



CONVERSATION RECORD

03/12/2014

NAME OF PERSON(S) CONTACTED OR IN CONTACT WITH YOU Dennis Ream		DATE OF CONTACT 03/12/2014	TYPE OF CONVERSATION <input type="checkbox"/> E-MAIL <input checked="" type="checkbox"/> TELEPHONE <input type="checkbox"/> INCOMING <input checked="" type="checkbox"/> OUTGOING
E-MAIL ADDRESS dream@bowser-morner.com		TELEPHONE NUMBER (937) 236-8805	

ORGANIZATION Radiation Safety Officer Bowser-Morner, Inc.	DOCKET NUMBER(S) 030-35052
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LICENSE NUMBER(S) 34-17390-02	CONTROL NUMBER(S) 582386
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SUBJECT  
Additional Information Needed for License Renewal

SUMMARY

This refers to your application to renew your license dated October 23, 2013, and the phone conversation between Dennis Ream and Jennifer Bishop on March 12, 2014.

During our review of your renewal application dated October 23, 2013, it appeared that your application had not been completely prepared in accordance with the guidance in NUREG 1556, Vol. 1, Rev. 1, "Consolidated Guidance about Materials Licenses: Program-Specific Guidance about Portable Gauge Licenses, dated November 2001." This has resulted in an application that contains numerous restrictive elements which we believe you would find difficulty complying with, if we were to include them in your license. In addition, several of the attachments that were provided as a part of the application would need to be updated if we were to include them as a part of your license. For example, the locations of NRC Regional offices listed in Attachment 10-1, 'Emergency Procedures,' have changed.

Also, NRC Form 313, Item 3, "Address of Use," you included several location address where material will be stored and used that are in Agreement States. Please note that the NRC does not regulate the use of materials in these locations and they will not be listed on your license.

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ACTION REQUIRED (IF ANY)

Please submit your response by March 28, 2014, and reference it to my attention as "additional information to control number 582386" to facilitate proper handling in our office. Your response must be currently dated and signed by a senior management representative. If you have any questions or require clarification of any of the information stated above, please do not hesitate to contact me at 630-829-9607

In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice," a copy of this letter and its enclosure will be available electronically for public inspection in the NRC Public Document Room or from the NRC's Agencywide Documents Access and Management System (ADAMS), accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html>.

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NAME OF PERSON DOCUMENTING CONVERSATION  
Jennifer L. Bishop

SIGNATURE

**CONVERSATION RECORD (continued)**

SUMMARY: (Continued from page 1)

Please note that certain sections of this NUREG have been modified since its last revision, as noted below:

A. We now require a total possession limit for each radionuclide requested, as well as providing the "per source" activity you need, which should match the Sealed Source and Device Registry certificate procured by the vendor. In reviewing your application, we noted that several gauge model you currently have listed on your license were not requested and the possession limit is higher than what is currently authorized.

RESPONSE: Please review your records and ensure all gauges models a correctly accounted for in your application. For any gauge models you no longer possess and wish to remove from your license, please provide the documentation the gauges have been properly transferred to a licensed entity and the most current leak test.

B. You will not be able to change and name your RSO internally; NRC must do that for you via the amendment process.

RESPONSE: Please include the name and qualifications of your proposed RSO and a written, signed (by both senior management and the proposed RSO) and a currently dated statement that stipulates your proposed RSO accepts the RSO position and understands the duties and responsibilities associated with the position. Each proposed RSO must be qualified in accordance with the guidance in NUREG 1556, Vol 1, Rev. 1, Section 8.7, Item 7: Individual(s) Responsible for Radiation Safety Program and Their Training and Experience.

In addition, the additional information will be needed:

A. In you current license, you are authorized to conduct your own leak testing analysis. However, in your application you stated that you would be using Troxler Leak Testing Kits to conduct leak test.

RESPONSE: If you plan to conduct your own leak testing, please provide the information in NUREG 1556, Vol. 1, Rev. 1, Appendix J, 'Requests to Perform Leak Testing and Sample Analysis.' If you do not plant to conduct your own leak testing analysis, please state in your application that leak testing will be conducted by an organization that is authorized to conduct leak testing analysis.

B. In you current license, you are authorized to conduct non-routine maintenance on the Troxler Model No. 3400 Series gauges that requires the removal of the source rod. However, in your application you stated that no maintenance or repairs will be conducted that requires removal of the sealed source.

RESPONSE: If you plan to conduct your own non-routine maintenance, please provide the information in NUREG 1556, Vol. 1, Rev. 1, Appendix G, 'Information Needed to Support Applicant's Request to Perform Non-Routine Maintenance.' If you do not plant to conduct your own non-routine maintenance, please state in your application that non-routine maintenance will be conducted by an organization that is authorized.

For guidance on preparing all licensing correspondence, please use NUREG 1556 Vol. 1, Rev. 1, "Consolidated Guidance About Materials Licenses - Program-Specific Guidance About Portable Gauge Licenses." This document can be found at:

<http://www.nrc.gov/reading-rm/doc-collections/nuregs/staff/sr1556/v1/r1/>

## **Appendix B**

### **Suggested Format for Providing Information Requested in Items 5 through 11**

**ITEMS 5 AND 6: MATERIALS TO BE POSSESSED AND PROPOSED USES**

Yes	No	Radioisotope	Manufacturer or Distributor Model No.	Quantity	Use As Listed on SSD Certificate	Specify Other Uses Not Listed on SSD Certificate
		Cesium-137	Sealed source manufacturer or distributor and model number: _____ Device manufacturer or distributor and model number: _____	Not to exceed either the maximum activity per source or maximum activity per device as specified in Sealed Source and Device Registration Certificate	Yes <input type="checkbox"/> Specific description of the gauge use: _____ _____ _____ _____ _____	<input type="checkbox"/> Not applicable _____ <input type="checkbox"/> Uses are: _____ (Submit safety analysis supporting safe use)
		Americium-241	Sealed source manufacturer or distributor and model number: _____ Device manufacturer or distributor and model number: _____	Not to exceed either the maximum activity per source or maximum activity per device as specified in Sealed Source and Device Registration Certificate	Yes <input type="checkbox"/> Specific description of the gauge use: _____ _____ _____ _____ _____	<input type="checkbox"/> Not applicable _____ <input type="checkbox"/> Uses are: _____ (Submit safety analysis supporting safe use)

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Yes	No	Radioisotope	Manufacturer or Distributor Model No.	Quantity	Use As Listed on SSD Certificate	Specify Other Uses Not Listed on SSD Certificate
		Californium-252	Sealed source manufacturer or distributor and model number: _____ Device manufacturer or distributor and model number: _____	Not to exceed either the maximum activity per source or maximum activity per device as specified in Sealed Source and Device Registration Certificate	Yes <input type="checkbox"/> Specific description of the gauge use: _____ _____ _____ _____ _____	<input type="checkbox"/> Not applicable _____ <input type="checkbox"/> Uses are: _____ (Submit safety analysis supporting safe use)
		Other Isotope (Specify):	Sealed source manufacturer or distributor and model number: _____ Device manufacturer or distributor and model number: _____	Not to exceed either the maximum activity per source or maximum activity per device as specified in Sealed Source and Device Registration Certificate	Yes <input type="checkbox"/> Specific description of the gauge use: _____	<input type="checkbox"/> Not applicable _____ <input type="checkbox"/> Uses are: _____ (Submit safety analysis supporting safe use)
<i>Financial Assurance Required and Evidence of Financial Assurance Provided</i>						

**ITEMS 7 THROUGH 11: TRAINING AND EXPERIENCE, FACILITIES AND EQUIPMENT, RADIATION SAFETY PROGRAM, AND WASTE DISPOSAL**

Item No. And Title	Suggested Response	Yes	Alternative Procedures Attached
<p><b>7. INDIVIDUAL(S) RESPONSIBLE FOR RADIATION SAFETY PROGRAM AND THEIR TRAINING AND EXPERIENCE – RADIATION SAFETY OFFICER</b></p> <p>Name: _____</p>	<p>Before obtaining licensed materials, the proposed RSO will have successfully completed one of the training courses described in 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.</p>	<input type="checkbox"/>	<input type="checkbox"/>
<p><b>8. TRAINING FOR INDIVIDUALS WORKING IN OR FREQUENTING RESTRICTED AREAS</b></p>	<p>Before using licensed materials, authorized users will have successfully completed one of the training course described in Criteria in the section entitled “Training for Individuals Working In or Frequenting Restricted Areas” in NUREG-1556, Vol. 1, Rev 1, dated November 2001.</p>	<input type="checkbox"/>	<input type="checkbox"/>
<p><b>9. FACILITIES AND EQUIPMENT</b></p>	<p>No information needs to be submitted in response to this item; key issues are addressed under “Radiation Safety Program – Public Dose” and “Radiation Safety Program – Operating and Emergency Procedures.”</p>	<p><b>Separate Item 9 Response</b> <b>Need Not Be Submitted With Application</b></p>	
<p><b>10. RADIATION SAFETY PROGRAM – AUDIT PROGRAM</b></p>	<p>The applicant is <i>not</i> required to, and should not, submit its audit program to NRC for review during the licensing phase.</p>	<p><b>Need Not Be Submitted With Application</b></p>	
<p><b>10. RADIATION SAFETY PROGRAM – TERMINATION OF ACTIVITIES</b></p>	<p>The applicant is <i>not</i> required to submit a response to the termination of activities section during the initial application. However, when the license expires when the licensee ceases operation, NRC Form 314 must be submitted.</p>	<p><b>Need Not Be Submitted With Application</b></p>	
<p><b>10. RADIATION SAFETY PROGRAM – SURVEY INSTRUMENTS</b></p>	<p>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.</p>	<input type="checkbox"/>	<input type="checkbox"/>

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Item No. And Title	Suggested Response	Yes	Alternative Procedures Attached
10. RADIATION SAFETY PROGRAM – 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.	<input type="checkbox"/>	<input type="checkbox"/>
10. RADIATION SAFETY PROGRAM – OCCUPATIONAL DOSIMETRY	Either 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, or we will provide dosimetry processed and evaluated by an NVLAP-approved processor that is exchanged at a frequency recommended by the processor.	<input type="checkbox"/>	<input type="checkbox"/>
10. RADIATION SAFETY PROGRAM – PUBLIC DOSE	The applicant is <i>not</i> required to submit a response to the public dose section during the licensing phase. This matter will be examined during an inspection.	<b>Need Not Be Submitted With Application</b>	
10. RADIATION SAFETY PROGRAM – OPERATING AND EMERGENCY PROCEDURES	<p>We will implement and maintain the operating and emergency procedures in Appendix H of NUREG-1556, Vol. 1, Rev. 1, dated November 2001, and provide copies of these procedures to all gauge users and at each job site.</p> <p style="text-align: center;"><b>OR</b></p> <p>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.</p>	<input type="checkbox"/>          <input type="checkbox"/>	<input type="checkbox"/>
10. RADIATION SAFETY PROGRAM – LEAK TEST	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 for 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.	<input type="checkbox"/>	<input type="checkbox"/>          <b>The information in Appendix J supporting a request to perform leak testing and sample analysis is attached.</b>

Item No. And Title	Suggested Response	Yes	Alternative Procedures Attached
<p><b>10. RADIATION SAFETY PROGRAM – MAINTENANCE</b></p>	<p><i>Routine Cleaning and Lubrication</i>                      We will implement and maintain procedures for routine maintenance of our gauges according to each manufacturer's recommendations and instructions.</p> <p><i>Non-Routine Maintenance</i>                      We will 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 the removal of the source or source rod from the gauge.</p>	<p><input type="checkbox"/></p> <p><input type="checkbox"/></p>	<p><input type="checkbox"/></p> <p><input type="checkbox"/></p> <p><b>The information listed in Appendix G supporting a request to perform non-routine maintenance in-house is attached.</b></p>
<p><b>10. RADIATION SAFETY PROGRAM – TRANSPORTATION</b></p>	<p>The applicant is <i>not</i> required to submit its response to transportation during the licensing process. However, this issue will be reviewed during inspection.</p>		<p><b>Need Not Be Submitted With Application</b></p>
<p><b>11. WASTE MANAGEMENT – GAUGE DISPOSAL AND TRANSFER</b></p>	<p>The applicant is <i>not</i> required to submit a response to waste management during the licensing process. However, the licensee should develop, implement, and maintain gauge transfer and disposal procedures in its radiation protection program.</p>		<p><b>Need Not Be Submitted With Application</b></p>