

## Walt, GERALYN

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**From:** Miller, John  
**Sent:** Monday, January 11, 2016 1:28 PM  
**To:** georgepigott@pigottengineering.com  
**Subject:** Request for additional information - Mail Control No 589336

George E. Pigott & Associates  
License No. 47-25105-01  
Docket No. 03031762  
Control No. 589366

Mr. Pigott

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.

1. In Item 3 of your application dated October 29, 2015, you indicate that the licensed material will be stored at 1 Viking Road, White Hall, West Virginia. However, your current license authorizes you to store license material at your facilities located at 7 Viking Road, White Hall, West Virginia. Please clarify the discrepancy.
2. In item 9 of your application that addresses facilities and equipment, you did not indicate that you possess a survey meter capable of detecting gamma radiation or for determining source integrity after an accident involving a nuclear gauge. On the NRC Form 591M dated March 22, 2013 and signed by you documenting the inspection performed at your facility on March 12, 2013, you committed to acquiring a survey meter that meets the criteria in section entitled "Radiation Safety Program—Instruments" in NUREG 1556, Vol. 1, Rev.1 dated November 2001. Please confirm that you have a survey meter.
3. In the "Personnel Monitoring" section of your application you indicated that the mandatory use of dosimeters has been discontinued. Section 8.10.5 of NUREG 1556, Vol. 1, Rev.1 dated November 2001 states that you should commit to maintaining for inspection by 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 commit to providing dosimetry processed and evaluated by an NVLAP-approved processor. If you elect to develop documentation to demonstrate that individuals will not receive 10 percent of the allowable limit, please consult Appendix I of NUREG 1556, Vol. 1, Rev.1 dated November 2001 for guidance. Please respond.
4. In your application you have submitted emergency procedures but you did not submit operating procedures. Section 8.10.7 of NUREG 1556, Vol. 1, Rev.1 dated November 2001 states that you should do the following:
  - a. Implement and maintain the operating and emergency procedures in Appendix H of NUREG-1556, Vol. 1, Rev. 1, 'Consolidated Guidance about Materials Licenses: Program-Specific Guidance about Portable Gauge Licenses,' dated November 2001 (including ERRATA Sheet dated July 5, 2005), and provide copies of these procedures to all gauge users and at each job site; or

- b. 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, 'Consolidated Guidance about Materials Licenses: Program-Specific Guidance about Portable Gauge Licenses,' dated November 2001(including ERRATA Sheet dated July 5, 2005); or
  - c. Submit alternative procedures.
5. Section 8.10.9 of NUREG 1556, Vol. 1, Rev.1 dated November 2001 states that the licensee should submit either of the following statements concerning routine cleaning and lubrication:
- a. We will implement and maintain procedures for routine maintenance of our gauges according to each manufacturer's recommendations and instructions; or
  - b. Submit alternate procedures for NRC review.

Please respond in writing with a **signed and dated 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. 589336 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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