

## Wilson, Scott

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**From:** Wilson, Scott  
**Sent:** Tuesday, September 08, 2015 11:18 AM  
**To:** 'emorrison@hkgroup.com'  
**Subject:** REQUEST FOR ADDITIONAL INFORMATION CONCERNING APPLICATION FOR RENEWAL TO LICENSE, CONTROL NO. 588572

License No. 37-20809-01  
Docket No. 03022110  
Control No. 588572

Edward M. Morrison  
Radiation Safety Officer  
Haines & Kibblehouse, Inc.  
P.O. Box 196  
Skippack, PA 19474

**SUBJECT: HAINES & KIBBLEHOUSE, INC., REQUEST FOR ADDITIONAL INFORMATION CONCERNING APPLICATION FOR RENEWAL TO LICENSE, CONTROL NO. 588572**

Dear Mr. Morrison:

This is in reference to your application dated July 28, 2015, requesting renewal of your Nuclear Regulatory Commission License No. 37-20809-01. We noted that you referenced the NRC's NUREG-1556, Volume 1, Revision 2 "Consolidated Guidance About Materials Licenses; Program-Specific Guidance About Portable Gauge Licenses" (NUREG-1556) in your application. A convenient method of providing the information required to process your renewal application is to complete Appendix B of NUREG-1556. In order to continue our review, we need the following additional information:

1. NUREG-1556, Section 8.2, Item No. 2 "Applicant's Name and Mailing Address" requires the applicant to provide the legal name of the applicant's corporation or other legal entity with direct control over use of the radioactive material. Item No. 2 of the application you submitted shows the company name and mailing address as H&K Group, Inc.; however, our records and the subject license have the name Haines & Kibblehouse, Inc. as the company name. Please confirm the legal name of the corporation.
2. Pursuant to 10 CFR 30.32(c), each application shall be signed by the applicant or licensee or a person duly authorized to act for and on the behalf of the applicant or licensee. NRC Form 313, "Application for Materials License," Item No. 13 requires the certifying officer to print and sign his or her name on the application. The application you submitted was signed by yourself as the radiation safety officer. Please provide assurances that you are duly authorized to act for and on the behalf of the licensee, **OR** submit another application signed by an officer of the corporation.
3. NUREG-1556, Section 8.5, Item No. 5 "Radioactive Material" requires that the applicant provide the manufacturer's name, model number, radionuclide, quantity, and nominal activity for each requested sealed source and the manufacturer and model number for each

device. We noted that your application did not state the manufacturer's name, model number(s), or quantity of devices. Please provide this information.

4. NUREG-1556, Section 8.10.4, "Occupational Dosimetry" requires the applicant to provide its program for occupational dosimetry. Your application did not provide a response to Section 8.10.4. Please provide any one of the following:
  - a. the following statement: "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," **OR**
  - b. the following statement: "We will provide dosimetry processed and evaluated by an NVLAP-approved processor that is exchanged at a frequency recommended by the processor," **OR**
  - c. a description of an alternative method for demonstrating compliance with the referenced regulations.

**Note:** Many licensees choose to provide personnel dosimetry to their workers for reasons other than compliance with NRC requirements (e.g., to respond to worker requests, or to maintain records of personal exposures).

5. NUREG-1556, Item 8.10.8 "Maintenance," requires the applicant to provide information regarding its procedure for performing both routine and non-routine maintenance on its gauges. We noted that you provided information regarding your procedure for routine maintenance; however, you did not include information about how you intend to handle any non-routine maintenance of the gauges. Submit either of the following:
  - a. the following statement: "We will send the gauge to the manufacturer or other person licensed by the NRC or an Agreement State to perform non-routine maintenance or repair operations that require detaching the source or source rod from the gauge," **OR**
  - b. a request to perform this work in house, using the information in NUREG-1556, Volume 1, Revision 2, Appendix F to support the request."

Current NRC regulations and guidance are included on the NRC's website at [www.nrc.gov](http://www.nrc.gov); select **Nuclear Materials; Med, Ind, & Academic Uses**; then **Licensee Toolkits, see our toolkit index page**. You may also obtain these documents by contacting the Government Printing Office (GPO) toll-free at 1-866-512-1800. The GPO is open from 8:00 a.m. to 5:30 p.m. EST, Monday through Friday (except Federal holidays).

We will continue our review upon receipt of this information. Please reply to my attention at the Region I Office and refer to Mail Control No. 588572. **You may respond via e-mail with a written, signed and scanned document in pdf format if you find it more convenient.** If you have any technical questions regarding this deficiency letter, please call me at (610) 337-5136.

If we do not receive a reply from you within 30 calendar days from the date of this letter, we will assume that you do not wish to pursue your application.

Scott Wilson

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