

From: [Elliott, Robin](mailto:Robin.Elliott@valleyinspection.net)
To: info@valleyinspection.net
Cc: [Reichard, Michael](mailto:Michael.Reichard@valleyinspection.net)
Subject: REQUEST FOR ADDITIONAL INFORMATION CONCERNING APPLICATION FOR RENEWAL OF LICENSE, CONTROL NO. 588973
Date: Tuesday, November 24, 2015 8:45:00 AM

Docket No. 03031172
License No. 37-28385-01
Control No. 588973

Robert W. Kratzer
President & Radiation Safety Officer
Valley Inspection Service, Inc.
430 Business Park Lane
Allentown, PA 18109

SUBJECT: VALLEY INSPECTION SERVICE, INC., REQUEST FOR ADDITIONAL INFORMATION CONCERNING APPLICATION FOR RENEWAL OF LICENSE, CONTROL NO. 588973

Dear Mr. Kratzer:

Please acknowledge receipt of this communication.

This is in reference to your application dated September 24, 2015 requesting to renew Nuclear Regulatory Commission License No. 37-28385-01. In order to continue our review, we need the following additional information:

1. In your application you listed a Cesium-137 calibrator; however, you requested temporary job sites only. Do you intend to perform radiation survey meter calibrations at temporary job sites? If so, you will need to include this activity in your operating and emergency procedures.
2. With regard to Section 6 of your Radiography Training Procedures addresses Previously Qualified Individuals.
 - a. Confirm that if the Radiation Safety Officer (RSO) waives the training and time required for on the job training requirements for a radiographer based on certification or documented previous past experience, then the past experience must be verified and documented as meeting Valley Testing Services qualification/training commitments. In addition, confirm that if you are unable to verify that the past experience meets your license commitments you will retrain these individuals to ensure your license commitments are met.
 - b. Please confirm in section 6.3 that the "equipment" they will receive instruction on includes exposure devices and associated equipment, as well as radiation survey meters and other radiation monitoring devices as discussed in Section 8.8 of NUREG 1556, "Consolidated Guidance About Materials Licenses, Program-Specific Guidance About Industrial Radiography Licenses" dated August 1998.
3. Please confirm that the classroom instruction of your training materials (provided in pages 14-

17 of the Radiography Training Procedure) includes proper use of personnel monitoring equipment, limitations of survey meters, survey techniques and the levels of radiation from licensed material as required by 10 CFR 34.43(g).

4. With regard to Section 6.0 Instrument Calibration of your Operating and Emergency Procedure, please provide the following:
 - a. Confirm that personnel will wear a radiation dosimeter when performing instrument calibrations.
 - b. You indicated that calibrations may be performed by the RSO, ARSO or specifically trained and qualified radiographers. Please provide the qualifications of the ARSO and a description of the training required for the other qualified radiographers you intend to allow to perform instrument calibrations as requested by the applicant in Section 8.10.2 of NUREG 1556, "Consolidated Guidance About Materials Licenses, Program-Specific Guidance About Industrial Radiography Licenses" dated August 1998.
 - c. In Section 6.2.w the calibration sticker that is affixed to the meter is described. Appendix J of NUREG 1556, "Consolidated Guidance About Materials Licenses, Program-Specific Guidance About Industrial Radiography Licenses" dated August 1998 indicates that the source used for the calibration should be included on the sticker as well as a chart for each scale indicating the average correction factor for that scale if it is greater than $\pm 20\%$. Please confirm that this information will be included as appropriate.
5. Please confirm the following with regard to the Operating and Emergency Procedures:
 - a. Section 6.3.a should be referencing the dosimeter rather than the survey instrument as stated.
 - b. Section 6.4.a should be referencing the rate alarmeter rather than the survey instrument as stated.
 - c. Section 8.0 Daily Inspection and Maintenance of Radiographic Equipment includes a check of Radiation Detection Equipment. In addition to the check of the survey meter described in Section 8.2 please describe the checks that are performed on the alarmeter and the pocket dosimeter as indicated in Section 8.10.9.7 Daily Inspection and Maintenance of Radiographic Equipment of NUREG 1556, "Consolidated Guidance About Materials Licenses, Program-Specific Guidance About Industrial Radiography Licenses" dated August 1998.

Current NRC regulations and guidance are included on the NRC's website at 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 by letter or fax (610) 337- 5269 and refer to Mail Control No. 588973. If you have any technical questions regarding this deficiency letter, please call me at (610) 337-5076.

In order to continue a prompt review of your application, please respond within 30 calendar days from the date of this communication.

Regards,

Robin L. Elliott

Health Physicist

U. S. Nuclear Regulatory Commission

Region I, Division of Nuclear Materials Safety

2100 Renaissance Blvd

King of Prussia, PA 19406-2713

(610) 337-5076 voice

(610) 337-5269 fax

Robin.Elliott@nrc.gov