

Kime, Traci

From: Rolf Meinholtz <Rolf.Meinholtz@EnvironicsUSA.com>
Sent: Monday, December 17, 2012 12:04 PM
To: Struckmeyer, Richard
Subject: RE: Request for additional information letter Aug 14th 2012 - Mail control# 577981

Richard

Digging back and looking at the letters in section 15 with the different criteria I guess that I am going to have to say that the suggestion below are what I can come up with.

D: Adds the M-90 onto license 45-25594-01 and acts to close the other license that the M-90 was on. That way all the products would be under one license. Since this has been incorporated and then morphed into the current license I was thinking it could go. But as a reference now I am not sure...

E: Answers to questions from item D. if able to drop D then could drop it, if D must stay then it has to stay as reference.

F: Answers to questions from item D. if able to drop D then could drop it, if D must stay then it has to stay as reference.

G: Cannot find my note, I thought it was the notification of Mike Phillips leaving Envionics, if I am right then it can be dropped.

I: needs to be kept.

Rolf Meinholtz

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From: Struckmeyer, Richard [mailto:Richard.Struckmeyer@nrc.gov]
Sent: Monday, December 17, 2012 10:41 AM
To: Rolf Meinholtz
Subject: RE: Request for additional information letter Aug 14th 2012 - Mail control# 577981

The RSO issue is probably more of a concern for the state (possession and use license). I don't know whether NRC inspectors check the frequency of training for an RSO in conjunction with an exempt-distribution license. It seems unlikely because there is no requirement to list the RSO on an exempt-distribution license. You could look at your previous NRC inspection report to find the name of the inspector, and ask him or her by phone or email.

From: Rolf Meinholtz [<mailto:Rolf.Meinholtz@EnvironicsUSA.com>]
Sent: Monday, December 17, 2012 10:26 AM
To: Struckmeyer, Richard
Subject: RE: Request for additional information letter Aug 14th 2012 - Mail control# 577981

Richard

I am working on it now,

Other question that has just attached me is, the RSO continuing education class that I was going to go to was canceled since they did not get enough to fill the class. Will I be in huge trouble if I do not get it done this calendar year? Probably get it done in the first quarter of 2013.

Rolf Meinholtz

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From: Struckmeyer, Richard [<mailto:Richard.Struckmeyer@nrc.gov>]
Sent: Monday, December 17, 2012 10:11 AM
To: Rolf Meinholtz
Subject: FW: Request for additional information letter Aug 14th 2012 - Mail control# 577981

Mr. Meinholtz:

I need to get a response to my question from Dec. 3 (highlighted below). Our deadline for completing the work on your renewal request is only about a month away.

Thank you,

Richard K. Struckmeyer
Division of Materials Safety and State Agreements
Office of Federal and State Materials and Environmental Management Programs
U.S. Nuclear Regulatory Commission
301-415-5477

From: Struckmeyer, Richard
Sent: Monday, December 03, 2012 9:36 AM
To: 'Rolf Meinholtz'
Subject: RE: Request for additional information letter Aug 14th 2012 - Mail control# 577981

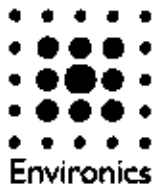
How about the other documents you mentioned?

From: Rolf Meinholtz [<mailto:Rolf.Meinholtz@EnvironicsUSA.com>]
Sent: Monday, December 03, 2012 9:12 AM
To: Struckmeyer, Richard
Subject: RE: Request for additional information letter Aug 14th 2012 - Mail control# 577981

Richard
With that description, then it needs to stay in. I was thinking once it is added to the license then it was included. My confusion.

Rolf Meinholtz

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From: Struckmeyer, Richard [<mailto:Richard.Struckmeyer@nrc.gov>]
Sent: Monday, December 03, 2012 9:06 AM
To: Rolf Meinholtz
Subject: RE: Request for additional information letter Aug 14th 2012 - Mail control# 577981

Mr. Meinholtz:

Can you take another look at the documents you proposed for deletion, keeping in mind that if a document contains the basis for describing a device that is authorized on the license, it should only be deleted if it has been superseded by a more recent document, or if you no longer distribute the device. (If a device no longer distributed, you should have sent us an amendment request to have it removed from the license.)

Your email of November 30, 2012, appears to indicate that the ChemPro100i is still being distributed.

I don't want to make this any more difficult for you than it already is, but (unfortunately) it is the licensee's responsibility to ensure that the information on the license accurately describes its program.

Thank you for your continued cooperation.

Richard K. Struckmeyer
Division of Materials Safety and State Agreements
Office of Federal and State Materials and Environmental Management Programs
U.S. Nuclear Regulatory Commission
301-415-5477

From: Rolf Meinholtz [<mailto:Rolf.Meinholtz@EnvironicsUSA.com>]
Sent: Friday, November 30, 2012 6:01 PM
To: Struckmeyer, Richard
Subject: RE: Request for additional information letter Aug 14th 2012 - Mail control# 577981

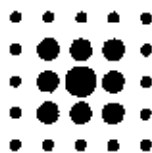
Richard

This is the amendment request to add the ChemPro100 ver 3 as a update for the license. This is now referred to as the ChemPro100i. This has a date of 12-13-2006 as being sent to Thomas Herra.

This information has been added into the current license so I was thinking it could be dropped...

Rolf Meinholtz

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Environics

From: Struckmeyer, Richard [<mailto:Richard.Struckmeyer@nrc.gov>]
Sent: Tuesday, November 27, 2012 9:48 AM
To: Rolf Meinholtz
Subject: RE: Request for additional information letter Aug 14th 2012 - Mail control# 577981

Mr. Meinholtz:

I was out of the office for two weeks, and am just now getting back to reviewing your application.

It is likely I will have additional questions, but for now just one: Can you take a look at the document shown as letter "I" under License Condition 15 ("Letter received December 14, 2006") and tell me that actual date of the document?

I need to look at each document that you proposed deleting to make sure that I agree with your assessment.

Thank you

From: Rolf Meinholtz [<mailto:Rolf.Meinholtz@EnvironicsUSA.com>]
Sent: Friday, November 09, 2012 5:41 PM
To: Struckmeyer, Richard
Subject: RE: Request for additional information letter Aug 14th 2012 - Mail control# 577981

Mr Struckmeyer

I have to apologize for the delay. I have been pulled out of the office on support issues and repairs for the industrial products quite a bit, and when I am in the office I have been buried with everything... And I know that that is not an acceptable answer or what you want to hear but again I am Sorry. Some of the problems have now hopefully been killed or cut to a size that this will not be a problem in the future.

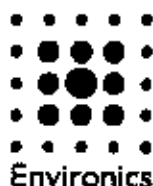
I have attached to this email a PDF file (once I finally got Adobe to work correctly and make the file readable,) that basically is a new renewal application for the sake of clarity. Please take a look at the attached and let me know if there is something that I have missed. Also I will bow to your judgment to either consider this a resubmission or clarification to the existing document that you already have. Basically chose which ever route is easier and let me know if there is more that I have to provide.

I have also dug back in the files and researched the old correspondences and determined those that have either been superseded or incorporated into the current licenses and can be deleted.

I have sent a hardcopy of the attached document to you also, UPS # is 1z17ae340293142813. Please take a look
an

Rolf Meinholtz

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From: Struckmeyer, Richard [<mailto:Richard.Struckmeyer@nrc.gov>]
Sent: Thursday, November 08, 2012 4:16 PM
To: Rolf Meinholtz
Subject: RE: Request for additional information letter Aug 14th 2012 - Mail control# 577981

Mr. Meinholtz:

As far as I know we still have not received any reply to our request for additional information dated August 14, 2012.

Please provide your reply as soon as possible so that we can act upon your request for license renewal.

Thank you,

Richard K. Struckmeyer
Division of Materials Safety and State Agreements
Office of Federal and State Materials and Environmental Management Programs
U.S. Nuclear Regulatory Commission
301-415-5477

From: Rolf Meinholtz [<mailto:Rolf.Meinholtz@EnvironicsUSA.com>]
Sent: Friday, September 28, 2012 5:48 PM
To: Struckmeyer, Richard
Subject: RE: Request for additional information letter Aug 14th 2012 - Mail control# 577981

Richard

Sorry, my fault. I have been swamped at the office and have not gotten it all together. I will get back to you next week.

Rolf Meinholtz

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Environics

From: Struckmeyer, Richard [<mailto:Richard.Struckmeyer@nrc.gov>]
Sent: Monday, September 24, 2012 1:24 PM
To: Rolf Meinholtz
Subject: FW: Request for additional information letter Aug 14th 2012 - Mail control# 577981

Mr. Meinholtz:

I am resending this because it has been more than 30 days and I have not gotten a reply.

Please reply as soon as possible, even if you don't have a complete response prepared, and let me know when you expect to have it ready.

Thank you

From: Struckmeyer, Richard
Sent: Monday, August 20, 2012 10:40 AM
To: 'Rolf Meinholtz'
Subject: RE: Request for additional information letter Aug 14th 2012 - Mail control# 577981

Mr. Meinholtz:

It is difficult for me to say whether you should submit a new renewal package. From a regulatory viewpoint, it is not necessary to do so. It should be possible to resolve the issues by responding to our requests for additional information. However, if you would like to resubmit for the sake of clarity, you are certainly welcome to do so.

Any documents listed in Item 15 that have been entirely superseded should be deleted. If portions of a given document are out of date but other portions are still applicable, you can identify those in your renewal application.

In your email you stated "...there have been updates and expansions to these items that reflect the expansion of the Product list...." For the purposes of your exempt-distribution license renewal, you should be explicit regarding any changes to anything listed on the license.

You also stated "...or reflect changes to certain documents..." If you choose to use the second option, you must specify what has changed. It is not sufficient to submit the revised documents without indicating what changes were made. (In any case, it does not appear that the documents you provided for parts 7 – 11 would have any applicability to the exempt-distribution license renewal.)

On a related topic, I just noticed that the current license lists americium-241 and hydrogen-3. Do you plan to begin distributing any devices containing nickel-63 in the United States? If not, it would not be appropriate to list this radionuclide as one of the responses to section 5 of the application.

Let me know if you have further questions.

Thank you,

Richard K. Struckmeyer
Division of Materials Safety and State Agreements
Office of Federal and State Materials and Environmental Management Programs
U.S. Nuclear Regulatory Commission
301-415-5477

From: Rolf Meinholtz [<mailto:Rolf.Meinholtz@EnvironicsUSA.com>]
Sent: Friday, August 17, 2012 10:47 AM
To: Struckmeyer, Richard
Subject: RE: Request for additional Information letter Aug 14th 2012 - Mail control# 577981

Re: Mail Control # 577981

Mr. Struckmeyer

I missed the point that items 7-11 on NRC form 313 were for Possession and use and would not be applicable to the renewal of the exempt distribution license. I had sent you these items based on the fact that there have been updates and expansions to these items that reflect the expansion of the Product list, or reflect changes to certain documents. (I read too much into the requirements, sorry about that...)

If I use the 2nd option will you wish me to resubmit a new renewal package that only covers items 1-6, 12 and 13 for the sake of clarity?

Regarding the items listed in Condition 15 of the current license, yes several have been superseded by later correspondence but I thought they were retained in condition 15 as a history. What are the procedures to remove certain of these items after research and determination of their relevance.

Rolf Meinholtz

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