HURON
ENGINEERING & SURVEYING, INC.

3205 US-23 South
Alpena, MI 49707
Ph: 989-356-6375
Fax: 989-354-8286

March 29, 2013

Ms. Sara Forster
Health Physicist Licensing Reviewer
USNRC
2443 Warrenville Rd., Ste. 210
Lisle, IL 60532-4352

RE: Request for Additional Information

Dear Ms. Forster,

This letter is in response to your request for additional information for the licensing application that was submitted in February and has been assigned a Mail Control Number of 579994. The additional information requested was for a statement which was missing in Item 7 of the NRC Form 313. Also a statement has been added into Item 3 of that same form stating the number of density gauges we intend to possess. The updated NRC Form 313 with this information has been included with this letter. In addition to the above information Item 6 has been updated to list out the exact density gauge models that will be covered by the license.

As an additional request you had asked for a copy of a certificate showing that I had some type of training with the use of a troxler gauge. I have included a copy of the certificate that I received from the Density Training that I received at Ferris State through the Michigan Department of Transportation training program. With this letter I have included a copy of the RSO training certificate for Dale Saranen along with a statement letter showing that Dale has agreed to be an assistant RSO with the company. I know that it is not a requirement nor is it necessary for the license but I felt it was in the best interest of the company to have an assistant and it is supporting documentation for our license that there is more than one competent person in charge of the density gauges.

I hope that this updated information will satisfy the requirements for the new license application. If there is a need for more information beyond what I have provided please do not hesitate to contact me. I look forward to hearing from you soon regarding the status of our new license application.

Sincerely,
Huron Engineering and Surveying, Inc.

Mark V. Herman, RSO
Vice-President

MDOT Michigan Department of Transportation

FERRIS STATE UNIVERSITY

Institute for Construction Education and Training

MDOT Michigan Department of Transportation

HEREBY CERTIFIES THAT

Mark V. Herman

Has demonstrated the ability and understanding of Density Technology, and is therefore qualified to perform the following tests:

- Density In-Place (Nuclear)
- One-Point Michigan Cone
- One Point T-99
- Michigan Modified T-180
- Speedy Moisture Gage (Clay and Granular)

EXPIRES: March 31, 2015

IDENTIFICATION NUMBER: 11181-0315

Richard Endres, P.E.
Supervising Engineer
Michigan Department of Transportation

Michael Neuman, Managing Director
Michigan Mineral Resources Association

Brenda J. O'Brien, P.E.
Michigan Department of Transportation

HURON
ENGINEERING & SURVEYING, INC.

I, Dale Saranen accept the duties and responsibilities of Assistant Radiation Safety officer for Huron Engineering and Surveying, Inc. I am a certified Nuclear gauge user and have completed the InstroTek Radiation Safety Officer training and understand the duties and responsibilities assigned to me.

Sincerely,
Huron Engineering and Surveying, Inc.

Dale Saranen
Assistant RSO

InstroTek, Inc.

Radiation Safety Officer Training

Dale Saranen

Has successfully completed a certified course on the responsibilities of Radiation Safety Officer for portable nuclear gauges using special form nuclear material.

Subjects included were:

Responsibilities of Radiation Safety Officer
Commercial shipping of portable nuclear gauges
Applicable 10 CFR Regulations
Portable nuclear gauge security
Records for tracking and logging portable gauges
Unit Conversions
Applying for nuclear materials license
Radiation Safety Program
Applicable 49 CFR Regulations
NUREG 1556 Vol. 1 Rev. 1
Records for Dosimetry
Dose calculations and calculators
Decay calculations and calculators
Amending nuclear materials license

InstroTek, Inc.
5908 Triangle Dr.
Raleigh, NC 27617
(919) 875-8371

Instructor: Sean Reilly
Date of Training: 04/12/2012
Location: Concord, CA

Attachment to Form 313

Item 3. Address Where Licensed Material Will Be Used And Possessed.

3205 US-23 South, Alpena, Michigan and may be used at temporary job sites of the licensee anywhere in the United States where the U.S. Nuclear Regulatory Commission maintains jurisdiction for regulating the use of licensed material. It is the businesses intent to have up to five (5) density gauges which is the basis for the answers to Item 5 below.

Item 5. Radioactive Material

A. Cesium -137

A. Sealed sources registered either with NRC under 10 CFR 32.210 or with an Agreement State and incorporated in a compatible gauging device.

A. No single source to exceed the maximum activity specified in the certificate of registration issued by NRC or an Agreement State. Total possession limit of 40 millicuries.

B. Americium-241

B. Sealed sources registered either with NRC under 10 CFR 32.210 or with an Agreement State and incorporated in a compatible gauging device as specified in Item 9 of this license

B. No single source to exceed the maximum activity specified in the certificate of registration issued by NRC or an Agreement State. Total possession limit of 200 millicuries.

Item 6. Purpose(s) for which licensed material will be used.

A and **B**. Listed above to be used in Troxler Models 3411B, 3430, 3440, 3450 and Instrotek 3500 Xplorer moisture/density gauges for the measurement of moisture and density in construction material.

Item 7. Individual(s) Responsible for Radiation Safety Program and Their Training and Experience.

Mark Herman has completed approved Gauge Safety Certification training, HAZMAT, and RSO training. Mr Herman has practical field experience of using the density gauges for the last 3 years. Mr. Herman worked closely with the assistant RSO for Wilcox Associates for the last 3 years. Mr. Herman is a principal in the firm. He has successfully completed one of the training courses described in the Criteria in the section entitled "Individual(s) Responsible for Radiation Safety Program and their Training and Experience-Radiation Safety Officer" in NUREG-1556 Vol. 1, Rev. 1, dated November 2001. In addition, future RSO's will have completed one of the training courses described in the above mentioned section.

Item 8. Training for Individuals Working in or Frequenting Restricted Areas (Instructions to Occupationally Exposed Workers and Ancillary Personnel).

Before using licensed materials (gauges), authorized users will have successfully completed training as described in NUREG 1556, Vol. 1, Rev. 1, dated November 2001.

Item 9. Facilities and Equipment
I have pre-determined that our storage area will comply to public dose limits and that we are providing sufficient security and control over the gauges. These have been calculated and covered in our Radiation Safety Program under "Public Dose" and also in our "Operating and Emergency Procedures".

Item 10. Radiation Safety Program
Although there is no response required for this item – We have a Radiation Safety program with Emergency Response completed.

Item 10.1 Audit Program
Need not be submitted with application.

Item 10.2 Termination of Activities
Need not be submitted with application.

Item 10.3 Instruments
We will either possess and use, or have access to and use, a radiation survey meter that meets the criteria in the section entitled 'Radiation Safety Program—Instruments' in NUREG-1556, Vol. 1 Rev. 1, 'Consolidation Guidance about Materials Licenses: Program-Specific Guidance about Portable Gauge Licenses, 'dated November 2001, in the event of an incident".

Item 10.4 Material Receipt and Accountability
Physical inventories will be conducted at intervals not to exceed 6 months, to account for all sealed sources and devices received and possessed under the license.

Item 10.5 Occupational Dosimetry
Either we maintain, for inspection by NRC, documentation demonstrating that unmonitored individuals are not likely to receive, in one year, a radiation dose in excess of 10 percent of the allowable limits in 10CFR Part 20, or we provide dosimetry processed and evaluated by an NVLAP-approved processor that is exchanged at a frequency recommended by the processor.

Item 10.6 Public Dose
Need not be submitted with application.- Public does calculation have been completed and are less than all the requirements.

Item 10.7 Operating and Emergency Procedures

Operating and Emergency procedures are developed, implemented and maintained, and meet the criteria in the section entitled 'Radiation Safety Program-Operating and Emergency Procedures' in NUREG-1556, Vol.1,Rev.1, 'Consolidated Guidance about Materials Licenses: Program-Specific Guidance about Portable Gauge Licenses,' dated November 2001.

Item 10.8 Leak Tests

Leak tests 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.

Item 10.9 Maintenance

Routine cleaning and lubrication- We have implemented and maintain procedures for routine maintenance of our gauges according to each manufacture's recommendations and instructions.

Non-routine maintenance or repair operations that require detaching the source or source rod from the gauge- We send the gauge to the manufacturer or other person authorized by NRC or an Agreement State to perform non-routine maintenance or repair operations that require detaching the source or source rod from the gauge.

Item 10.10 Transportation

Need not be submitted with application.- We are familiar with the requirements for transporting the Density Gauges.

Item 11 Waste Management – Gauge Disposal and Transfer

Need not be submitted with application.- We are familiar with disposal and transfer methods and options. We will always check beforehand that the gauge recipient is authorized to take possession of our gauge type. We will keep all disposal and transfer records on file.

Forster, Sara

From: Mark Herman <Mark.Herman@huronesi.com>
Sent: Friday, March 29, 2013 12:21 PM
To: Forster, Sara
Cc: dale.saranen@huronesi.com
Subject: Additional Information
Attachments: NRC313 additional information 3-27-13.pdf; Cover-Letter-3-29-2013.pdf; Dale-Assistant-RSO.pdf; Mark-Training-Cert.pdf

Sara,

Attached you will find a signed cover letter along with the attachments that I had sent previously. Please do not hesitate to contact me if you have any questions.

Thank you,
Mark

Mark V. Herman, P.S.
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Alpena, MI 49707
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