



**PRINCIPALS**

George E. Hubbell  
Thomas E. Biehl  
Walter H. Alix  
Keith D. McCormack  
Nancy M. D. Faught  
Daniel W. Mitchell  
Jesse B. VanDeCreek  
Roland N. Alix

**SENIOR ASSOCIATES**

Gary J. Tressel  
Kenneth A. Melchior  
Randal L. Ford  
William R. Davis  
Dennis J. Benoit  
Robert F. DeFrain  
Thomas D. LaCross  
Albert P. Mickalich

**ASSOCIATES**

Jonathan E. Booth  
Michael C. MacDonald  
Marvin A. Olane  
Marshall J. Grazioli  
James F. Burton  
Donna M. Martin  
Charles E. Hart  
Colleen L. Hill-Stramsak  
Bradley W. Shepler  
Karyn M. Stickle

**HUBBELL, ROTH & CLARK, INC.**

OFFICE: 555 Hulet Drive  
Bloomfield Hills, MI 48302-0360  
MAILING: PO Box 824  
Bloomfield Hills, MI 48303-0824  
PHONE: 248.454.6300  
FAX: 248.454.6312  
WEBSITE: www.hrc-engr.com  
EMAIL: info@hrc-engr.com

May 11, 2015

Ms. Sara Forster  
United States Nuclear Regulatory Commission  
Division of Nuclear Materials Safety  
2443 Warrenville Road, Suite 210  
Lyle, Illinois 60532-4352

Re: Responses for Additional Information / Clarification  
Renewal of NRC Materials License Number 21-26646-01

Dear Ms. Forster:

In response to the two items indicated in your e-mail to me of 5-7-14:

1. We would like to keep the overall possession limits for cesium-137 to be 120 millicuries and for americium-241 to be 600 millicuries.
2. We do not wish to revise the Authorized Use from Troxler 3400 Series to Troxler Model 3430 gauging devices as implied. We would like to keep the Authorized Use as Troxler 3400 Series gauging devices as is indicated in Item 9 of our current license. I have revised Attachment 3 to reflect this and enclosed the revised version with this letter.

We trust this provides adequate clarification for these two items.

If you have any questions or require any additional information, please contact the undersigned at 248-535-3450.

Very truly yours,

HUBBELL, ROTH & CLARK, INC.

Marshall J. Grazioli, P.E.  
Associate / Radiation Safety Officer

MJG/mg

Enclosures: ATTACHMENT # 3 (Revised 5-11-15)

**ATTACHMENT # 3 (Revised 5-11-15)**

**ITEM 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: AEA Technology X1218  Device manufacturer or Distributor and model number: Troxler Electronics Laboratories 3400 Series Gauges	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: To measure physical properties of materials.	<input type="checkbox"/> Not applicable  <input type="checkbox"/> Uses are:
		Americium-241	Sealed source manufacturer Or distributor and model number: AEA Technology X1 and X1/2  Device manufacturer or Distributor and model number: Troxler Electronics Laboratories 3400 Series Gauges	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: To measure physical properties of materials.	<input type="checkbox"/> Not applicable  <input type="checkbox"/> Uses are:

## Forster, Sara

---

**From:** Grazioli Marshall <MGrazioli@hrc-engr.com>  
**Sent:** Monday, May 11, 2015 1:08 PM  
**To:** Forster, Sara  
**Subject:** RE: Additional Information Request for Hubbell, Roth & Clark, Inc., Lic. No. 21-26646-01, C/N 586462  
**Attachments:** Letter2+Revised Attachement #3.pdf

Good Afternoon Sara,

I did also receive your phone message regarding the subject matter of the e-mail below. Attached is a letter and Revised Attachment #3 that should satisfy the requests contained therein.  
Please call me (cell) or e-mail me with any further questions or clarification needed.

Thank You,

Marshall Grazioli

Marshall J. Grazioli, P.E.  
Associate – Construction Testing  
**Hubbell, Roth & Clark, Inc.**  
555 Hulet Drive  
Bloomfield Hills, MI 48302-0360  
Phone: (248) 454-6300  
Direct: (248) 454-6306  
Cell: (248) 535-3450  
Fax: (248) 454-6359  
E-mail: [mgrazioli@hrc-engr.com](mailto:mgrazioli@hrc-engr.com)



**From:** Forster, Sara [<mailto:Sara.Forster@nrc.gov>]  
**Sent:** Thursday, May 07, 2015 8:38 AM  
**To:** Grazioli Marshall  
**Subject:** Additional Information Request for Hubbell, Roth & Clark, Inc., Lic. No. 21-26646-01, C/N 586462

Dear Mr. Grazioli:

We have reviewed your April 1, 2015, application to renew the above referenced license. We noted that your application omitted maximum overall cesium-137 and americium-241 possession limits, and requested authorized use of only the Troxler Model 3430 gauge. The most recent amendment to your license authorizes the use of Troxler Model 3400 Series gauges, with overall possession limits of 120 millicuries cesium-137 and 600 millicuries americium-241. Additional information is needed to complete our review:

1. Please provide overall maximum cesium-137 and americium-241 possession limits, to include all portable nuclear gauges to be possessed under the license.
2. Please confirm that you wish to revise the Authorized Use (Item 9 listed on the license) from Troxler Model 3400 Series to Troxler Model 3430 gauging devices.