



CONVERSATION RECORD

10/17/2014

NAME OF PERSON(S) CONTACTED OR IN CONTACT WITH YOU

Christopher G. Holth, Radiation Safety Officer

DATE OF CONTACT

10/17/2014

TYPE OF CONVERSATION

☐ E-MAIL☒ TELEPHONE☐ INCOMING☒ OUTGOING

E-MAIL ADDRESS

cholth@structurepoint.com

TELEPHONE NUMBER

(317) 547-5580

ORGANIZATION

American Consulting, Inc.

DOCKET NUMBER(S)

030-36584

LICENSE NUMBER(S)

13-32518-01

CONTROL NUMBER(S)

584288

SUBJECT

Our review of your license renewal application dated July 9, 2014

SUMMARY

We have reviewed your license renewal application and find that we are unable to continue this action until we have received additional information noted below. Refer to NUREG 1556, Vol. 1, found at <http://www.nrc.gov/reading-rm/doc-collections/nuregs/staff/sr1556/v1/r1>, when providing additional detail regarding responses surrounding your Radiation Safety Program. You may provide your response on typed 8.5" x 11" sheets, or by completing the applicable portions of the Appendix B checklist. For your convenience, copies of the relevant pages from the checklist are attached. Include a signed and dated cover letter with your response.

Direct any questions you have to me at (630) 829-9892 or sara.forster@nrc.gov.

Submit requested information within 30 days of this record, referencing Control No. 584288, as listed at the top of this memo. Please FAX your response to my attention at (630) 515-1078. You may also scan your response and send to me via email, as a pdf file.

As discussed, we expect to receive your written response on or before November 16, 2014.

ACTION REQUIRED (IF ANY)

1. Please provide an overall possession limit for gauges to be used and possessed under the license. For Troxler and Humboldt device models to be removed from the license, please provide source removal information (confirmation of receipt by party to whom device was transferred & most recent leak tests) or otherwise confirm any models never possessed or used under the license.
2. The Radiation Safety Program, as submitted, appears to be a user manual for gauge users. Please reconsider the submission of program details, as a license amendment would be required to modify those procedures. In the alternative, please submit program information limited to survey instruments, material receipt and accountability, occupational dosimetry, operating and emergency procedures, leak tests, and routine & non-routine maintenance, as described in suggested responses outlined on the attached guidance pages B-4 to B-5. For any alternative procedures, please explain and/or justify, as applicable.

NAME OF PERSON DOCUMENTING CONVERSATION

Sara A.B. Forster, Materials Licensing Branch, Region III Office, 2443 Warrenville Road, Suite 210, Lisle, Illinois 60532

SIGNATURE

10/17/2014

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
7. INDIVIDUAL(S) RESPONSIBLE FOR RADIATION SAFETY PROGRAM AND THEIR TRAINING AND EXPERIENCE - RADIATION SAFETY OFFICER Name: _____	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.	<input type="checkbox"/>	<input type="checkbox"/>
8. TRAINING FOR INDIVIDUALS WORKING IN OR FREQUENTING RESTRICTED AREAS	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.	<input type="checkbox"/>	<input type="checkbox"/>
9. FACILITIES AND EQUIPMENT	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."	Separate Item 9 Response Need Not Be Submitted With Application	
10. RADIATION SAFETY PROGRAM - AUDIT PROGRAM	The applicant is <i>not</i> required to, and should not, submit its audit program to NRC for review during the licensing phase.	Need Not Be Submitted With Application	
10. RADIATION SAFETY PROGRAM - TERMINATION OF ACTIVITIES	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.	Need Not Be Submitted With Application	
→ 10. RADIATION SAFETY PROGRAM - 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.	<input type="checkbox"/>	<input type="checkbox"/>

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 Re dosimetry: Please either affirm statement at right, or amend 7/9/14 application with dosimetry exchange frequency (monthly, quarterly, etc.) and confirm processing by NVLAP.	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.	Need Not Be Submitted With Application	
→ 10. RADIATION SAFETY PROGRAM – OPERATING AND EMERGENCY PROCEDURES	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. OR 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.	<input type="checkbox"/> <input type="checkbox"/>	<input type="checkbox"/>
→ 10. RADIATION SAFETY PROGRAM – LEAK TEST If the leak test, not just sample collection, will be performed by the RSO, a procedure is needed.	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"/> The information in Appendix J supporting a request to perform leak testing and sample analysis is attached.

Item No. And Title	Suggested Response	Yes	Alternative Procedures Attached
→ 10. RADIATION SAFETY PROGRAM - MAINTENANCE	<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.	<input type="checkbox"/>	<input type="checkbox"/>
	<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. If the non-routine maintenance is performed, a procedure is needed. An explanation as to the need also is needed.	<input type="checkbox"/>	<input type="checkbox"/> The information listed in Appendix G supporting a request to perform non-routine maintenance in-house is attached.
10. RADIATION SAFETY PROGRAM - TRANSPORTATION	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.	Need Not Be Submitted With Application	
11. WASTE MANAGEMENT - GAUGE DISPOSAL AND TRANSFER	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.	Need Not Be Submitted With Application	

Forster, Sara

From: Forster, Sara
Sent: Friday, October 17, 2014 11:01 AM
To: 'cholth@structurepoint.com'
Subject: Additional Information Request for American Consulting, Inc., NRC Lic. No. 13-32518-01
Attachments: 03121.584288.13-32518-01 telecon signed.pdf

Dear Mr. Holth:

Please see the attached file for additional information needed to complete the review of the recent renewal application for NRC Lic. No. 13-32518-01. Note that the attached conversation record requests additional information on or before close of business on November 16, 2014. Additional guidance may be found in, NUREG 1556, Vol. 1, rev. 1, "Program-Specific Guidance About Portable Gauge Licenses," which may be found at:

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

Submission of your response as a pdf file attached to an email or via facsimile will allow for the quickest processing. Do not hesitate to call me with any questions you may have.

Sara A. B. Forster, Health Physicist Licensing Reviewer
U.S. Nuclear Regulatory Commission - Region III
Division of Nuclear Materials Safety
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