

LOCHNER

H.W. Lochner, Inc.
225 West Washington Street
12th Floor
Chicago, IL 60606

T 312.372.7346
F 312.372.8208

hwlochner.com

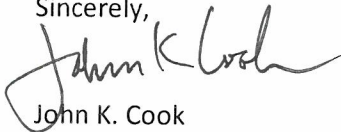
Mr. Michael Reichard
Health Physicist
U.S. NRC, Region I
Division of Nuclear Materials Safety
2100 Renaissance Blvd, Suite 100
King of Prussia, PA 19406

RE: License # 12-28232

Dear Michael,

Please find attached a revised Safety Program for the Lochner Nuclear Materials license renewal that was submitted recently. I have highlighted the three references you mentioned to me on our call in February regarding critical missing info from our renewal application. Please let me know if these changes will bring us in compliance with the licensing requirements for our Troxler gauges.

Sincerely,



John K. Cook
Radiation Safety Officer
Director of Human Resources

USNRC License 12-28232-01

3. Locations :

Licensed material shall be held and stored only at the licensee's facilities located at: 2110 Silas Deane Highway, Rocky Hill CT, 06067, 424 Chapel Street, New Haven, CT 06511 and 903 E 104th St., 1st Floor Storage Room, Kansas City, MO 64131 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 materials.

5: Radioactive Material:

A. Cesium – 137	Sealed Sources registered either with NRC under 10CFR32.210 or with an agreement state and incorporated in a compatible gauging device as specified in Item 9 of the license	No Single Source to exceed the maximum activity specified in the certificate of registration issued by the NRC or an agreement state. Total Activity not to exceed 117 millicuries.
B. Americium – 241	Sealed Sources registered either with NRC under 10CFR32.210 or with an agreement state and incorporated in a compatible gauging device as specified in Item 9 of the license	No Single Source to exceed the maximum activity specified in the certificate of registration issued by the NRC or an agreement state. Total Activity not to exceed 572 millicuries.

6. Purpose:

A and B: To be used in Troxler Electronics Labs Model 3400 series surface moisture/density gauges, portable gauging devices used for measuring physical properties of materials.

7. Responsible Individuals:

The Radiation Safety officer for this License is John K. Cook. Mr. Cook completed Troxler Nuclear Gauge Safety Training, USDOT Hazmat Training and Troxler RSO training for portable gauges in April 2012. Gauges will be stored at the following locations: 2110 Silas Deane Highway, Rocky Hill CT. 06067 and 424 Chapel Street, New Haven, CT 06511 and at 903 E. 104th St., 1st Floor Storage Room, Kansas City, MO 64131. In addition to Mr. Cook, the firm has two site RSO's in Connecticut and Missouri, Christopher Hylas and Christopher Flageolle respectively. Each of them has received Troxler RSO training as well.

8. Training for Individuals:

All Gauge operators have received Troxler Nuclear Gauge Safety Training and Hazmat certification from the DOT . RSO's have completed Troxler's Radiation Safety Officer Training.

9. Facilities and Equipment – See #10.

10. Safety Program:

A. Licensed Material will only be used by, or under the supervision and in the physical presence of individuals who have received the training described above.

B. Sealed sources shall be tested for leakage and/or contamination at intervals not to exceed the intervals specified in the certificate of registration issued by NRC under 10CFR 32.210 or by an agreement state.

C. In the absence of a certificate from a transferor indicating that a leak test has been made within the intervals specified in the certificate of registration issued by NRC under 10 CFR 32.210 or by an agreement state prior to the transfer, a sealed source or detector cell received from another person shall not be put into use until tested.

D. Sealed sources need not be tested if they are in storage and are not being used. However, when they are removed from storage for use or transferred to another person, and have not been tested within the required lead test interval, they shall be tested before use or transfer. No sealed source shall be stored for a period of more than 10 years without being tested for leakage and/or contamination.

E. The leak test shall be capable of detecting the presence of 0.005 micro curie of radioactive material on the test sample. If the test reveals the presence of 0.005 micro curie or more of removable contamination, a report shall be filed with the USNRC in accordance with 10 CFR 30.50(c) (2)., and the source shall be removed immediately from service and decontaminated, repaired, or disposed of in accordance with Commission regulations.

F. Tests for leakage and/or contamination shall be performed by persons specifically licensed by the Commission or an Agreement State to perform such services. In addition, the licensee is authorized to collect leak test samples but not perform the analysis: Analysis of lead samples must be performed by persons specifically licensed by the Commission or an agreement state to perform such services.

G. Records of leak test results shall be kept in units of micro curies and shall be maintained for 3 years.

H. Survey 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, dated November 2001.

I. Occupational Dosimetry: We will maintain for inspection by NRC, documentation demonstrating that unmonitored individuals are not likely to receive a radiation dose in excess of 10 percent of the allowable limits in 10 CFR Part 20.

J. Operating and Emergency Procedures: Operating and emergency procedures will be developed, implemented and maintained and will meet the criteria in the section entitled "Radiation Safety Program – Operating and Emergency Procedures" in NUREG-1556, Vol. 1, Rev. 1, dated November 2001.

K. Sealed sources or source rods containing licensed material shall not be opened or sources removed or detached from source rods or gauges by the licensee, except as specifically authorized.

L. Except for maintaining labeling as required by 10 CFR Part 20 or 71, the licensee shall obtain authorization from the NRC before making any changes in the sealed source, device, or source-device combination that would alter the description or specifications as indicated in the respective Certificates of Registration issued by the Commission pursuant to 10 CFR 32.210 or by an agreement state.

M. The licensee shall conduct a physical inventory every 6 months, or at other intervals approved by the USNRC, to account for all sources and/or devices received and possessed under the license.

N. Each portable nuclear gauge shall have a lock or outer locked container designed to prevent unauthorized or accidental removal of the sealed source from its shielded position. The gauge or its container must be locked when in transport. A minimum of two independent physical controls that form tangible barriers to secure portable gauges from unauthorized removal whenever the portable gauge is not under the control and constant surveillance of the licensee is required.

O. Any cleaning, maintenance, or repair of the gauge(s) that requires removal of the source rod shall be performed only by the manufacturer or by other persons specifically licensed by the Commission or an agreement state to perform such services.

P. Except as specifically provided otherwise in this license, the licensee shall conduct its program in accordance with the statements, representation, and procedures contained in the documents, including any enclosures listed below. The U. S. Nuclear Regulatory Commission's regulations shall govern unless the statements, representations, and procedures in the licensee's application and correspondence are more restrictive than the regulations.

11. Waste Management: See 10 A – G above.