From:	Lawyer, Dennis
To:	bbatting@itlndt.com
Subject:	Integrity Testlabs, Inc., Request for Additional Information Concerning Application for a License Amendment, Control 585191
Date:	Thursday, November 20, 2014 1:40:00 PM

Dear Mr. Batting,

This is in reference to your application dated October 27, 2014, and Radiation Detection Instrument Calibration Procedure dated November 6, 2014, requesting for amendment to Nuclear Regulatory Commission License No. 07-30791-01, Docket No. 03036177 In order to continue our review, we need the following additional information:

1. In section 1.2 of your submitted Radiation Detection Instrument Calibration Procedure, it states you will use trained and qualified individuals to perform calibrations. NUREG-1556, Volume 2, "Consolidated Guidance About Materials Licenses Program-Specific Guidance About Industrial Radiography Licenses," section 8.10.2, "Instruments", states for the applicant to identify the qualifications of the individuals who will perform calibration. Please state the training and qualifications requirements of the individuals who will perform the calibrations.

2. Appendix J of NUREG-1556, Volume 2, gives the model procedure for performing instrument calibrations. You elected to provide a specific procedure for approval. Appendix J states that a source should have its exposure rate at a given distance traceable by documented measurements to a standard certified to be within +/- 5% accuracy by National Institute of Standards and Technology (NIST). The application did not provide certification or state that certification would be obtained to be within +/- 5% accuracy by NIST for your calibration source. Please state that the source will have its exposure rate at a given distance traceable by documented measurements to a standard certified to be within +/- 5% accuracy by NIST.

3. The second calculation associated with source activity in section 5.6 I of your submitted calibration procedure appear to be inaccurate. The "Y" constant would appear to be the activity of the source when certified and not the date it was made. Please state you have corrected this calculation or provide information why it is accurate by example.

4. Step 9 of section 5.6 of the calibration procedure appears confusing. The step requires you to calculate the distance for 80 mR/hr intensity but requires the use of an attenuator. Your calculations did not include the use of the attenuators for calculating the distance. This is similar to Step 11 where you are to calculate the distance of 8 mR/hr and place in an attenuator. By procedure, you would have two 0.1 attenuators in place but this might be unclear to the user of the procedure. Please provide in the calculation the methods for determining distance with attenuators in place or alternate methods to make the procedure clearer.

5. Section 5.7 of the calibration procedure appears to be missing some steps. A calculation is made to determine distances, but it only appears to check the rate alarm meters at 500 mR/hr value. Also it is not clear in this section if the other values are checked and what is the acceptance criteria.. Please rewrite this section to clarify if all dose rate levels are to be checked and clearly state the acceptance

criteria for each dose rate value.

For question 2 through 6, you may state that the model procedures in Appendix J will be followed instead of submitting a procedure.

We will continue our review upon receipt of this information. Please reply to my attention at the Region 1 Office (Address below) and refer to Mail Control No. 585191. If you have technical questions regarding this letter, please call me at (610) 337-5366.

Please note that you may not reply to this letter by return e-mail. Your reply must be in writing by letter or facsimile (610-337-5269). If we do not receive a reply from you within 30 calendar days from the date of this e-mail, we will assume that you do not wish to pursue your application.

Region 1 Office Mailing Address: Licensing Assistance Team, US Nuclear Regulatory Commission Region I, 2100 Renaissance Boulevard, Suite 100, King of Prussia, PA 19406-2713.

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