



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION I
475 ALLENDALE ROAD
KING OF PRUSSIA, PENNSYLVANIA 19406-1415

May 25, 2011

Docket No. 03035611
Control No. 574341

License No. 06-30610-01

Philip Palilla
Radiation Safety Officer
Q/C Resource Technical Services
3 Simm Lane
Newtown, CT 06470

SUBJECT: Q/C RESOURCE TECHNICAL SERVICES, REQUEST FOR ADDITIONAL INFORMATION CONCERNING APPLICATION FOR RENEWAL TO LICENSE, CONTROL NO. 574341

Dear Mr. Palilla:

This is in reference to your applications dated January 28, 2011 and April 18, 2011 (ADAMS Accession Nos. ML110320258 and ML111150015), and letter dated May 11, 2011 (ML111360150), regarding your request to renew Nuclear Regulatory Commission License No. 06-30610-01. In order to continue our review, we need the following additional information:

1. You stated in your original application dated January 28, 2011, that in addition to possession of radioactive sealed sources in portable gauges you would like to be authorized for the possession of Cesium-137 (Cs-137) and Americium-241 (Am-241) in small amounts for the taking and analyzing of leak test samples for clients. However in your application dated April 18, 2011, you did not make this same request. Please confirm if you want the authorization to collect leak test samples and to analyze these samples as a service to others. If so, please submit the isotope, chemical and/or physical form, maximum possession amount, and applicable procedures for these types of activities.
2. Your application dated April 18, 2011, did not request a maximum possession limit for Cs-137. Please provide the maximum possession limit for Cs-137 taking into account the maximum number of devices with sealed sources you will possess at your facility at any one time.
3. Item 9 of your current license indicates that you are authorized to distribute gauges to persons authorized to receive the licensed material contained in these devices pursuant to terms and conditions of specific licenses issued by the NRC or any Agreement State. The word "distribution" is typically terminology reserved for manufacturers and distributors. Since you are a service provider, this may not be the most appropriate terminology for your license. Re-distribution is the process of distributing an item again. Please indicate if your service will include re-distribution of gauges that once belonged to your clients and that you are selling to other clients. In addition, include your procedure to assure that the radioactive material is only re-distributed to persons authorized to

receive the licensed material contained in these devices pursuant to terms and conditions of specific licenses issued by the NRC or any Agreement State.

4. In your application dated April 18, 2011, you stated that you would provide instruction and customer training. Please submit the following information:
 - a. An outline of the radiation safety and hazmat training given to prospective customers. Please make sure that your training contains up-to-date information regarding NRC events related to portable gauge licensees (i.e., trucks with gauges stolen, gauges run over at construction sites, gauges that had fallen off a back of a pickup truck, etc.).
 - b. A copy of a typical examination, the correct answers to the examination questions, and the passing grade.
 - c. A description of the field (practical) examination that will be given to customers.

You may find Appendix D of NUREG-1556, Volume 1, "Consolidated Guidance About Materials Licenses, Program-Specific Guidance About Portable Gauge Licenses (Revision 1)" and additional guidance is contained in the errata: Appendix H, "Operating, Emergency, and Security Procedures" helpful in preparing your response.

5. In your application dated April 18, 2011, you stated that you will perform weld inspections of the source rods for Troxler Model 3400 Series gauges, but you made no reference to checking the welds of other manufacturer's devices that are listed on your license. Please confirm if you wish to be authorized to perform weld checks for other manufacturer's devices. If so, please submit your training and experience, as well as, the procedure used for each type of gauge.
6. In your application dated April 18, 2011, you stated that you would perform repairs. We will need additional information as to the kind of repairs you will perform. For example, calibration, electronics, welding repairs (i.e., different from welding inspection), etc. If so, please submit your training and experience, as well as, the procedure used for each type of repair.
7. In your applications dated January 28, 2011 and April 18, 2011, you stated that you would perform non-routine maintenance by detaching and/or removing the source rods from the gauges. Please submit the procedures you will utilize to accomplish this task. Please include the required information found in Section 8.9 of NUREG-1556, Vol. 18, "Consolidated Guidance About Materials Licenses, Program-Specific Guidance About Service Provider Licenses" and submit your procedure according to Appendix P of NUREG-1556, Vol. 18. Your procedure should address, but is not limited to:
 - doses to personnel and members of the public;
 - ALARA program;
 - security of radioactive material;
 - appropriate signs and labels;
 - confirmation to follow manufacturer's and/or distributor's instructions;
 - confirm that any non-manufacturer/non-distributor supplied replacement components or parts, or the use of materials (e.g., lubricants) other than

those specified or recommended by the manufacturer or distributor are evaluated to ensure that they do not degrade the engineering safety analysis performed and accepted as part of the device registration; and

- an operability test to assure that sources/devices function as designed before being returned to use.

These procedures must also contain language to:

- confirm that individuals performing non-routine operations will wear both whole body and extremity dosimeters or you will perform a perspective evaluation demonstrating that unmonitored individuals are not likely to receive, in one year, 10% of the allowable limits;
 - verify the possession of at least one survey instrument meeting the requirements in "Radiation Safety Program – Instruments in NUREG-1556, Vol. 18, 'Consolidated Guidance About Materials Licenses, Program-Specific Guidance About Service Provider Licenses', dated November 2000";
 - describe the steps taken to ensure radiation levels in areas where non-routine operations take place do not exceed 10 CFR 20.1301 limits;
 - specify where and when surveys will be conducted during non-routine operations; and
 - commit to maintaining, for 3 years from the date of the survey, records of the survey (e.g., who performed the survey, date of the survey, instrument used, measured radiation levels correlated to location of those measurements), as required by 10 CFR 20.2103.
8. In your application dated April 18, 2011, you committed to establish a radiation protection program. Section 8.10 of NUREG-1556, Vol. 18 requires that you submit your radiation protection program. This includes, but is not limited to, information such as:
- development of an audit program such as described in Appendix I of NUREG-1556, Vol. 18, "Consolidated Guidance About Materials Licenses, Program-Specific Guidance About Service Provider Licenses";
 - development and implementation of ALARA program;
 - a description of facility and equipment to protect personnel, public and environment;
 - a confirmation that only qualified individuals will conduct licensed activity;
 - implementation of an annual audit program to review the radiation safety program;
 - a description of the organizational structure and the individuals responsible for the day-to-day oversight of the radiation safety program;
 - the establishment and management of a radiation safety and decommissioning records system; and
 - a description of the instrumentation you will utilize as described in Section 8.10.2 of NUREG-1556, Vol. 18, "Consolidated Guidance About Materials Licenses, Program-Specific Guidance About Service Provider Licenses."

9. In your application dated April 18, 2011, you stated you will have and maintain operating and emergency (O & E) procedures. Please submit your O & E procedures and include the information found in Section 8.10.6 of NUREG-1556, Vol. 18, "Consolidated Guidance About Materials Licenses, Program-Specific Guidance About Service Provider Licenses", in your response. Since Volume 18 was issued, there have been some changes to NRC and DOT regulations that should be incorporated into your O & E procedures. Please submit your procedures for complying with all applicable US DOT and 10 CFR Part 30.34(i) requirements for security of portable gauges, both in transit and storage (i.e. transportation security seals and two independent barriers).

Current NRC regulations and guidance are included on the NRC's website at www.nrc.gov; select **Nuclear Materials; Med, Ind, & Academic Uses**; then **Licensee Toolkits**, see our **toolkit index page**. You may also obtain these documents by contacting the Government Printing Office (GPO) toll-free at 1-866-512-1800. The GPO is open from 7:00 a.m. to 6:30 p.m. EST, Monday through Friday (except Federal holidays).

We will continue our review upon receipt of this information. Please reply to my attention at the Region I Office and refer to Mail Control No. 574341. If you have any technical questions regarding this deficiency letter, please call Shawn Seeley at (610) 337-5102.

If we do not receive a reply from you within 30 calendar days from the date of this letter, we will assume that you do not wish to pursue your application.

Sincerely,

Original signed by Kathy Modes

Kathy Modes
Senior Health Physicist
Decommissioning Branch
Division of Nuclear Materials Safety

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SUNSI Review Complete: SSeeley

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