

McDowell & Associates

Geotechnical, Environmental & Hydrogeological Services • Materials Testing & Inspection

21355 Hatcher Avenue, Ferndale, MI 48220
Phone: (248) 399-2066 • Fax: (248) 399-2157

January 7, 2016

U.S. Nuclear Regulatory Commission
Region III
2443 Warrenville Road
Suite 210
Lisle, Illinois 60532-4352

Attention: Bill Reichhold

Dear Mr. Reichhold:

Per our phone conversation, I am providing you with additional information that was requested.

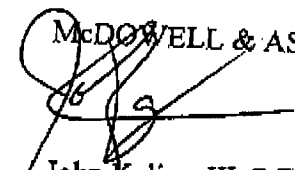
It should be understood that the undersigned is the president of McDowell & Associates and also the Radiation Safety Officer.

We hope this additional information is helpful for your records.

If you have any questions, please do not hesitate to call.

Very truly yours,

McDOWELL & ASSOCIATES



John Kalisz, III, P.E.
President

JK/jb

Mid-Michigan Office

3730 James Savage Road, Midland, MI 48642
Phone: (989) 496-3610 • Fax: (989) 496-3190

McDowell & Associates

21355 Hatcher Avenue
Ferndale, Michigan 48220

Phone: (248) 399-2066 • Fax: (248) 399-2157

FAX TRANSMITTAL SHEET

Please deliver this fax to: MR. Bill Reichhold
At: 630 829-9987
From: John Kalisz
Date: 1-7-16

We are sending 2 pages including this cover page.

Comments:

McDowell & Associates*Geotechnical, Environmental & Hydrogeological Services • Materials Testing & Inspection*

21355 Hatcher Avenue • Ferndale, MI 48220

Phone: (248) 399-2066 • Fax: (248) 399-2157

www.mcdowasc.com

November 16, 2015

Memo To: Radiation Safety Officer
From: Chief Executive Officer
Subject: Delegation of Authority

You, John Kalisz, III, have been appointed radiation safety officer and are responsible for ensuring the safe use of radiation. You are responsible for managing the Radiation Protection Program, identifying radiation protection problems, initiating, recommending, or providing corrective actions, verifying implementation of corrective actions, stopping unsafe activities, and ensuring compliance with regulations. You are hereby delegated the authority necessary to meet those responsibilities, including prohibiting the use of byproduct material by employees who do not meet the necessary requirements and shutting down operations, when justified, to maintain radiation safety. You are required to notify management if staff does not cooperate and does not address radiation safety issues. In addition, you are free to raise issues with the U.S. Nuclear Regulatory Commission at any time. It is estimated that you will spend four (4) hours per week conducting radiation protection activities.

Signature of Management Representative

Signature of Radiation Safety Officer

Date

Date

11-16-15

Mid-Michigan Office3730 James Savage Road • Midland, MI 48642
Phone: (989) 496-3610 • Fax: (989) 496-3190

RECEIVED NOV 17 2015

APPENDIX B

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 Certificate	Specify Other Uses Not Listed on SSD Certificate
X		Cesium-137	Sealed source manufacturer or distributor and model number: Troxler <hr/> Device manufacturer or distributor and model number: Troxler 3411 & 3400 Series	Not to exceed either the maximum activity per source or maximum activity per device as specified in Sealed Source and Device Registration Certificate 30 sources not to exceed 9millicuries each	Yes <input checked="" type="checkbox"/> Specific description of the gauge use: Measuring physical properties of materials	<input checked="" type="checkbox"/> Not applicable <input type="checkbox"/> Uses are: (Submit safety analysis supporting safe use)
X		Americium-241	Sealed source manufacturer or distributor and model number: Troxler <hr/> Device manufacturer or distributor and model number: Troxler 3411 & 3400 Series	Not to exceed either the maximum activity per source or maximum activity per device as specified in Sealed Source and Device Registration Certificate 30 sources not to exceed 44 millicuries each	Yes <input checked="" type="checkbox"/> Specific description of the gauge use: Measuring physical properties of materials	<input checked="" type="checkbox"/> Not applicable <input type="checkbox"/> Uses are: (Submit safety analysis supporting safe use)

APPENDIX B

Yes	No	Radioisotope	Manufacturer or Distributor Model No.	Quantity	Use As Listed on SSD Certificate	Specify Other Uses Not Listed on SSD Certificate
	X	Californium-252	Sealed source manufacturer or distributor and model number: <hr/> Device manufacturer or distributor and model number: <hr/>	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: <hr/> <hr/> <hr/> <hr/> 	<input type="checkbox"/> Not applicable <input type="checkbox"/> Uses are: <hr/> (Submit safety analysis supporting safe use)
	X	Other Isotope (Specify):	Sealed source manufacturer or distributor and model number: <hr/> Device manufacturer or distributor and model number: <hr/>	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: <hr/>	<input type="checkbox"/> Not applicable <input type="checkbox"/> Uses are: <hr/> (Submit safety analysis supporting safe use)
<i>Financial Assurance Required and Evidence of Financial Assurance Provided</i>						

APPENDIX B

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>John Kalisz, III</u></p>	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 checked="" type="checkbox"/>	<input type="checkbox"/>
<p>8. TRAINING FOR INDIVIDUALS WORKING IN OR FREQUENTING RESTRICTED AREAS</p> <p>Troxler</p>	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 checked="" 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	
<p>10. RADIATION SAFETY PROGRAM - SURVEY INSTRUMENTS</p> <p>S.E. International Inc. Monitor 4</p>	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 checked="" type="checkbox"/>	<input type="checkbox"/>

Ludlum Measurements, Inc.
Model 2401-EW Survey Meter

APPENDIX B

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 checked="" type="checkbox"/>	<input type="checkbox"/>
10. RADIATION SAFETY PROGRAM - OCCUPATIONAL DOSIMETRY	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 checked="" 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 checked="" type="checkbox"/> <input type="checkbox"/>	<input type="checkbox"/>
10. RADIATION SAFETY PROGRAM - LEAK TEST	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 checked="" type="checkbox"/>	<input type="checkbox"/> The information in Appendix J supporting a request to perform leak testing and sample analysis is attached.

McDowell & Associates

21355 Hatcher Avenue
Ferndale, Michigan 48220

Phone: (248) 399-2066 • Fax: (248) 399-2157

FAX TRANSMITTAL SHEET

To: Mr. Bill Reichhold

Nuclear Regulatory Commission

At: (630) 515-1078

From: John Kalisz, III, P.E.

Date: November 16, 2015

We are sending 7 pages including this cover page.

Comments:

We are hereby resubmitting our completed License Renewal Application for your review.

Please let us know if everything is in order.

