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**To:** [sportnoff@widetronix.com](mailto:sportnoff@widetronix.com)  
**Cc:** [Miller, John](#); [Reichard, Michael](#)  
**Subject:** application for a new license, Control No. 583285  
**Date:** Thursday, April 17, 2014 2:01:00 PM

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Widetronix, Inc  
License No. 31-35133-01  
Docket No. 030-38719  
Control No. 583285

Mr. Portnoff,

In order to continue review of your application for an NRC license to use materials at temporary job sites anywhere that the NRC has jurisdiction, we need additional information. Most of these issues were discussed with you during telephone conversations with John Miller (610-337-5089) and Michael Reichard (610-337-6945), who also are reviewing your application. If you have any questions, please contact them or me (610-337-5040).

1. Item 5 of you application states that the material is in the form of sealed sources or plated foils, however, you did not provide the manufacturer or model number of the sealed sources in accordance with 10 CFR 30.32(g). In addition, Item 10.11 states that the sealed sources or plated foils are not registered. As required by 10 CFR 30.32(g)(1), identify the manufacturer and model number as registered with the NRC pursuant to 10 CFR 32.210, or provide the information identified in 10 CFR 32.210(c) for the sealed sources or foils you are requesting for the license.
2. Item 5 of your application lists the maximum possession limit for all sealed sources or plated foils for each radionuclide. Please specify the maximum quantity of material in any given sealed source or plated foil, and the maximum total of material needed for possession of all sealed sources or plated foils, for each radionuclide.
3. Item 6 of you application requests authorization to take the licensed material in the form of power sources to temporary job sites for demonstrate their operability and effectiveness. Although Item 10 of you application includes many areas that are related to the use at temporary job sites, additional information is required as follows:
  - a. Item 9 states that licensed materials will remain under the direct control of an authorized Widetronix employee at all times at temporary job sites, and will not be left unattended at any time. Confirm if conditions might exist for secured storage at temporary job sites, in the event of the authorized worker taking a lunch break or other interruption, and provide appropriate procedures
  - b. Item 10.7.7 states that a physical inventory will be performed at 6-month intervals. However, there is no item that describes your procedures for tracking licensed materials that are shipped to temporary job sites, and

returned to the facilities. Typically, licensees that use materials at temporary job sites maintain a record of the material that was taken to the temporary job site, identifying it by serial number and the date and name of the individual responsible for the material at the temporary job site, and the date that the item was returned to storage. Confirm that you will develop procedures that track licensed materials that are in use at temporary job sites.

- c. Your procedures should include a means to ensure that the temporary job site is free of residual contamination from the sources used during your demonstration activities with the licensed materials. If you are not planning to perform surveys at the temporary job site, as indicated in Item 10.4.2.3 of your application, provide an alternate means of determining that facilities are free of contamination, or a justification including data, demonstrating that surveys are not required.

Item 7 of your application states that the Radiation safety Officer is Jeffrey Leavey. Mr. Leavey is currently the Radiation Safety of a Broad Scope program at Penn State University in University Park, PA.

- Identify other commitments of the consultant-RSO for other NRC or Agreement State licensed facilities, along with a description of how the consultant-RSO will allocate time to permit the performance of the duties of the RSO as described in the regulations. State the consultant-RSO's minimum amount of on-site time (hours per week).
  - Appoint an in-house representative who will serve as the point of contact during the RSO's absence. This person may be allowed to assist the consultant RSO with limited authority.
  - Describe the overall availability of the consultant-RSO to respond to questions or operational issues that arise during the conduct of your radiation safety program and related regulatory requirements. Specify the maximum amount of time it will take the RSO to arrive at the facility in the event of an emergency that requires his presence.
5. Item 9 of your application did not describe the instrumentation that you will use to perform contamination and leak test surveys. Please provide a description of the equipment that you will use.
  6. Please describe your instrument calibration procedures and the frequency of instrument calibration. If your instruments will be calibrated by the instrument manufacturer or a person specifically authorized by the U.S. Nuclear Regulatory

Commission or an Agreement State for instrument calibration, you only need to specify the name of the firm and the license number that authorizes the firm to perform calibration services, and the calibration frequency. If you intend to calibrate your own instruments, please submit your calibration procedures including calibration frequency. Appendix M of NUREG-1556, Volume 7 contains calibration procedures acceptable to the Commission and may be helpful to you in developing your response.

7. Please provide your leak test procedures. Appendix R of NUREG-1556, Volume 7 contains model leak test procedures and may be helpful to you in developing your response. If you select to have another person perform the leak test, please submit the name of the person and the license under which they are authorized to perform this activity.

Here is a link to the NUREG 1556, Volume 7 document: <http://www.nrc.gov/reading-rm/doc-collections/nuregs/staff/sr1556/v7/>

Please respond in writing. You may submit the signed response document by hard copy, or as a pdf copy attached to an email, or by facsimile to 610-337-5269. Please be sure to include the Control No. 583285 on your response. We would appreciate a response as soon as possible in order to expedite review of the license.

Thank you for your consideration,  
Betsy Ullrich

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