

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.

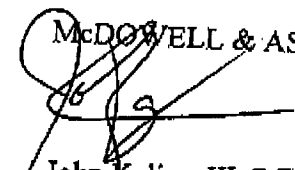
It should be understood that the undersigned is the president of McDowell & Associates and also the Radiation Safety Officer.

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

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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:

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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

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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) |

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| 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

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| 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. |

APPENDIX B

| Item No. And Title | Suggested Response | Yes | Alternative Procedures Attached |
|--|---|--|--|
| 10. RADIATION SAFETY PROGRAM - MAINTENANCE | <p><i>Routine Cleaning and Lubrication</i></p> <p>We will implement and maintain procedures for routine maintenance of our gauges according to each manufacturer's recommendations and instructions.</p> <p><i>Non-Routine Maintenance</i></p> <p>We will send the gauge to the manufacturer or other person authorized by NRC or an Agreement State to perform non-routine maintenance or repair operations that require the removal of the source or source rod from the gauge.</p> | <input checked="" type="checkbox"/> <input checked="" type="checkbox"/> | <input type="checkbox"/> <input type="checkbox"/> The information listed in Appendix G supporting a request to perform non-routine maintenance in-house is attached. |
| 10. RADIATION SAFETY PROGRAM - TRANSPORTATION | The applicant is <i>not</i> required to submit its response to transportation during the licensing process. However, 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 to waste management during the licensing process. However, the licensee should develop, implement, and maintain gauge transfer and disposal procedures in its radiation protection program. | Need Not Be Submitted With Application | |

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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.

