

Junod, Rebecca

From: Chad.Lincoln@trumbullcorp.com
Sent: Wednesday, April 29, 2015 5:22 PM
To: Lodhi, Sattar
Subject: Re: NRC License Renewal
Attachments: Gauge_38309_3072(1).pdf; Gauge_38309_3072(2).pdf; NUREG Form Rev2.pdf

Q-2

Sattar,

Attached is the Rev 2 form per your request. In addition, we do not want the Mount Storm location indicated on the license. Storage at that location was discontinued on 1/19/15. The gauges were then moved to our storage location in West Mifflin, PA. The leak tests conducted for each gauge prior to the leaving the location and the most recent leak test are provided. Please advise if you need anything additional.

Thanks

37-19062-01
03016010



Chad
Lincoln
Area Safety
Manager

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Email chad.lincoln@trumbullcorp.com

Trumbull
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225 North Shore Drive
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From: "Lodhi, Sattar" <Sattar.Lodhi@nrc.gov>
To: "Chad.Lincoln@trumbullcorp.com" <Chad.Lincoln@trumbullcorp.com>
Date: 04/28/2015 02:16 PM
Subject: NRC License Renewal

Chad:

I tried to contact you over phone, but was not successful in contacting you. I have reviewed your application and I need the following additional information:

1. Please use Appendix B from NUREG 1556, Vol 1, **Rev 2**.
2. Your current license authorizes storage and use location at Power Station Highway in Mount Storm, WV, but your renewal application does not indicate (in NRC Form 313 item 3) this address. If you do not want that location to be listed on the license, we need confirmation that there is no residual contamination left at the location. One way to do this is to review your leak test records of the gauges that were stored at that location. If you find that none of the gauges that were stored there ever leaked while they were stored at that location.

We will continue our review after we have received the information. Please feel free to call me if you have any questions.

Sattar Lodhi
(610) 337 5364

Applied Health Physics, LLC

2986 Industrial Blvd., Bethel Park, Pa 15102 Phone: (412) 835-9555 Fax: (412) 835-9559
E-Mail address: kmobley.ahp@comcast.net - Web Page address: WWW.APPLIEDHEALTHPHYSICS.COM

Mark V Leak Test Certificate

This certificate shall not be reproduced except in full, without the written approval of Applied Health Physics.

Device Information

Device Serial Number:	38309	Source Serial Number:	47-8386/ 77-5640
Device Manufacturer:	Troxler	Source Manufacturer:	
Device Model:	3430	Source Model:	
Device Type: Gauge	Make: Moisture Density Gauge	Location:	West Mifflin, PA
Radioisotope: Cs-137 / Am-241Be	Activity: 8 mCi / 40 mCi		

Leak Test Information

Leak Test Performed by:	Chad Lincoln	Leak Test Performed on:	4/21/2015
Leak Test Specimen Number:	A-040364	Leak Test Analysis Date:	4/22/2015
Leak Test Analysis Performed by:	L. McAllister		
Leak Test Results Indicate an Activity of:	< 0.005 uCi		

Notification

The analysis of this leak test sample was provided by Applied Health Physics, Pennsylvania Department of Environmental Protection License Number PA-0228A. In the event this specimen indicates leakage and or contamination in excess of 0.005 microcuries, Applied Health Physics will notify you promptly by telephone; at such time you will need to take the appropriate actions required by the governing regulatory agency. Applied Health Physics utilized the following for leak test analysis: Sample model: MARK V Leak Test Kit for wet swab analysis. Leak test analysis instrument: Manufacturer - Protean Instruments Model ASC950 serial number 01216140.

Client Information

Trumbull Corporation- PGH	Contact:	Chad Lincoln
225 North Shore Drive	Phone:	(412) 287-9067
	Contact:	chad.lincoln@trumbullcorp.com
	Phone:	
Pittsburgh	PA	15212

This certificate is an essential record and should be maintained for inspection by the regulatory agency.

Next LT Due 10/21/2015

Applied Health Physics, LLC

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Device Information

Device Serial Number:	3072	Source Serial Number:	NJ-03278/8156-GQ		
Device Manufacturer:	Humboldt	Source Manufacturer:			
Device Model:	5001EZ	Source Model:			
Device Type:	Gauge	Make:	Moisture / Density Gauge	Location:	West Mifflin
Radioisotope:	Cs-137 / Am-241Be	Activity:	10 mCi / 40 mCi		

Leak Test Information

Leak Test Performed by:	Chad Lincoln	Leak Test Performed on:	4/21/2015
Leak Test Specimen Number:	A-040327	Leak Test Analysis Date:	4/22/2015
Leak Test Analysis Performed by:	L. McAllister		
Leak Test Results Indicate an Activity of:	< 0.005 μ Ci		

Notification

The analysis of this leak test sample was provided by Applied Health Physics. Pennsylvania Department of Environmental Protection License Number PA-0228A. In the event this specimen indicates leakage and or contamination in excess of 0.005 microcuries, Applied Health Physics will notify you promptly by telephone; at such time you will need to take the appropriate actions required by the governing regulatory agency. Applied Health Physics utilized the following for leak test analysis: Sample model: MARK V Leak Test Kit for wet swab analysis. Leak test analysis instrument: Manufacturer - Protean Instruments Model ASC950 serial number 01216140.

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E-Mail address: knobley.ahp@comcast.net - Web Page address: WWW.APPLIEDHEALTHPHYSICS.COM

Mark V Leak Test Certificate

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Device Information

Device Serial Number:	38309	Source Serial Number:	47-8386/77-5640		
Device Manufacturer:	Troxler	Source Manufacturer:			
Device Model:	3430	Source Model:			
Device Type:	Gauge	Make:	Moisture Density Gauge	Location:	
Radionuclide:	Cs-137 / Am-241Be	Activity:	8 mCi / 40 mCi		

Leak Test Information

Leak Test Performed by:	Jim Woods	Leak Test Performed on:	9/15/2014
Leak Test Specimen Number:	A-036919	Leak Test Analysis Date:	11/10/2014
Leak Test Analysis Performed by:	L. McAllister		
Leak Test Results Indicate an Activity of:	< 0.005 uCi		

Notification

The analysis of this leak test sample was provided by Applied Health Physics, Pennsylvania Department of Environmental Protection License Number PA-0228A. In the event this specimen indicates leakage and or contamination in excess of 0.005 microcuries, Applied Health Physics will notify you promptly by telephone; at such time you will need to take the appropriate actions required by the governing regulatory agency. Applied Health Physics utilized the following for leak test analysis: Sample model: MARK V Leak Test Kit for wet swab analysis. Leak test analysis instrument: Manufacturer - Protean Instruments Model ASC950 serial number 01216140.

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Mark V Leak Test Certificate

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Device Information

Device Serial Number:	3072	Source Serial Number:	NJ-03278/8156-GQ		
Device Manufacturer:	Humboldt	Source Manufacturer:			
Device Model:	5001EZ	Source Model:			
Device Type:	Gauge	Make:	Moisture / Density Gauge	Location:	Mount Storm, WV.
Radioisotope:	Cs-137 / Am-241Be	Activity:	10 mCi / 40 mCi		

Leak Test Information

Leak Test Performed by:	Jim Woods	Leak Test Performed on:	9/15/2014
Leak Test Specimen Number:	A-036924	Leak Test Analysis Date:	11/10/2014
Leak Test Analysis Performed by:	L. McAllister		
Leak Test Results Indicate an Activity of:	< 0.005 uCi		

Notification

The analysis of this leak test sample was provided by Applied Health Physics. Pennsylvania Department of Environmental Protection License Number PA-0228A. In the event this specimen indicates leakage and or contamination in excess of 0.005 microcuries, Applied Health Physics will notify you promptly by telephone; at such time you will need to take the appropriate actions required by the governing regulatory agency. Applied Health Physics utilized the following for leak test analysis: Sample model: MARK V Leak Test Kit for wet swab analysis. Leak test analysis instrument: Manufacturer - Protean Instruments Model ASC950 serial number 01216140.

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Next LT Due 3/15/2015

APPENDIX B

**SUGGESTED FORMAT FOR PROVIDING INFORMATION REQUESTED
IN ITEMS 5 THROUGH 11 OF
U.S. NUCLEAR REGULATORY COMMISSION FORM 313**

Items 5 and 6: Materials To Be Possessed and Proposed Uses

Yes	No	Radionuclide	Manufacturer or Distributor Model No.	Quantity	Use as Listed on SSD Registration Certificate	Specify Other Uses Not Listed on SSD Registration Certificate
X		Cesium-137	Gauge manufacturer or distributor and model number of the gauge: Troxler DWG 3000 Humboldt Scientific 220001 Device: Troxler 300 Series Humboldt 5001	Specify activity per source and number of gauges requested. 9 mCi not to exceed 45 mCi ↓ 11 mCi not to exceed 11 mCi	Yes <input checked="" type="checkbox"/> Specific description of the gauge use: MEASURING PHYSICAL PROPERTIES	<input type="checkbox"/> Not applicable <input type="checkbox"/> Uses are: (Submit safety analysis supporting safe use)
X		Americium-241	Gauge manufacturer or distributor and model number of the gauge: Troxler DWG 3000 or C-100 500 Humboldt 220001 Device: Troxler 3400 Humboldt 5001	Specify activity per source and number of gauges requested. 44 mCi not to exceed 220 mCi ↓ 44 mCi not to exceed 44 mCi	Yes <input checked="" type="checkbox"/> Specific description of the gauge use: MEASURING PHYSICAL PROPERTIES	<input type="checkbox"/> Not applicable <input type="checkbox"/> Uses are: (Submit safety analysis supporting safe use.)

Yes	No	Radionuclide	Manufacturer or Distributor Model No.	Quantity	Use as Listed on SSD Registration Certificate	Specify Other Uses Not Listed on SSD Registration Certificate
	X	Californium-252	Gauge manufacturer or distributor and model number of the gauge: _____	Specify activity per source and number of gauges requested. _____ _____ _____	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.)
	X	Radium-226	Gauge manufacturer or distributor and model number of the gauge and number of gauges of each model that is being requested: _____	Specify activity per source and number of gauges requested. _____ _____	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.)
	X	Other Isotope (Specify):	Gauge manufacturer or distributor and model number of the gauge: _____	Specify activity per source and number of gauges requested. _____ _____	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.)
	X	Is financial assurance required? If yes, submit evidence of financial assurance				

**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>7. INDIVIDUAL(S) RESPONSIBLE FOR RADIATION SAFETY PROGRAM AND THEIR TRAINING AND EXPERIENCE—RADIATION SAFETY OFFICER</p> <p>Name: <u>Chad Lincoln</u></p>	<p>Provide documentation of the training of the proposed RSO.</p> <p><i>Attached</i></p>	<p>Submit applicable documentation.</p>	
<p>8. TRAINING FOR INDIVIDUALS WORKING IN OR FREQUENTING RESTRICTED AREAS</p>	<p>Before using licensed materials, authorized users will have successfully completed one of the training courses described in the "Criteria" part of the section titled "Training for Individuals Working in or Frequenting Restricted Areas" in NUREG-1556, Vol. 1, Rev. 2.</p>	<p align="center"><input checked="" type="checkbox"/></p>	<p align="center"><input type="checkbox"/></p>
<p>9. FACILITIES AND EQUIPMENT</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, Emergency, and Security Procedures" below.</p>	<p align="center">Need Not Be Submitted with Application</p>	
<p>10.1 RADIATION SAFETY PROGRAM—AUDIT PROGRAM</p>	<p>The applicant is <i>not</i> required to, and should not, submit its audit program to the NRC for review during the licensing phase. The audit program will be reviewed during NRC inspections.</p>	<p align="center">Need Not Be Submitted with Application</p>	
<p>10.2 RADIATION SAFETY PROGRAM—SURVEY INSTRUMENTS</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 titled "Radiation Safety Program—Instruments" in NUREG-1556, Vol. 1, Rev. 2, "Consolidated Guidance about Materials Licenses: Program-Specific Guidance about Portable Gauge Licenses," in the event of an incident.</p>	<p align="center"><input checked="" type="checkbox"/></p>	<p align="center"><input type="checkbox"/></p>

Item No. and Title	Suggested Response	Yes	Alternative Procedures Attached
10.3 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 checked="" type="checkbox"/>	<input type="checkbox"/>
10.4 RADIATION SAFETY PROGRAM—OCCUPATIONAL DOSIMETRY	<p>We will maintain, for inspection by the NRC, documentation demonstrating that unmonitored individuals are not likely to receive, in one year, a radiation dose in excess of 10 percent of the allowable limits in 10 CFR Part 20.</p> <p style="text-align: center;">OR</p> <p>We will provide dosimetry processed and evaluated by an NVLAP-approved processor that is exchanged at a frequency recommended by the processor.</p>	<input checked="" type="checkbox"/> <input type="checkbox"/>	<input type="checkbox"/>
10.5 RADIATION SAFETY PROGRAM—PUBLIC DOSE	The applicant is <i>not</i> required to submit a response to the public dose section in a license application. This matter will be examined during an inspection.	Need Not Be Submitted with Application	
10.6 RADIATION SAFETY PROGRAM—OPERATING, EMERGENCY, AND SECURITY PROCEDURES	<p>We will implement and maintain the operating and emergency procedures in Appendix G to NUREG-1556, Vol. 1, Rev. 2, "Consolidated Guidance about Materials Licenses: Program-Specific Guidance about Portable Gauge Licenses," and will develop, implement and maintain security procedures using information in Appendix G. Copies of these procedures will be provided to all gauge users and at each job site.</p> <p style="text-align: center;">OR</p> <p>Operating, emergency, and security procedures will be developed, implemented, and maintained and consistent with the criteria in the section titled "Radiation Safety Program—Operating, Emergency, and Security Procedures" in NUREG-1556, Vol. 1, Rev. 2, "Consolidated Guidance about Materials Licenses: Program-Specific Guidance about Portable Gauge Licenses."</p>	<input type="checkbox"/> <input checked="" type="checkbox"/>	<input type="checkbox"/>

Item No. and Title	Suggested Response	Yes	Alternative Procedures Attached
10.7 RADIATION SAFETY PROGRAM—LEAK TEST	Leak tests will be performed at intervals approved by the NRC or an Agreement State and specified in the SSD registration certificate. Leak tests will be performed by an organization licensed by the NRC or an Agreement State to provide leak testing services to other licensees or using a leak test kit supplied by an organization licensed by the NRC or an Agreement State to provide leak test kits to other licensees and according to the kit supplier's instructions.	<input checked="checked" type="checkbox"/>	<input type="checkbox"/> The information in Appendix I supporting a request to perform the collection of leak test samples and sample analysis is attached.
10.8 RADIATION SAFETY PROGRAM—MAINTENANCE	<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>Nonroutine Maintenance</i> We will send the gauge to the manufacturer or other person authorized by the NRC or an Agreement State to perform nonroutine maintenance or repair operations that require detaching the source or source rod from the gauge.</p>	<input checked="checked" type="checkbox"/> <input checked="checked" type="checkbox"/>	<input type="checkbox"/> <input type="checkbox"/> The information listed in Appendix F supporting a request to perform nonroutine maintenance in house is attached.
10.9 RADIATION SAFETY PROGRAM—TRANSPORTATION	The applicant is <i>not</i> required to submit its response about transportation during the licensing process. 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 about waste management during the licensing process. However, the licensee should establish and include waste disposal procedures in its radiation safety program.	Need Not Be Submitted with Application	