUNT RECEIVED \$</th> <th>CHECK NUMBER</th> <th>COMMENTS</th> </tr> </thead> <tbody> <tr> <td>APPROVED BY</td> <td></td> <td></td> <td></td> <td>DATE</td> <td></td> </tr> </tbody> </table>		TYPE OF FEE	FEE LOG	FEE CATEGORY	AMOUNT RECEIVED \$	CHECK NUMBER	COMMENTS	APPROVED BY				DATE	
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APPROVED BY				DATE									

REC'D IN LAT APR 22 2011

574341
NMSS/RGN1 MATERIALS-002

Item 5 + 6 Sources + Instruments used in

Sealed Sources				
Radioisotope	Manufacturer/ Model No.	Quantity	Yes	No
CS 137	USA-0356-S IntroTek 3500	Not to exceed the maximum activity per source/device as specified in the Sealed Source and Device Registration Sheet	<input checked="" type="checkbox"/>	<input type="checkbox"/>
CS 137	USA-0634-S-96 IntroTek 3500	Not to exceed the maximum activity per source/device as specified in the Sealed Source and Device Registration Sheet	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Am 241: Be	CZ-1009-S-96 IntroTek 3500	Not to exceed the maximum activity per source/device as specified in the Sealed Source and Device Registration Sheet	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Am 241: Be	USA-0632-S-96 IntroTek 3500	Not to exceed the maximum activity per source/device as specified in the Sealed Source and Device Registration Sheet	<input checked="" type="checkbox"/>	<input type="checkbox"/>
CS 137	USA/0634/S CPN MC series	Not to exceed the maximum activity per source/device as specified in the Sealed Source and Device Registration Sheet	<input checked="" type="checkbox"/>	<input type="checkbox"/>
CS 137	USA/0356/S CPN MC series	Not to exceed the maximum activity per source/device as specified in the Sealed Source and Device Registration Sheet	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Am 241: Be	USA/0627/S CPN MC series	Not to exceed the maximum activity per source/device as specified in the Sealed Source and Device Registration Sheet	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Am 241: Be	CZ-1009/S CPN MC series	Not to exceed the maximum activity per source/device as specified in the Sealed Source and Device Registration Sheet	<input checked="" type="checkbox"/>	<input type="checkbox"/>
CS 137	x.8 Humboldt 5001 series	Not to exceed the maximum activity per source/device as specified in the Sealed Source and Device Registration Sheet	<input checked="" type="checkbox"/>	<input type="checkbox"/>
CS 137	A305-1 Humboldt series 5001	Not to exceed the maximum activity per source/device as specified in the Sealed Source and Device Registration Sheet	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Am 241: Be	x.1 + x.1/2 Humboldt 5001 series	Not to exceed the maximum activity per source/device as specified in the Sealed Source and Device Registration Sheet	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Am 241: Be	AM2.No2 Humboldt 5001 series	Not to exceed the maximum activity per source/device as specified in the Sealed Source and Device Registration Sheet	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Sealed Sources

Radioisotope	Manufacturer/ Model No.	Quantity	Yes	No
<p>CS 137</p> <p>Am 241: Be</p>	<p>X.1214, X.8 Troxler Model 3400 series 4640</p>	<p>Not to exceed the maximum activity per source/device as specified in the Sealed Source and Device Registration Sheet</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	<p>X.1, X.1/2 Troxler Model 3400 series</p>	<p>Not to exceed the maximum activity per source/device as specified in the Sealed Source and Device Registration Sheet</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		<p>Not to exceed the maximum activity per source/device as specified in the Sealed Source and Device Registration Sheet</p>	<input type="checkbox"/>	<input type="checkbox"/>
<p><u>All</u> CS 137 sources used to measure density</p> <p><u>All</u> Am 241: Be used to measure moisture</p>		<p>Not to exceed the maximum activity per source/device as specified in the Sealed Source and Device Registration Sheet</p>	<input type="checkbox"/>	<input type="checkbox"/>
		<p>Not to exceed the maximum activity per source/device as specified in the Sealed Source and Device Registration Sheet</p>	<input type="checkbox"/>	<input type="checkbox"/>
		<p>Not to exceed the maximum activity per source/device as specified in the Sealed Source and Device Registration Sheet</p>	<input type="checkbox"/>	<input type="checkbox"/>
		<p>Not to exceed the maximum activity per source/device as specified in the Sealed Source and Device Registration Sheet</p>	<input type="checkbox"/>	<input type="checkbox"/>
		<p>Not to exceed the maximum activity per source/device as specified in the Sealed Source and Device Registration Sheet</p>	<input type="checkbox"/>	<input type="checkbox"/>
		<p>Not to exceed the maximum activity per source/device as specified in the Sealed Source and Device Registration Sheet</p>	<input type="checkbox"/>	<input type="checkbox"/>
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		<p>Not to exceed the maximum activity per source/device as specified in the Sealed Source and Device Registration Sheet</p>	<input type="checkbox"/>	<input type="checkbox"/>
		<p>Not to exceed the maximum activity per source/device as specified in the Sealed Source and Device Registration Sheet</p>	<input type="checkbox"/>	<input type="checkbox"/>

Item No.	Title and Criteria	Yes	No	N/A	Description Attached
5	<p>RADIOACTIVE MATERIAL</p> <p>Financial Assurance and Recordkeeping For Decommissioning</p> <ul style="list-style-type: none"> • Pursuant to 10 CFR 30.35(g), we shall maintain drawings and records important to decommissioning and transfer these records to a new licensee before licensed activities are transferred, or assign the records to the appropriate NRC Regional Office before the license is terminated. <p style="text-align: center;">OR</p> <ul style="list-style-type: none"> • If financial assurance is required, submit evidence. 	<input checked="" type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>

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Item No.	Title and Criteria	Yes	No	N/A	Description Attached
7	<p>INDIVIDUAL(S) RESPONSIBLE FOR RADIATION SAFETY PROGRAM AND THEIR TRAINING EXPERIENCE</p> <p>Radiation Safety Officer</p> <ul style="list-style-type: none"> • The name of the proposed RSO: <div style="margin-left: 40px;"><i>Philip C Palilla</i></div> AND EITHER • The specific training and experience of the RSO; <p style="text-align: center;">OR</p> <ul style="list-style-type: none"> • Alternative information demonstrating that the proposed RSO is qualified by training and experience, e.g., listed by name as an authorized user or the RSO on an NRC or Agreement State license that requires a radiation safety program of comparable size and scope. 				<p style="text-align: center;">■ <i>Below</i></p> <p style="text-align: center;">□</p>

The RSO has been working with said sources/devices since 1983 and has been an RSO since 1993. The individual has also been servicing sealed source devices since 2001 per USNRC

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Item No.	Title and Criteria	Yes	No	N/A	Description Attached
9	<p>FACILITIES AND EQUIPMENT</p> <p>Permanent Facilities Specifically Identified on the License</p> <ul style="list-style-type: none"> • Leak Test and Environmental Sample Analysis Providers: No response required for facilities. (Equipment is discussed in Item 10, Radiation Safety Program.) • Instrument Calibration: If only sealed sources are possessed in registered devices designed to emit a collimated beam for the purpose of instrument calibration, no response required. (Equipment is discussed in Item 10, Radiation Safety Program.) • Services that involve handling of sealed sources in a shielded container: No response required. (Equipment is discussed in Item 10, Radiation Safety Program.) • Services that involve handling of sealed sources outside a shielded container: <ul style="list-style-type: none"> – Submit a drawing or sketch of the proposed permanent facility identifying areas where radioactive materials, including radioactive wastes, will be used or stored. – Show in the drawings the relationship and distance between restricted areas and adjacent unrestricted areas. – Specify in the drawings shielding materials (concrete, lead, etc.) and means for securing radioactive materials from unauthorized removal. – Drawings, sketches, diagrams, etc. should indicate the scale or include dimensions on each drawing or sketch. – Describe engineered safety systems, e.g., area monitors, interlocks, alarms, etc. 				
		No Response is Necessary for this Section			
		No Response is Necessary for this Section			
		No Response is Necessary for this Section			
		<input type="checkbox"/>	<input checked="" type="checkbox"/>		<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>

Item No.	Title and Criteria	Yes	No	N/A	Description Attached
10	<p>RADIATION SAFETY PROGRAM</p> <p>The applicant is required to establish and submit its radiation protection program. Each item listed below should be addressed in the corresponding sections of this guide.</p> <ul style="list-style-type: none"> • Development and implementation of an ALARA program. • Description of equipment and facilities adequate to protect personnel, the public and the environment. • Confirmation that licensed activities are conducted only by individuals qualified by training and experience. • Development and maintenance of written operating and emergency procedures. • Implementation of an audit program to ensure that, at least annually, the radiation safety program is reviewed. • Description of organization structure and individuals responsible for ensuring day-to-day oversight of the radiation safety program. • Establishment and management of a radiation safety and decommissioning records system. • Methods or procedures for preventing the release of contaminated material and equipment. • Methods or procedures for preventing personnel contamination. Radiation safety procedures and the authorized users responsibilities unique to each type of service operation requested in the application. • Radiation safety procedures. • Equipment, techniques, and corresponding radiation safety procedures associated with providing services involving either sealed sources or unsealed materials. 				
	<ul style="list-style-type: none"> • <input checked="" type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> • <input checked="" type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> • <input checked="" type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> • <input checked="" type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> • <input checked="" type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> • <input checked="" type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> • <input type="checkbox"/> <input type="checkbox"/> <input checked="" type="checkbox"/> <input type="checkbox"/> • <input type="checkbox"/> <input type="checkbox"/> <input checked="" type="checkbox"/> <input type="checkbox"/> • <input type="checkbox"/> <input type="checkbox"/> <input checked="" type="checkbox"/> <input type="checkbox"/> • <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> • <input checked="" type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> 				
	<p>Audit Program</p>	<p>Need Not Be Submitted With Application</p>			

Item No.	Title and Criteria	Yes	No	N/A	Description Attached
10	<p data-bbox="293 394 881 426">RADIATION SAFETY PROGRAM (Cont'd.)</p> <p data-bbox="293 468 854 499">Radiation Monitoring Instruments (Cont'd.)</p> <p data-bbox="613 541 662 573" style="text-align: center;">OR</p> <ul data-bbox="293 625 967 919" style="list-style-type: none"> • A description of alternative equipment and/or procedures for ensuring that appropriate radiation monitoring equipment will be used during licensed activities and that proper calibration and calibration frequency of survey equipment will be performed. The statement, "We reserve the right to upgrade our survey instruments as necessary," should be added to the response. <p data-bbox="293 982 760 1014">Material Receipt and Accountability</p> <ul data-bbox="293 1066 967 1276" style="list-style-type: none"> • "Ordering licensed material and package receipt and opening will follow the model procedures in Appendix K of NUREG-1556, Vol. 18, 'Consolidated Guidance About Materials Licenses: Program-Specific Guidance About Service Provider Licenses,' dated November 2000." <p data-bbox="613 1329 662 1360" style="text-align: center;">OR</p> <ul data-bbox="293 1402 919 1476" style="list-style-type: none"> • Submit a description of procedure(s) for ordering licensed material and package receipt and opening. <p data-bbox="602 1518 673 1549" style="text-align: center;">AND</p> <ul data-bbox="293 1591 967 1665" style="list-style-type: none"> • For unsealed licensed material, submit a description of procedure(s) for ensuring material accountability. 	■			<input type="checkbox"/>
		■	<input type="checkbox"/>		<input type="checkbox"/>
					<input type="checkbox"/>
					<input type="checkbox"/>

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Item No.	Title and Criteria	Yes	No	N/A	Description Attached
10	<p>RADIATION SAFETY PROGRAM (Cont'd.)</p> <p>Occupational Dosimetry</p> <ul style="list-style-type: none"> • “We will have a prospective evaluation and determine that unmonitored individuals are not likely to receive, in one year, a radiation dose in excess of 10% of the allowable limits in 10 CFR Part 20, or we will monitor individuals in accordance with the criteria in the section entitled ‘Occupational Dose’ in NUREG-1556, Vol. 18, ‘Consolidated Guidance About Materials Licenses: Program-Specific Guidance About Service Provider Licenses,’ dated November 2000.” <p style="text-align: center;">OR</p> <ul style="list-style-type: none"> • A description of an alternate method for demonstrating compliance with the referenced regulations. <p style="text-align: center;">AND/OR</p> <ul style="list-style-type: none"> • Provide a bioassay program when using unsealed radioactive materials. If an applicant elects to provide a bioassay program that is less conservative than recommended in Regulatory Guide 8.20, its rationale should be stated. <p style="text-align: center;">AND</p> <ul style="list-style-type: none"> • Bioassay programs must include what the applicant considers an acceptable interval or schedule for conducting bioassays, identify action levels or guidelines, and describe specific actions to be taken when action levels are exceeded. Because of the complex nature of bioassay and corresponding data analysis, it is acceptable for applicants to make reference to the procedures in NRC guidance documents. 	<input checked="" type="checkbox"/>	<input type="checkbox"/>		<p style="text-align: center;"><input type="checkbox"/></p> <p style="text-align: center;"><input type="checkbox"/></p> <p style="text-align: center;"><input type="checkbox"/></p>

Item No.	Title and Criteria	Yes	No	N/A	Description Attached
10	<p>RADIATION SAFETY PROGRAM (Cont'd.)</p> <p>Occupational Dosimetry (Cont'd.)</p> <p style="text-align: center;">OR</p> <p> <ul style="list-style-type: none"> Contract with an outside group for bioassay services. Provide a commitment that each vendor is licensed or otherwise authorized by NRC or Agreement State to provide required bioassay services. </p> <p>Public Dose</p> <p>The applicant is not required to, and should not, submit a response to the public dose section during the licensing phase. This matter will be addressed during an inspection.</p> <p>Operating and Emergency Procedures</p> <ul style="list-style-type: none"> Procedure for obtaining an agreement with customers outlining the responsibilities of both the customer and service provider, when performing service operations at a customer's facility Instructions for handling and using licensed materials. Instructions for maintaining security during storage and transportation. Instructions to keep licensed material 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 work sites. Steps to take and whom to contact when an emergency occurs. Instructions for using remote handling tools when handling sealed sources, except low-activity calibration sources. Methods and occasions for conducting radiation surveys, including surveys for detecting contamination. 				<input type="checkbox"/>
		Need Not Be Submitted With Application			
		<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
		<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
		<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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		<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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Item No.	Title and Criteria	Yes	No	N/A	Description Attached
10	RADIATION SAFETY PROGRAM (Cont'd.)				
	Operating and Emergency Procedures (Cont'd.)				
	<ul style="list-style-type: none"> • Procedures to minimize personnel exposure during routine use and in the event of an incident, including exposures from inhalation and ingestion of licensed unsealed materials. 	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	<ul style="list-style-type: none"> • Methods and occasions for locking and securing stored licensed materials. 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	<ul style="list-style-type: none"> • Procedures for the implementation and adherence to good health physics practices while performing service operations: 				
	<ul style="list-style-type: none"> – Minimization of distance to areas, to the extent practicable, where licensed materials are used and stored 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	<ul style="list-style-type: none"> – Maximization of survey frequency, within reason, to enhance detection of contamination 	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	<ul style="list-style-type: none"> – Segregation of radioactive material in waste storage areas 	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	<ul style="list-style-type: none"> – Segregation of sealed sources and tracer materials to prevent cross-contamination 	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	<ul style="list-style-type: none"> – Separation of radioactive material from explosives 	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	<ul style="list-style-type: none"> – Separation of potentially contaminated areas from clean areas by barriers or other controls. 	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	<ul style="list-style-type: none"> • Personnel monitoring, including bioassays, and the use of personnel monitoring equipment. 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	<ul style="list-style-type: none"> • Transportation of licensed materials to temporary job sites, packaging of licensed materials for transport in vehicles, placarding of vehicles when needed, and physically securing licensed materials in transport vehicles during transportation to prevent accidental loss, tampering, or unauthorized removal. 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	<ul style="list-style-type: none"> • Procedures for picking up, receiving, and opening packages containing licensed materials, in accordance with 10 CFR 20.1906. 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	<ul style="list-style-type: none"> • Instructions for maintaining records in accordance with the regulations and the license conditions. 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Item No.	Title and Criteria	Yes	No	N/A	Description Attached
10	RADIATION SAFETY PROGRAM (Cont'd.)				
	Operating and Emergency Procedures (Cont'd.)				
	<ul style="list-style-type: none"> Procedures for identifying and reporting to NRC defects and noncompliance as required by 10 CFR 21.21(a) of this chapter. 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	<ul style="list-style-type: none"> Procedures and actions to be taken if a sealed source is ruptured, including actions to prevent the spread of contamination and minimize inhalation and ingestion of licensed materials and actions to obtain suitable radiation survey instruments. 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	<ul style="list-style-type: none"> Instructions for the proper storage and disposal of radioactive waste. 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	<ul style="list-style-type: none"> Procedures to be followed in the event of uncontrolled release of radioactive unsealed licensed material to the environment, including notification of the RSO, NRC, and other Federal and state agencies. 	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	<ul style="list-style-type: none"> Procedures for identifying and reporting to NRC defects and noncompliance. See Table 8.4, which describes the typical incident notifications required by NRC regulations. 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

APPENDIX C

Item No.	Title and Criteria	Yes	No	N/A	Description Attached
10	<p>RADIATION SAFETY PROGRAM (Cont'd.)</p> <p>Surveys</p> <ul style="list-style-type: none"> • “We will survey our facility and maintain contamination levels in accordance with the survey frequencies and contamination levels published in NUREG-1556, Vol. 18, ‘Consolidated Guidance About Materials Licenses: Program-Specific Guidance About Service Provider Licenses,’ dated November 2000.” <p style="text-align: center;">OR</p> <ul style="list-style-type: none"> • Submit description of alternative method for demonstrating how to evaluate a radiological hazard. <p>Leak Tests</p> <ul style="list-style-type: none"> • “Leak tests, when required by the license, 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 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.” <p style="text-align: center;">OR</p> <ul style="list-style-type: none"> • “Leak testing will follow the model procedures in Appendix O of NUREG-1556, Vol. 18, ‘Consolidated Guidance About Materials Licenses: Program-Specific Guidance About Service Provider Licenses,’ dated November 2000.” 	<p><input checked="" type="checkbox"/></p> <p><input type="checkbox"/></p> <p><input checked="" type="checkbox"/></p> <p><input type="checkbox"/></p>	<p><input type="checkbox"/></p> <p><input type="checkbox"/></p> <p><input type="checkbox"/></p> <p><input type="checkbox"/></p>	<p><input type="checkbox"/></p> <p><input type="checkbox"/></p> <p><input type="checkbox"/></p> <p><input type="checkbox"/></p>	<p><input type="checkbox"/></p>

APPENDIX C

Item No.	Title and Criteria	Yes	No	N/A	Description Attached
10	<p>RADIATION SAFETY PROGRAM (Cont'd.)</p> <p>Maintenance</p> <ul style="list-style-type: none"> • “We will implement and maintain procedures for conducting routine maintenance of our device according to each manufacturer’s (or distributor’s) written recommendations and instructions.” <p style="text-align: center;">OR</p> <ul style="list-style-type: none"> • Alternative procedures are provided for NRC’s review. • “We will have the device manufacturer (or distributor) or other person authorized by NRC or an Agreement State to perform non-routine maintenance on our devices.” <p style="text-align: center;">OR</p> <ul style="list-style-type: none"> • Information requested in Appendix P of NUREG-1556, Vol. 18, “Consolidated Guidance About Materials Licenses: Program-Specific Guidance About Service Provider Licenses.” dated November 2000, is provided to support requests to conduct non-routine maintenance procedures. 	<p style="text-align: center;"><input checked="" type="checkbox"/></p> <p style="text-align: center;"><input type="checkbox"/></p> <p style="text-align: center;"><input type="checkbox"/></p>	<p style="text-align: center;"><input type="checkbox"/></p> <p style="text-align: center;"><input type="checkbox"/></p>		<p style="text-align: center;"><input type="checkbox"/></p> <p style="text-align: center;"><input type="checkbox"/></p> <p style="text-align: center;"><input type="checkbox"/></p>
	<p>Minimization of Contamination</p> <ul style="list-style-type: none"> • NRC will consider that the criteria for minimization of contamination has been met if the applicant’s responses satisfy the criteria in the following sections: “Radioactive Material – Unsealed and/or Sealed Sources,” “Facilities and Equipment,” “Radiation Safety Program – Safe Use of Radioisotopes and Emergency Procedures,” “Radiation Safety Program – Surveys,” and “Radiation Safety Program – Waste Management.” 	<p>No Response is Necessary for this Section</p>			

Training:

Q/C Resource Technical Services has been providing acceptable training for ASO and operators of portable moisture/density gauges. Philip C Palilla is the only person authorized to conduct such training for users of Troxler Electronics, Humboldt Scientific, InstronTek, and CPN gauges. Said course meets all criteria as listed in Appendix H of NUREG-1556, Vol 18. Classes/certifications have been provided by Philip C Palilla since 1983. The class also meets 10CFR 30.34(i) regarding security + transportation.

Quantity of Radioactive Material:

Q/C Resource Technical Services will NOT exceed a possession limit of 1300 millicuries of AM-241.

Philip C Palilla
4/18/11

Non-Routine Maintenance Checklist:

Q/c Resource Technical Services has been providing service/calibration of sealed source portable devices since 2001. We have been meeting all the criteria as set for in Appendix P of NUREG-1556 VOL 18.

Phil C. Pallela
4/18/11