



GARG CONSULTING SERVICES, INC.

ENGINEERS • CONSULTANTS • CONSTRUCTION MANAGERS

Michael Reichard
Health Physicist
Materials Security and Industrial Branch
Division of Nuclear Materials Safety
Nuclear Regulatory Commission, Region I
2100 Renaissance Boulevard, Suite 100
King of Prussia, PA 19406-2713

Q-0

MS-16

06-28785-01

03032913

REC'D 1 NOV 27 12 PM 07 11

SUBJECT: Re: GARG CONSULTING SERVICES, INC. REQUEST FOR ADDITIONAL INFORMATION CONCERNING APPLICATION FOR RENEWAL OF LICENSE, CONTROL NO. 579243

Dear Mr. Reichard,

On September 4th, 2012 we submitted our application for renewal of our current Materials License (No. 06-28785-01) and on November 8th, 2012 we received a letter from your office requesting for additional information to be provided in order to process our renewal application.

Totally seven extra pieces of information were requested in the letter (please refer to attached copy of the original NRC letter, Mail Control No. 579243) and here are our replies to each of the requests.

1) Garg Consulting Services, Inc. (GCS) does possess a calibrated TROXALERT™ radiation monitor (Model 3105B) and kept on monitoring the radiation amount around our nuclear gauges storage room located at 1960 Silas Deane Highway, Rocky Hill, CT at least once a year (when we perform annual internal audit) since year of 2009. Currently the radiation around our storage room is constantly limited at a minimum amount (please refer to the attachment #1, 2012 radiation survey report).

In each annual refresh training that GCS provided to its gauge operators, we used to use the aforementioned radiation safety survey instrument to show the radiation intensity around portable nuclear gauges while it's being actively used.

2) With one of gauge operator's present, GCS RSO always conduct physical inventory on all nuclear devices and all seal sources every 6 months or so since year of 2009. GCS also had an established Check-in/Check-out record system to keep an accurate log on locations of each nuclear devices when they were deployed to the field.

3) In order to closely monitor the personnel who has access to the nuclear gauges, GCS equipped each gauge operator a dosimetry which is provided and serviced by Troxler Electronic Labs, Inc. (Troxler). The dosimetry badges are replaced for each quarter of the year and returned badges are analyzed by Troxler in order to identify any over dosage to any specific gauge operator. Please refer to attachment #2, most recent Troxler radiation exposure report, as an example.

4) GCS has established a Radiation Safety Program that meets the NRC criteria (refer to attachment #3, GCS Radiation Safety Program) since 2009. The Program is implemented and revised regularly

after each annual internal audit. The Program is distributed to each GCS gauge operator each year and is available for GCS employee to download on our website.

- 5) By using leak testing kits provided by Troxler or CPN (depending on gauge model), GCS tried to establish and maintain a 6-month interval leak testing record for each nuclear gauge that GCS possessed. Collected samples were sent back to Troxler/CPN for analysis and leak test reports filed and documented permanently. Please refer to attachment #4, most recent leak test report for one of GCS nuclear gauges, as an example.
- 6) All three nuclear gauges currently under GCS possession were regularly shipped back to manufacturer (Troxler/CPN) for calibration and maintenance service annually. All service and calibration reports were documented permanently. Please refer to attachment #5, most recent Troxler calibration and safety inspection reports for one of GCS nuclear gauges, as an example.
- 7) One of the Troxler gauge (SN:62741) that GCS owns had technical issues with battery charging system while it was still almost brand new in 2010. According to GCS policy, it was shipped back to manufacturer (Troxler) for repair service for totally three times till eventually fixed. GCS paid all the shipping charges and some of the parts and labor although this problem was actually a manufacturing defect (refer to attachment #6, shipping records, for details). GCS will keep on implement same policy and will ONLY ship the gauges back to its manufacturer for any type of non-routine repairing services, including the one requires removal of the source rod.

As stated above, since 2009 Garg Consulting Services, Inc. had established, implemented and maintained a practical Radiation Safety Program that meets all the NRC requirements and recommendations. We will keep on maintaining the same standards and routines in our future operations related to nuclear gauges.

Should you have any further question, please feel free to contact me at (860)563-0582.

Thanks.

Sincerely,



11/23/2012

Zhen Zhou
RSO
Garg Consulting Services, Inc.
2096A Silas Deane Highway
Rocky Hill, CT 06067

Attachment # 1

Garg Consulting Services
2096A Silas Deane Highway
Rocky Hill, CT 06067

On February 27, 2012, I, Deborah Bailey, performed a radiation level survey of the material storage room at 1960 Silas Deane Highway, Rocky Hill, CT where the nuclear density machines are permanently stored. It is noted that all three machines were currently stored at this site. Keyed locks were in place for all machines. It is noted that all required paperwork was stored with the machines.

The radiation intensity was measured along 3 different directions utilizing a fully functioning radiation monitor, Troxalert 3105B, last calibrated on 06/04/05.

A Measurement was taken in the material storage room approximately 1' from each of the storage units and resulted in like readings of 0.5 mrem/h.

Outside the material storage room the following measurements were observed.

North of Storage Room

Distance to source (ft)	Radiation Level (mrem/hr)
5'	0.06
10'	0.06
15'	0.00

South of Storage Room

Distance to source (ft)	Radiation Level (mrem/hr)
5'	0.06
10'	0.06
15'	0.00

West of Storage Room

Distance to source (ft)	Radiation Level (mrem/hr)
5'	0.06
10'	0.00
15'	0.00

Signed by:

Deborah Bailey

Date

2/27/12

Attachment # 2

CUSTOMER ID: 120

REPORT DATE: 08/17/12

FACILITY: GARG CONSULTING SERVICES, INC.
ATTENTION: ZHEN ZHOU
2096 A SILAS DEANE HWY
ROCKY HILL, CT 06067



TROXLER RADIATION MONITORING SERVICES
A Division of Troxler Electronic Laboratories, Inc.
3008 Cornwallis Road • Box 12057 • RTP, NC 27709
Tel: 877-876-9537 • Fax: 866-391-2759

Accredited by the National Institute of Standards and Technology through NVLAP under lab code: 100555-0

RADIATION EXPOSURE REPORT

NAME	DOSIMETER ID	WEARER ID	BODY REGION	BADGE TYPE	WEAR TERM	EXPOSURE TO BADGE (MILLIREM)			CUMULATIVE TOTALS (MILLIREM)						NOTES
						SHALLOW	DEEP	EYE	CALENDAR YEAR			LIFETIME			
									SHALLOW	DEEP	EYE	SHALLOW	DEEP	EYE	
Period Beginning: 04/01/12															
[REDACTED]	03260624	[REDACTED]	W	03	Q	<MDL	<MDL	<MDL	<MDL	<MDL	<MDL	<MDL	<MDL	<MDL	
[REDACTED]	03260629	[REDACTED]	W	03	Q	<MDL	<MDL	<MDL	<MDL	<MDL	<MDL	<MDL	<MDL	<MDL	
[REDACTED]	03260620	[REDACTED]	W	03	Q	<MDL	<MDL	<MDL	<MDL	<MDL	<MDL	12	12	12	
[REDACTED]	03260628	[REDACTED]	W	03	Q	<MDL	<MDL	<MDL	<MDL	<MDL	<MDL	<MDL	<MDL	<MDL	
[REDACTED]	03260621	[REDACTED]	W	03	Q	<MDL	<MDL	<MDL	<MDL	<MDL	<MDL	<MDL	<MDL	<MDL	
[REDACTED]	03260626	[REDACTED]	W	03	Q	<MDL	<MDL	<MDL	<MDL	<MDL	<MDL	<MDL	<MDL	<MDL	
[REDACTED]	03260622	[REDACTED]	W	03	Q	<MDL	<MDL	<MDL	<MDL	<MDL	<MDL	<MDL	<MDL	<MDL	
[REDACTED]	03260623	[REDACTED]	W	03	Q	<MDL	<MDL	<MDL	<MDL	<MDL	<MDL	<MDL	<MDL	<MDL	
[REDACTED]	03260625	[REDACTED]	W	03	Q	<MDL	<MDL	<MDL	<MDL	<MDL	<MDL	<MDL	<MDL	<MDL	
[REDACTED]	03260627	[REDACTED]	W	03	Q	<MDL	<MDL	<MDL	<MDL	<MDL	<MDL	75	74	75	

PERSONAL INFORMATION WAS REMOVED BY NRC. NO COPY OF THIS INFORMATION WAS RETAINED BY THE NRC.

TERMS AND EXPLANATIONS

Body Region
A = Area
C = Control
E = Extremity
W = Wholebody

Badge Type
03 = TLD802
16 = TLD760
18 = UltraRing

Dose Definitions
<MDL = Dose less than minimum detectable level
Shallow = Dose equivalent at 7 mg/cm² tissue depth
Eye = Dose equivalent at 300 mg/cm² tissue depth
Deep = Dose equivalent at 1000 mg/cm² tissue depth

Wear Term
M = Monthly
Q = Quarterly

Notes
A1 = Control badge not returned
A2 = Control badge returned for different period
A3 = Control badge received damaged
A5 = Control badge exhibited exposure
A6 = Control badge exhibited unusual response

D6 = Unusual element response; results suspect
L1 = Dose estimated by customer
L2 = Dose estimated by Troxler at customer request

Attachment # 3



GARG CONSULTING SERVICES
RADIATION SAFETY PLAN (RSP)

Ver. 1.2_2012

10 CFR 20.1101(a): Each licensee shall develop, document, and implement a radiation protection program commensurate with the scope and extent of licensed activities.

This Radiation Safety Plan will be implemented at all times. A copy of these procedures shall be kept in Garg radioactive materials file folder in the office, and another copy should be maintained in the shipping/storage case(s) of the Garg possessed nuclear gauge(s) at all times.

A handwritten signature in black ink, appearing to read 'Zhen Zhou', is written over a horizontal line.

SIGNED _____ DATE January 2, 2012

Zhen Zhou, R.S.O.

General Statement

This Radiation Safety Plan (RSP) covers the procedures for the safe and proper use and possession of radioactive material as contained in portable moisture/density gauges used to measure soil and other materials. When handled in accordance with this plan, the radioactive materials present no hazard to Garg Consulting Services employees, customers, or the general public.

Operation Procedures

1. The operator will exercise suitable control over the gauge at all times. At no time is it to be left unattended or in the possession of an unauthorized person;
2. The operator will stand no more than 10 feet from the gauge while a test is in progress. The operator will ensure that no equipment or vehicles are within 20 feet of where a gauge is being used to take a test, unless they are shut down;
3. When testing is complete, the gauge will be locked and returned to its storage/transportation case and returned to the permanent storage location as soon as possible;
4. When using a gauge, the operator will wear the personal dosimetry device assigned. When the operator is not using gauges, the dosimeter device will be kept in a radiation free, low heat area;
5. At all times operators will observe ALARA (As Low As Reasonably Achievable) principles to minimize any dose received.
6. While the equipment is in the operator's possession, the operator will have a copy of the:

Radioactive Material License	Gauge Operation Manual
Radiation Safety Plan	Current Leak Test Certificate
Letter of Authorization from the RSO	Shipping Paper

Transportation Guidelines

1. During transportation, the shipping container shall be fully secured in the transport vehicle, locked, and located away from personnel. When transported in a closed vehicle (car or van), the vehicle should be locked when unattended. When transported in an open bed vehicle, such as pickup truck, the case should be locked and securely fastened and locked to the truck bed using a chain or cable passing through the handles of the case;
2. The equipment shall be transported in an approved DOT shipping container with all the required labels and markings;

3. During transportation, the operator will have a proper shipping paper within arm's length in the driver's compartment and visible from outside the vehicle;
4. When an open bed vehicle is parked overnight outside of a building, the operator/transporter should lock the case in a closed cab, such as the driver's compartment, and chain or cable the case to a fixed structure, such as steering wheel, and then cover the case;
5. When shipping by common carrier, the package shall be in compliance with the U.S. D.O.T. Regulations, 49 CFR 170-179.

Storage

1. Gauges shall always securely stored in the cabinet / closet at job site, or in the radioactive material storage room at 1960 Silas Deane Highway, Rocky Hill, CT;
2. Gauges shall be secured against unauthorized removal by at least two locks and key mechanism;
3. The gauge storage location shall be posted with a "Caution, Radioactive Material" sign;
4. An In/Out Utilization Log shall be kept at the storage location and used by gauge operators;
5. Gauges shall only be stored at temporary sites that meet the security, posting, and safe dose to the general public requirements of the permanent storage location.

Maintenance

1. Periodic maintenance will include cleaning the gauge, and the gauge clean-out plate and shutter mechanism. The operator will have received proper instruction on how to clean the gauge and will wear his assigned dosimeter device;
2. No maintenance will be performed in which the radioactive source is removed from the gauge. The gauge will be returned to the manufacturer or an approved service center
3. A leak test shall be performed annually using an approved leak test kit provided by the gauge manufacturer or other licensed leak test providers. The operator will have received proper instruction on how to leak test the gauge and will wear his assigned monitoring device when performing the test;
4. The shipping case shall be periodically checked for cracks, to make sure the latches are functional, and to verify that all labels are present and readable. A damaged case should be factory repaired or replaced.

Training

1. All operators will complete a manufacturer's or licensed training provider's Operator's Training Course. A written record of completion will be retained on file;
2. All operators will receive refresher (recurrent) training at intervals not to exceed one year. Refresher training may be provided by either the gauge manufacturer or the Radiation Safety Officer (RSO). A written record of completion will be retained on file;

EMERGENCY PROCEDURES

Emergency Call List

RSO 24 Hour cell _____ 1-860-328-0851 _____

STATE DEP RADIATION HAZARD _____ 860-424-3029 / 860-424-4065 _____

LICENSING AGENCY _____ N.R.C. (Lic# 06-28785-01) / CT D.E.P. (App# 201107107) _____

MANUFACTURER (CPN) EMERGENCY SERVICES _____ 1-800-852-7550 _____

Physical Damage

1. If any moving equipment is involved, stop its movement first, until the extent of contamination, if any, can be estimated;
2. Cordon off an area with a 15 feet radius around the incident;
3. Visually inspect the gauge to determine the extent of the damage to the source(s) housing(s), and shielding. If the source(s), source housing(s) and shielding are intact and functional, the gauge can be removed from the site, returned to the shipping container, and shipped back to manufacturer for repair or replacement;
4. If the integrity or location of the source(s) cannot be positively identified, at the earliest possible time, when the situation is under control, contact the RSO, describe the conditions and follow the instructions. The RSO will immediately notify the appropriate regulatory agency;
5. The RSO shall follow the instructions of the regulatory agency;
6. If the source rod is extended and bent, or the shielding is damaged such that dose rates are likely to exceed those of an undamaged gauge, call the manufacturer for instructions before shipment.

Lodged or Lost Bore-Hole Probe

1. Operating procedure to prevent a probe from becoming stuck or lost in a bore-hole:
 - a. All access holes for probe(s) shall be lined with a continuous casing from the lowest depth to a minimum of six inches above the surface;
 - b. The cable connectors to both the probe and surface electronics shall be checked daily to assure they are tight;
 - c. For all access hole sites greater than 12 feet in depth, a dummy probe, whose stiffness, outside diameter and effective length are equal to that of the active probe, will be lowered to the bottom of the hole before deploying the radioactive source(s).
2. Emergency procedures if a probe becomes stuck in a bore-hole and it becomes apparent that efforts to recover the sealed source will not be successful:
 - a. Immediately secure the area around the hole;
 - b. Notify the NRC authority immediately by telephone of the circumstances that resulted in the inability to retrieve the source;
 - c. Follow instructions of the NRC authority;

Theft or Loss

1. Immediately notify the RSO. The RSO will immediately notify the appropriate regulatory agency and the police.

Fire Hazardous

1. Call the Fire Department;
2. Take action appropriate with a fire to protect personnel;
3. Notify RSO;
4. Stand by to advise the fire fighters as to the nature, location, and potential hazardous of the radioactive materials. Supply them with an information packet consisting of the facility layout and a data sheet of the equipment, including a photograph. Be sure to include any other important information.

Melting Points of gauge building materials:

Stainless Steel	2550	1400
Carbide	2000	1090
Aluminum	1005	540
Lead	620	327
Polyethylene	257	125

Temperature in an industrial fire normally ranges from 500 at floor level to a high at the ceiling of 1400 to 1800. The polyethylene and lead will melt in most fires, the aluminum only in a severe fire. The stainless steel capsule will not reach its melting point in normal fire hazards.

Disposal / Decommissioning

1. Disposal of gauges shall only be by transfer to a properly licensed organization. A Disposition of Materials form must be completed and submitted to the licensing agency before a license will be terminated;
2. The regulatory agency will be notified 30 or more days in advance of any relocation of the permanent storage location. Formal decommissioning will not be required, provided leak tests are current.

END OF RADIATION SAFETY PLAN

Attachment # 4



Troxler Electronic Laboratories, Inc.

3008 Cornwallis Rd., P.O. Box 12057
Research Triangle Park, NC 27709
Tel: (877) 876-9537 Fax: (866) 391-2759
License: NC 032-0182-1

ZHEN ZHOU
Garg Consulting Services, Inc.
2096 A Silas Deane Highway
Rocky Hill, CT 06067-1361

Cust ID: 11557

LEAK TEST CERTIFICATE

DEVICE:

Model: 3430 **Serial No:** 61577

SEALED SOURCES:

Serial No.	Measure Date	Nuclide	GBq	mCi
47-4658	10/20/1980	Am-241:Be	1.48	40
77-8422	08/05/2008	Cs-137	0.296	8

LEAK TEST ANALYSIS:

Sample collected on: 10/08/2012
Sample analyzed on: 10/15/2012 12:24:46 P **Position:** 54
Analyzed by: ttaylor

	ALPHA	BETA-GAMMA
Conversion factor (cpm/Bq)	1.27E+01	1.99E+01
Background measurement (cpm)	1	27
Sample measurement (cpm)	0	26
Activity (Bq)	< MDA	< MDA
Min. Detectable Activity (Bq)	6.3E-01	1.4E+00

This certifies that the leak test results are:

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

Attachment # 5

Gauge model - 03430

Gauge serial number - 062741

Reference standard counts: Density = 02372 Moisture = 0657

Calibration Date: XXXXXXXXXX Print Date: 10/21/2011 Bay = 046

*** Density calibration count data ***

Depth (in)	Magnes 1776	Mag/Al 2207	Alumin 2718
BS	01054	00712	00462
02	03885	02558	01545
03	04085	02626	01524
04	04009	02498	01394
05	03665	02212	01185
06	03242	01880	00958
07	02726	01521	00748
08	02268	01203	00562
09	01776	00911	00417
10	01399	00686	00299
11	01071	00501	00217
12	00824	00374	00150

POWER LEAKAGE
FINALLY FIXED.

*** Density performance parameters ***

Pos	A	B*1000	C	'Y'	Slope	Prec
BS	2.931	1.13701	-0.04579	2207	0.8	8.84
02	10.255	1.03546	0.02893	2207	3.2	4.32
03	11.555	1.06033	0.07563	2207	3.5	4.00
04	12.963	1.13814	0.06937	2207	3.6	3.81
05	13.565	1.21590	0.06124	2207	3.4	3.77
06	14.282	1.31728	0.04884	2207	3.2	3.76
07	14.724	1.44376	0.01973	2207	2.8	3.88
08	15.755	1.59390	0.00501	2207	2.4	3.99
09	15.082	1.71775	-0.00839	2207	2.0	4.33
10	14.650	1.83793	-0.00736	2207	1.6	4.64
11	15.589	2.04059	-0.01722	2207	1.3	5.07
12	12.347	2.04282	-0.00476	2207	1.0	5.59

*** Moisture calibration count data ***

Mag	Mag/Poly	S R
0	597	
0018	0424	0409

*** Moisture performance parameters ***

E	F*1000	Rat	Prec	S R	Exerr
0.02740	1.03511	3.25	5.04	-22.1	15.8

sent in for repair
3-block calib. done on
10/21/2011



Troxler Electronic Laboratories, Inc.
3008 Cornwallis Rd. • PO Box 12057 • Research Triangle Park, NC 27709
Phone: +1.919.549.8661 • Fax: +1.919.549.0761 • www.troxlerlabs.com

Gauge Safety Inspection Report

Model: 3430

SN: 62741

RO#: 19452

Inspected at: NC

1 - Auto (Orbital) weld
 2 - Manual Weld

Inspection Date: 8/31/2011

Handle Condition
 1 - Normal
 2 - Abused (comments)

Overall Gauge Condition
 1 - Good
 2 - Normal
 3 - Poor (comments)
 4 - Abused (comments)

AmBe Plug - As Found
 Tight
 Loose
 Not applicable

Sliding Block - As Found
 0 - Fully Closed
 1 - <= 25% Open
 2 - 26-50% Open
 3 - 51-75% Open
 4 - 75-100% Open
 5 - Fully Open

Reason Not Fully Closed
 1 - Excessive Dirt
 2 - Weak Spring
 3 - Both
 4 - Other (Comments)

AmBe Plug - Fixed
 Yes (Loctite applied)
 No (already done)
 Not required
Only required for gauges with tall plugs & serial numbers less than 39000.

Sliding Block Cracks
 Uncracked
 Cracked
 Not applicable
(Only models 3450 or 3451)

Source Rod Wear
 0 - None
 1 - Slight
 2 - Some
 3 - Medium
 4 - Significant.
 5 - Extreme (comments)

Cause of Rod Wear
 0 - None
 1 - Sliding Block
 2 - Bearing/Wiper
 3 - Both
 4 - Other (comments)

I. Concavity
 0 - None
 1 - Slight
 2 - Some
 3 - Medium
 4 - Significant
 5 - Extreme (comments)

II. Porosity/Pitting
 0 - None
 1 - Slight
 2 - Some
 3 - Medium
 4 - Significant.
 5 - Extreme (comments)

III. Cracks
 0 - None
 1 - 1 to 20%
 2 - 21 - 40%
 3 - 41 to 60%
 4 - 61 to 80%
 5 - 81 to 100%

COMMENTS:

Attachment # 6

PAULA

RL CARRIERS

PLEASE CLACK

36794937-6

GATOR

GREENWOOD

PARAMOUNT

(800) 543-5589

www.gorlc.com

P.O. BOX 271 WILMINGTON, OHIO 45177-0271

SHIPPER'S COPY
 This shipment is subject solely to the terms and conditions of Carrier's Individual and Collective Tariffs, including Limitations of Liability and the Uniform Straight Bill of Lading, NMFC 100 series.

DATE	6/17/2011	CONSIGNEE PHONE	877-876-9537	SHIPPER'S PHONE	8605630582
TO: CONSIGNEE	Troxler North Carolina Service Center			FROM: SHIPPER	Gary Consulting Services, Inc.
ADDRESS	3008 E. Cornwallis Rd.			ADDRESS	2096 A Silas Deane Hwy.
CITY	Reaseach Triangle Park	STATE	NC	ZIP CODE	27709
CITY	Rocky Hill	STATE	CT	ZIP CODE	06067

BILL TO:
 THIRD PARTY
 ADDRESS
 CITY STATE ZIP CODE

COD TOTAL AMOUNT \$
 Check Appropriate Box: Certified Check Company Check
 COD fee to be paid by: Shipper Consignee On a Collect On Delivery shipment, the letters "COD" must appear before consignee's name or as otherwise provided in Item 430, Sec. 1.

SHIPPER'S NO. _____
 PURCHASE ORDER NO. _____
 QUOTE NO. _____

REMIT COD TO:
 ADDRESS
 CITY STATE ZIP CODE

FREIGHT CHARGES ARE PREPAID unless marked collect CHECK BOX IF COLLECT

BULK	NO. SHIPPING UNITS	PKG. TYPE	HM*	DESCRIPTION OF ARTICLES, SPECIAL MARKS, AND EXCEPTIONS	NMFC ITEM NO	CLASS	WEIGHT (LB) SUBI. TO CORR
	1	CTN	X	RG: UN3332, RADIOACTIVE MATERIAL, TYPE A PACKAGE SPECIAL FORM, 7, NON-FISSILE OR FISSILE EXPECTED Cs-137, 300 MBq (8mCi), Am-241, 1.48 GBq (40mCi) Yellow II, TRANSPORT INDEX 0.3	164900	70	50

Note 1 - Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property. The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding:
 \$ 5500.00 per 1 Gauge

Note 2 - Liability limitation for loss or damage on this shipment may be applicable. See 49 U.S.C. 14706(d)(1)(A) and (B).

Note 3 - Commodities requiring special or additional care or attention in handling or stowing must be so marked and packaged as to ensure safe transportation with ordinary care. See Sec. 2(e) of NMFC Item 350.

SPECIAL INSTRUCTIONS
 Subject to Section 7 of the conditions, if this shipment is to be delivered to the consignee without recourse on the consignor, the consignor shall sign the following statement. The carrier shall not make delivery of this shipment without payment of freight and all other charges.

 (Signature of Consignor)

RECEIVED, subject to individually determined rates or contracts that have been agreed upon in writing between the carrier and shipper, if applicable, otherwise to the rates, classifications and rules that have been established by the carrier and are available to the shipper, on request, the property described above in apparent good order, except as noted (contents and condition of contents of packages unknown), marked consigned, and is destined as indicated above which said carrier (the word carrier being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry it to its usual place of delivery at said destination, and as to each party at any time interested in all or any of said property, that every service to be performed hereunder shall be subject to all the terms and conditions of the Uniform Bill of Lading set forth in the National Motor Freight Classification 100-X and successive issues.

Shipper hereby certifies that he is familiar with all of the terms and conditions in the said bill of lading including those on the back thereof and the said terms and conditions are hereby agreed to by shipper and accepted for himself and his assigns.
 The shipper also certifies that the above-named materials are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation according to the applicable regulations of the Department of Transportation.

SHIPPER	Gary Consulting Services, Inc.	CARRIER	<i>[Signature]</i>
PER	<i>[Signature]</i>	PER	<i>[Signature]</i> 6-17-11

* Mark with an 'X' to designate Hazardous Material as defined in Title 49 of the Code of Federal Regulations, and insert Shipper's Haz-Mat Emergency Phone No.



SHIPPER'S DECLARATION FOR DANGEROUS GOODS

Shipper
 TROXLER ELECTRONIC LABORATORIES, INC.
 3008 CORNWALLIS ROAD
 RESEARCH TRIANGLE PARK, NC. 27709
 USA

Air Waybill No. 976323000719

Page 1 of 1 Pages *KMBDLA*

Shipper's Reference Number

WC18861

Consignee
 GARG CONSULTING SERVICES
 2096 A SILAS DEANE HIGHWAY
 ROCKY HILL, CT 06067
 ATTN: ZHEN ZHOU



Two completed and signed copies of this Declaration must be handed to the operator

WARNING

Failure to comply in all respects with the applicable Dangerous Goods Regulations may be in breach of the applicable law, subject to legal penalties.

TRANSPORT DETAILS

This shipment is within the limitations prescribed for: (delete non applicable)

Airport of Departure

RTP

PASSENGER AND CARGO AIRCRAFT
 CARGO AIRCRAFT ONLY

Airport of Destination: *Rocky Hill KMBDLA*

Shipment type: (delete non-applicable)

XXXXXXXXXXXX RADIOACTIVE

NATURE AND QUANTITY OF DANGEROUS GOODS

UN Number or Identification Number, Proper Shipping name, Class or Division (subsidiary risk), Packing Group (if required), and all other required information.

RQ, UN 3332, Radioactive Material, Type A
 Package, Special Form, 7
 Cs-137 0.30 GBq/Am-241 1.48 GBq
 All packed in 1 type A package
 Yellow II, TI = 0.3, Dims 75x35x42 cm

1 box @ 89lbs.

Additional Handling Information This shipment may be carried on passenger aircraft outside the U.S. jurisdiction.

ICAO/IATA USED

Emergency response sheet attached to Dangerous Goods Declaration.

Emergency Telephone Number (1) 919-549-9539

24 HOUR

TROXLER ELECTRONICS

I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labelled/placarded, and are in all respects in proper condition for transport according to applicable International and National Governmental Regulations. I declare that all of the applicable air transport requirements have been met.

Name/Title of Signatory

W. Porterfield

/Shipper

Place and Date

RTP, NC

July 13, 2011

Signature (see warning above)

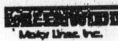
Wade Porterfield

STRAIGHT BILL OF LADING ORIGINAL - NOT NEGOTIABLE

PAULA

RL CARRIERS

PLEASE PLACE PRO LABEL HERE



(800) 543-5589

www.gorlc.com

Tracking # 021 460 599

Driver got by phone to PAULA

P.O. BOX 271 WILMINGTON, OHIO 45177-0271

DATE: 8/18/2011	CONSIGNEE PHONE: 1-877-TROXLER 860-563-0582	SHIPPER'S PHONE: 860-563-0582
TO: CONSIGNEE: TROXLER ELECTRONIC LABS	FROM: SHIPPER: GARG CONSULTING SERVICES, INC. (GARG20)	
ADDRESS: 3008 CORNWALLIS ROAD	ADDRESS: 2096A SILAS DEANE HWY.	
CITY: RESEARCH TRIANGLE PARK STATE: NC ZIP CODE: 27709	CITY: ROCKY HILL STATE: CT ZIP CODE: 06033	
HAZ-MAT EMERGENCY PHONE NO.: 860-328-0851		

BILL TO: THIRD PARTY

ADDRESS:

CITY: STATE: ZIP CODE:

SHIPPER'S NO. GARG20

PURCHASE ORDER NO.:

QUOTE NO.:

COD TOTAL AMOUNT \$

Check Appropriate Box: Certified Check Company Check

On a Collect On Delivery shipment(s), the letters "COD" must appear before consignee's name or as otherwise provided in item 430, Sec. 1.

Shipper Consignee

REMIT COD TO:

ADDRESS:

CITY: STATE: ZIP CODE:

FREIGHT CHARGES ARE PREPAID unless marked collect CHECK BOX IF COLLECT

BULK	NO. SHIPPING UNITS	PKG. TYPE	HM*	DESCRIPTION OF ARTICLES, SPECIAL MARKS, AND EXCEPTIONS	NMFC ITEM NO	CLASS	WEIGHT (LB) SUBJ. TO CORR
	1	CTN	X	RQ: UN3332, RADIO ACTIVE MATERIAL, TYPE A PACKAGE SPECIAL FORM, 7, NON-FISSILE OR FISSILE EXPECTED Cs-137, 300 MBq (8 mCi); Am-241, 1.48 GBq (40mCi) Yellow II, TRANSPORT INDEX 0.3	164900	70	50

Note 1 - Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property. The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding:
\$ 5500 per 1 GAUGE

Note 2 - Liability limitation for loss or damage on this shipment may be applicable. See 49 U.S.C. 14706(d)(1)(A) and (B).

Note 3 - Commodities requiring special or additional care or attention in handling or stowing must be so marked and packaged as to ensure safe transportation with ordinary care. See Sec. 2(e) of NMFC Item 360.

SPECIAL INSTRUCTIONS

Subject to Section 7 of the conditions, if this shipment is to be delivered to the consignee without recourse on the consignor, the consignor shall sign the following statement. The carrier shall not make delivery of this shipment without payment of freight and all other charges.

(Signature of Consignor)

RECEIVED, subject to individually determined rates or contracts that have been agreed upon in writing between the carrier and shipper, if applicable, otherwise to the rates, classifications and rules that have been established by the carrier and are available to the shipper, on request; the property described above in apparent good order, except as noted (contents and condition of contents of packages unknown), marked consigned, and is destined as indicated above which said carrier (the word carrier being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry it to its usual place of delivery at said destination, and as to each party at any time interested in all or any of said property, that every service to be performed hereunder shall be subject to all the terms and conditions of the Uniform Bill of Lading set forth in the National Motor Freight Classification 100-X and successive issues.

Shipper hereby certifies that he is familiar with all of the terms and conditions in the said bill of lading including those on the back thereof and the said terms and conditions are hereby agreed to by shipper and accepted for himself and his assigns.

The shipper also certifies that the above-named materials are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation according to the applicable regulations of the Department of Transportation.

SHIPPER: GARG CONSULTING SERVICES, INC.	CARRIER: [Signature]	DATE: 8-18-11
PER: [Signature]	PER: [Signature]	

* Mark with an 'X' to designate Hazardous Material as defined in Title 49 of the Code of Federal Regulations, and insert Shipper's Haz-Mat Emergency Phone No.

SHIPPER'S DECLARATION FOR DANGEROUS GOODS

Shipper
TROXLER ELECTRONIC LABORATORIES, INC.
3008 CORNWALLIS ROAD
RESEARCH TRIANGLE PARK, NC. 27709
USA

Air Waybill No. 976323002869
Page 1 of 1 Pages
Shipper's Reference Number WO19452
KIMBOLA

Consignee
GARG CONSULTING SERVICES
ZHEN ZHOU
2096 A SILAS DEANE HWY
ROCKY HILL, CT 06067
860-257-8373



Two completed and signed copies of this Declaration must be handed to the operator

WARNING Fed Account # 027600204
Failure to comply in all respects with the applicable Dangerous Goods Regulations may be in breach of the applicable law, subject to legal penalties.

TRANSPORT DETAILS

This shipment is within the limitations prescribed for: (delete non applicable)
Airport of Departure: *RTP*
Airport of Destination:

<input checked="" type="checkbox"/> PASSENGER AND CARGO AIRCRAFT	<input type="checkbox"/> CARGO AIRCRAFT ONLY
--	--

Shipment type: (delete non-applicable)
XXXXXXXXXXXXX RADIOACTIVE

NATURE AND QUANTITY OF DANGEROUS GOODS

UN Number or Identification Number, Proper Shipping name, Class or Division (subsidiary risk), Packing Group (if required), and all other required information.

RQ, UN 3332, Radioactive Material, Type A
Package, Special Form, 7
Cs-137 0.30 GBq/Am-241 1.48 GBq
All packed in one type A package
Yellow II, TI = 0.3, Dims 75x35x42 cm

1 @ 89LBS

Additional Handling Information This shipment may be carried on passenger aircraft outside the U.S. jurisdiction.

ICAO/IATA USED
Emergency response sheet attached to Dangerous Goods Declaration.
Emergency Telephone Number (1) 919-549-9539
24 HOUR TROXLER ELECTRONICS

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Name/Title of Signatory
J. Shaw /Shipper
Place and Date
RTP, NC October 25, 2011
Signature (see warning above)
J. Shaw