

Markus Hannig

From: Markus Hannig <markus.hannig@betacontrolinc.com>
Sent: Thursday, June 25, 2015 10:02 AM
To: 'Miller, John'
Subject: RE: License renewal application - Mail Control No. 586850
Attachments: Emergency Procedurs.pdf; DOT Certificate 2012.pdf; DOT Certificate 2009 Awareness.pdf; DOT Certificate 2009.pdf; DOT Certificate 2012 Awareness.pdf; DOT Certificate 2012 Radiation Fundamentals.pdf

Dear Mr. Miller,

Please see my replay in blue in your email below.

The one thing missing is the latest DOT certificate.

I completed the class June 23 and will send you a copy as soon as it is available, but this can take a while because I will be on vacation next week.

That's why I am send you what I have right now, so I will not pass any due dates.

I am available today and tomorrow, if you should have any immediate question.

Kindest Regards,



Markus Hannig

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From: Miller, John [mailto:John.Miller@nrc.gov]
Sent: Wednesday, June 17, 2015 10:36 AM
To: markus.hannig@betacontrolinc.com
Subject: License renewal application - Mail Control No. 586850

betacontrol of America, Inc.
License No. 29-23394-01
Docket No. 030-21015
Control No. 586850

Mr. Hannig

1. Item 3. of your application to renew your radioactive material license is blank. Please provide the address where radioactive material will be used or possessed. Your current license states "licensed material may be used at temporary job sites of the licensee anywhere in the United States where the U.S. Nuclear Regulatory Commission maintains jurisdiction for regulating the use of licensed material, including areas of exclusive Federal jurisdiction within Agreement States".
What our current license states will remain unchanged, "licensed material may be used at temporary job sites of the licensee anywhere in the United States where the U.S. Nuclear Regulatory Commission maintains jurisdiction

for regulating the use of licensed material, including areas of exclusive Federal jurisdiction within Agreement States”.

2. In Item 5. of your renewal application, you have provided a table of the radioactive sealed sources and devices that you wish to have authorized on your license. Unfortunately I was not able to locate a registry of radioactive sealed source and devices safety evaluation that confirmed that the sealed source made by Eckert and Ziegler, Model Am1.G22 can be mated with gauge Model MK1.0. Please submit additional information to support your request. You may want to contact the manufacturer for assistance. In addition the total activity column is blank for the last two sources.
This change has to be postponed until the device certificate NR-0122-D-101-B for MK 1.0 was updated.
3. Item 6. of your application describes how the radioactive sealed sources will be used by the end users, namely the general licensees. Please provide a description of how you plan on using the sources. Condition 9. of your current license may be useful in providing this information.
 - (1) Distribution of gauging devices specified in Condition 10 manufactured by BST ProControl GmbH (former betacontrol GmbH), Germany to persons authorized to receive the licensed material pursuant to terms and conditions of specific licenses issued by the U.S. Nuclear Regulatory Commission or any Agreement State;
 - (2) Installation, relocation, servicing, and repairing of the devices
 - (3) Performance of radiation surveys of the devices after installation at customers' facilities;
 - (4) Instruction and training of individuals in use of gauging devices;
 - (5) Removal and shipping of gauges from customers' facilities for repair by BST ProControl GmbH (former betacontrol GmbH);
 - (6) Demonstration of gauging devices; and
 - (7) Exchanging materials in 6.B through 6.O. at the licensee's facility
4. The training certificate that you provided as a credential for yourself^{2w} as the RSO was dated 2006. DOT refresher training is required for Hazmat employees every three years. Please submit updated training credentials for yourself or indicate how you plan to comply with this regulatory requirement.
I just (June 23) completed the DOT training and will provide the certificate as soon as it is available. In the meantime see attached the latest certificates.
5. Please submit the names of your authorized users as well as their training and experience. NUREG-1556, Vol.18, Section 8.7.2 recommends that authorized users will receive the training described in Appendix H or you may submit equivalent training.
Authorized user is Markus Hannig. Maintenance work on the licensed device was part of my internship with BST ProControl GmbH (former betacontrol GmbH) in addition to that I completed in Germany a radiation safety course equivalent to the RSO + DOT training in the USA.
6. NUREG-1556, Vol.18, Section 8.10.4 recommends that NVLAP – accredited dosimetry will be processed by a NVLAP – accredited entity. Please confirm that the dosimetry that you described in your application is NVLAP accredited.
Yes, our accredited dosimetry is processed by a NVLAP.
7. NUREG-1556, Vol.18, Section 8.10.6 recommends that you submit operating and emergency procedures. Please submit your procedures. Section 8.10.6 will provide you guidance for subjects to be addressed in your procedures.
Please find attached the emergency procedures
8. In your renewal application, you indicated that Kr-85 sources are recycled in the USA by authorized companies. Please confirm that Kr-85 sources will be sent to a licensed facility for disposal.
Yes, we are sending kr-85 source to a licensed facility for disposal.

In order to continue the review of your renewal application for your NRC license to use radioactive materials, we need additional information. If you have any questions, please contact me (610-337-5089).

Please respond in writing with a signed letter. You may submit the signed response document by hard copy, or as a pdf copy attached to an email, or by facsimile to 610-337-5269. Please be sure to include the Control No. 586850 on your response. We would appreciate a response within 30 days in order to expedite review of the license renewal application.

Thank you for your cooperation.

John J. Miller
Health Physicist
Division of Nuclear Materials Safety

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