



April 22, 2016

Mr. Scott Wilson, Health Physicist
Commercial, Industrial, R&D, and Academic Branch
Division of Nuclear Materials Safety
US Nuclear Regulatory Commission Region I
2100 Renaissance Boulevard, Suite 100
King of Prussia, PA 19406-2713

Br. 2

Re: Amendment of U.S. Nuclear Regulatory Commission Materials License 37-17717-02 *103016053*

Dear Mr. Wilson:

Pursuant to guidance provided in NUREG-1556, please find attached Form 313 "Application for Materials License", submitted for amendment of our license 37-17717-02.

This Amendment is pursuant to us transferring ownership of twelve Troxler Surface Gauges (identified on the attached Transfer Letter) to **Powers Engineering and Construction Testing, LLC – PADEP License# PA-1540**. I have also included copies of the latest Leak Testing Reports for the applicable gauges.

If you need further details and/or information, please feel free to contact me at your convenience. I can be reached at 814-472-7700, Ext. 1338 or via email at bill.stenger@lrkimball.com. Thank you for your assistance in this matter.

Sincerely,

William E. Stenger
Radiation Safety Officer

Attachments

ARCHITECTURE • ENGINEERING • COMMUNICATIONS TECHNOLOGY
AVIATION | CIVIL | CONSTRUCTION SERVICES | DATA SYSTEMS | ENVIRONMENTAL
FACILITIES ENGINEERING | GEOSPATIAL | NETWORKS | PUBLIC SAFETY | TRANSPORTATION

L.R. Kimball Headquarters • 615 West Highland Avenue • P.O. Box 1000 • Ebensburg, PA 15931 • Phone: 814.472.7700 • Fax: 814.472.7712 • www.lrkimball.com

REC'D IN LIT 04/22/2016

590734
NRC/RGNI MATERIALS-002

NRC FORM 313
(04-2016)
10 CFR 30, 32, 33, 34
35, 36, 37, 39, and 40

U.S. NUCLEAR REGULATORY COMMISSION

APPROVED BY OMB: NO. 3150-0120

EXPIRES: 04/30/2016



**APPLICATION FOR MATERIALS
LICENSE**

Estimated burden per response to comply with this mandatory collection request: 4.3 hours. Submittal of the application is necessary to determine that the applicant is qualified and that adequate procedures exist to protect the public health and safety. Send comments regarding burden estimate to the FOIA, Privacy, and Information Collections Branch (T-5 F53), U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001, or by e-mail to Infocollections.Resource@nrc.gov, and to the Desk Officer, Office of Information and Regulatory Affairs, NEOB-10202, (3150-0120), Office of Management and Budget, Washington, DC 20503. If a means used to impose an information collection does not display a currently valid OMB control number, the NRC may not conduct or sponsor, and a person is not required to respond to, the information collection.

INSTRUCTIONS: SEE THE APPROPRIATE LICENSE APPLICATION GUIDE FOR DETAILED INSTRUCTIONS FOR COMPLETING APPLICATION. SEND TWO COPIES OF THE ENTIRE COMPLETED APPLICATION TO THE NRC OFFICE SPECIFIED BELOW. *AMENDMENTS/RENEWALS THAT INCREASE THE SCOPE OF THE EXISTING LICENSE TO A NEW OR HIGHER FEE CATEGORY WILL REQUIRE A FEE.

APPLICATION FOR DISTRIBUTION OF EXEMPT PRODUCTS FILE APPLICATIONS WITH:

MATERIALS SAFETY LICENSING BRANCH
DIVISION OF MATERIAL SAFETY, STATE, TRIBAL AND RULEMAKING PROGRAMS
OFFICE OF NUCLEAR MATERIALS SAFETY AND SAFEGUARDS
U.S. NUCLEAR REGULATORY COMMISSION
WASHINGTON, DC 20555-0001

ALL OTHER PERSONS FILE APPLICATIONS AS FOLLOWS:

IF YOU ARE LOCATED IN:

ALABAMA, CONNECTICUT, DELAWARE, DISTRICT OF COLUMBIA, FLORIDA, GEORGIA, KENTUCKY, MAINE, MARYLAND, MASSACHUSETTS, NEW HAMPSHIRE, NEW JERSEY, NEW YORK, NORTH CAROLINA, PENNSYLVANIA, PUERTO RICO, RHODE ISLAND, SOUTH CAROLINA, TENNESSEE, VERMONT, VIRGINIA, VIRGIN ISLANDS, OR WEST VIRGINIA,

SEND APPLICATIONS TO:

LICENSING ASSISTANCE TEAM
DIVISION OF NUCLEAR MATERIALS SAFETY
U.S. NUCLEAR REGULATORY COMMISSION, REGION I
2100 RENAISSANCE BOULEVARD, SUITE 100
KING OF PRUSSIA, PA 19406-2713

IF YOU ARE LOCATED IN:

ILLINOIS, INDIANA, IOWA, MICHIGAN, MINNESOTA, MISSOURI, OHIO, OR WISCONSIN,
SEND APPLICATIONS TO:

MATERIALS LICENSING BRANCH
U.S. NUCLEAR REGULATORY COMMISSION, REGION III
2443 WARRENVILLE ROAD, SUITE 210
LISLE, IL 60532-4352

ALASKA, ARIZONA, ARKANSAS, CALIFORNIA, COLORADO, HAWAII, IDAHO, KANSAS, LOUISIANA, MISSISSIPPI, MONTANA, NEBRASKA, NEVADA, NEW MEXICO, NORTH DAKOTA, OKLAHOMA, OREGON, PACIFIC TRUST TERRITORIES, SOUTH DAKOTA, TEXAS, UTAH, WASHINGTON, OR WYOMING,

SEND APPLICATIONS TO:

NUCLEAR MATERIALS LICENSING BRANCH
U.S. NUCLEAR REGULATORY COMMISSION, REGION IV
1600 E. LAMAR BOULEVARD
ARLINGTON, TX 76011-4511

PERSONS LOCATED IN AGREEMENT STATES SEND APPLICATIONS TO THE U.S. NUCLEAR REGULATORY COMMISSION ONLY IF THEY WISH TO POSSESS AND USE LICENSED MATERIAL IN STATES SUBJECT TO U.S. NUCLEAR REGULATORY COMMISSION JURISDICTIONS.

1. THIS IS AN APPLICATION FOR (Check appropriate item)

- A. NEW LICENSE
- B. AMENDMENT TO LICENSE NUMBER 37-17717-02
- C. RENEWAL OF LICENSE NUMBER _____

2. NAME AND MAILING ADDRESS OF APPLICANT (Include ZIP code)

CDI - Infrastructure, LLC d/b/a L.R. Kimball
615 West Highland Avenue
Ebensburg, PA 15931

3. ADDRESS WHERE LICENSED MATERIAL WILL BE USED OR POSSESSED

L.R. Kimball
725 West Triumph Street
Ebensburg, PA 15931

4. NAME OF PERSON TO BE CONTACTED ABOUT THIS APPLICATION

William E. Stenger, RSO

BUSINESS TELEPHONE NUMBER
(814) 472-7700

BUSINESS CELLULAR TELEPHONE NUMBER
(814) 243-2971

BUSINESS EMAIL ADDRESS
bill.stenger@cdicorp.com

SUBMIT ITEMS 5 THROUGH 11 ON 8-1/2 X 11" PAPER. THE TYPE AND SCOPE OF INFORMATION TO BE PROVIDED IS DESCRIBED IN THE LICENSE APPLICATION GUIDE.

5. RADIOACTIVE MATERIAL
a. Element and mass number; b. chemical and/or physical form; and c. maximum amount which will be possessed at any one time.

6. PURPOSE(S) FOR WHICH LICENSED MATERIAL WILL BE USED.

7. INDIVIDUAL(S) RESPONSIBLE FOR RADIATION SAFETY PROGRAM AND THEIR TRAINING AND EXPERIENCE.

8. TRAINING FOR INDIVIDUALS WORKING IN OR FREQUENTING RESTRICTED AREAS.

9. FACILITIES AND EQUIPMENT.

10. RADIATION SAFETY PROGRAM.

11. WASTE MANAGEMENT.

12. LICENSE FEES (Fees required only for new applications, with few exceptions*)
(See 10 CFR 170 and Section 170.31)

FEE CATEGORY

N/A

AMOUNT ENCLOSED \$

13. CERTIFICATION. (Must be completed by applicant) THE APPLICANT UNDERSTANDS THAT ALL STATEMENTS AND REPRESENTATIONS MADE IN THIS APPLICATION ARE BINDING UPON THE APPLICANT.

THE APPLICANT AND ANY OFFICIAL EXECUTING THIS CERTIFICATION ON BEHALF OF THE APPLICANT, NAMED IN ITEM 2, CERTIFY THAT THIS APPLICATION IS PREPARED IN CONFORMITY WITH TITLE 10, CODE OF FEDERAL REGULATIONS, PARTS 30, 32, 33, 34, 35, 36, 37, 39, AND 40, AND THAT ALL INFORMATION CONTAINED HEREIN IS TRUE AND CORRECT TO THE BEST OF THEIR KNOWLEDGE AND BELIEF.

WARNING: 18 U.S.C. SECTION 1001 ACT OF JUNE 25, 1948 62 STAT. 749 MAKES IT A CRIMINAL OFFENSE TO MAKE A WILLFULLY FALSE STATEMENT OR REPRESENTATION TO ANY DEPARTMENT OR AGENCY OF THE UNITED STATES AS TO ANY MATTER WITHIN ITS JURISDICTION.

CERTIFYING OFFICER -- TYPED/PRINTED NAME AND TITLE

William Stenger, Director - Geotechnical Services

SIGNATURE

DATE

4-22-16

FOR NRC USE ONLY

TYPE OF FEE	FEE LOG	FEE CATEGORY	AMOUNT RECEIVED	CHECK NUMBER	COMMENTS
			\$		
APPROVED BY				DATE	

Supplement A

2016 Application for Amendment of Material License 31-17717-02

5. Radioactive Material

- A. Element and mass number;
- B. Chemical and/or physical form; and
- C. Maximum amount which will be possessed at any one time.

A	B	C
Cesium 137	Sealed Sources (QSA Models CDW556, CDCQ4431; Isotope Product Laboratories Model HEG-137; General Nuclear Model 2184; US Nuclear Corp. Model 373; Troxler Dwg. A-102112; Humbolt Scientific Dwg. HIS 2200064; CPN Model CPN-131)	260 Millicuries total. No single source to exceed the maximum activity specified in the certificate of registration issued by the NRC and/or Agreement State.
Americium 241	Sealed Sources (Troxler Dwg. A-102451, A-102700, C-106580; Humbolt Scientific Dwg. HIS 2200067; CPN Model CPN-131)	860 Millicuries total. No single source to exceed the maximum activity specified in the certificate of registration issued by the NRC and/or Agreement State.

6. Purpose(s) for which licensed material will be used

Troxler Electronic Laboratories Model Nos. 1351, 3322, 3400 Series; Humbolt Scientific Inc. Model 5001C; and InstroTek (formerly CPN) Model 501DR portable gauging devices purpose is measuring physical properties of materials.

7. Individual(s) responsible for radiation safety program and their training experience

Name: William E. Stenger, REM, CES, CRS

Mr. Stenger successfully completed his initial training in the use of nuclear testing equipment by successful completion of the course "Troxler Electronic Laboratories, Inc. Training Course for The Use of Nuclear Testing Equipment" on 10/12/1993.

Mr. Stenger successfully completed training in the Rules and Regulation governing Hazmat and refresher training requirements: 49CFR Subpart H and IATA 1.5.2, present by North East Technical Services, Inc. on 4/6/2008

Mr. Stenger successfully completed North East Technical Services, Inc. "Radiation Safety Officer Training Course" on 4/6/2008

Mr. Stenger successfully completed refresher training in the Rules and Regulation governing Hazmat and training requirements: 49CFR Subpart H and IATA 1.5.2, presented by North East Technical Services, Inc. on 2/11/2016.

8. Training for individuals working in or frequenting restricted areas

Before using licensed materials, authorized users will have successfully completed training in the Rules and Regulation governing Hazmat and refresher training requirements: 49CFR Subpart H and IATA 1.5.2. Refreshers for the above-mentioned training will be performed at frequencies stipulated by the NRC.

Response to questions 9 thru 11 is included in the following Radiation Safety Program:

RADIATION SAFETY PROGRAM

The following represents the CDI – Infrastructure, LLC d.b.a. L.R. Kimball (L.R. Kimball) Radiation Safety Program. This Program is designed to help promote safety among our gauge operators, as well as to document compliance with applicable State (PA Title 25, Rules and Regulations, Article V, Radiological Health) and Federal (Title 10 CFR Chapter 1)

regulations. Any questions regarding this Program or any related items should be directed to the Radiation Safety Officer (RSO).

How Radiation Affects the Human Body

Radiation causes ionization in the molecules of living cells. The ions react with other atoms in the cell causing damage that interferes with vital cell processes and with cell reproduction. At low doses, such as we receive from natural background radiation, the cell may be able to repair the damage with no adverse effect. At higher doses, the cells might not be able to repair the damage and the cells die or may reproduce abnormal cells that can become cancerous. The primary risk from occupational exposure to radiation is a slightly increased risk of developing cancer. Several factors influence how much effect a given radiation dose will have on living cells:

- A. All cells are not equally sensitive to radiation. Cells that divide rapidly, like blood cells and the lining of the GI tract, are more susceptible to damage than cells that divide slowly, like nerve and brain cells.
- B. Dose to the whole body carries greater risk than dose to a portion of the body.
- C. A given dose received over long time period (years) is less likely to cause an effect than the same dose received over a short time period (hours).

Overall Goals of the Radiation Safety Program

- A. Protecting the general public and environment from unnecessary exposure to radiation
- B. Proper training and instruction to workers includes:
 - The "As Low As Reasonably Achievable" (ALARA) program and personnel radiation monitoring
 - Safely and securely operating the gauge at the worksite
 - Workers knowledge of emergency procedures and radiation detection equipment
 - Safely and securely transporting gauges
 - Maintenance and leak tests
- C. Inventory and disposal recordkeeping
- D. Self-reporting, corrections and enforcement of the program

Annual Audits and Inspections

In accordance with Nuclear Regulatory Commission (NRC) and Pennsylvania Department of Environmental Protection (PADEP) regulations, all use and possession of radioactive materials is under the direction and supervision of the L.R. Kimball Radiation Safety Officer (RSO), with support from senior management. The RSO is a single point of accountability and responsibility between the regulatory agency and the licensee. The RSO is responsible for all aspects of the Radiation Safety Plan. The designated RSO for L.R. Kimball is presently William E. Stenger, who will carry out the duties and enforce the conditions of the license.

The Annual Audit

The RSO will annually conduct an audit of the gauge safety program, as well as checking, reviewing and correcting any deficiencies. All copies of audits will be retained.

The RSO will conduct periodic internal inspections, including in person observations of worker actions with gauges during transport and transportation.

Organization & Scope of Program

The RSO will ensure that the original conditions and information on the license stays current, or when needed, file for timely amendments including: address changes; change in ownership; bankruptcies; and notice of a new and properly trained RSO.

The RSO will review the license to ensure that gauge models match and source quantities have not been exceeded and will ensure that the Sealed Source and Device (SSD) Certificate or Sheet for each type of gauge are on file.

The RSO will check to make sure that manufacturer operation & maintenance manuals are on hand for each type of gauge.

It is the responsibility of each and every user to make sure the gauges are used for the way they are intended.

RSO Responsibilities

The RSO will review standard operating procedures and stop activities that are considered unsafe.

The RSO will review the license and Sealed Source and Device Registration and manufacturer's recommendations and instructions. The RSO will make sure the conditions match up regarding the model/type of gauge, number of gauges allowed, the type of operations licensed for, storage requirements, and maintenance restrictions and schedule.

The RSO will make sure all employees are trained in accordance with applicable regulations, and that the training certificates are on file.

The RSO will make sure all necessary personnel are using personnel monitoring devices (Dosimetry Badges) and records are kept on file, as well as distributed to the applicable personnel.

The RSO and all gauge users will make sure all gauges are locked and secured during storage and transportation.

All gauge users, will have contact information on hand (including on file, in the storage area, and with each gauge) for proper authorities (RSO, licensing agency, police) in case of accident, damage, fire or theft.

The RSO will investigate all unusual occurrences involving the gauge (accident, damage, theft, oversights), determine the cause, identify corrective actions and implement such actions.

The RSO and all gauge users will make sure gauges that are transported meet all USDOT Hazardous Materials requirements.

The RSO will make sure that gauge transfers and disposals are properly documented.

The RSO will make sure all records are accounted for and maintained.

The RSO will keep the license up-to-date, check the expiration date, request renewals and amendments in a timely manner.

The RSO will give advance notice of reciprocity.

Training & Instructions to Workers

All employees working with gauges and preparing gauges for transport or transporting gauges are to be properly trained.

The RSO will ensure, per Code of Federal Regulation (CFR) 19.12, that all employees expected to receive an excess of 100 mrem/yr occupational dose be given special instructions. Although gauge users typically receive less than this amount it is assumed that they may exceed this limit and are therefore subject to these instructions:

- Storage, transfer & uses of gauges.
- Exposure issues and ALARA.
- Required safety training.
- How to report overexposure concerns.
- Gauge users know how to interpret exposure reports.
- Gauge users receive emergency procedures training.
- Gauge users will receive refresher training (every three years minimum) on these topics.
- Each gauge operator must complete an approved gauge safety course before using the gauge.
- The RSO will have training certificates on file for each worker, including Initial Gauge Safety Training.
- HAZMAT Training and Refresher.
- The RSO may conduct spot interviews with each worker to determine if they are knowledgeable of emergency procedures.
- The RSO or their designate will observe how workers operate the gauge(s) in the field.
- The RSO or their designate will observe workers performing routine cleaning & lubrication.
- The RSO or their designate will observe workers transporting the gauge.
- The RSO or their designate will observe workers checking a gauge in and out of storage.
- The RSO will make sure each worker demonstrates safe handling and security during operation, transportation and storage of the gauge.
- The RSO will make sure USDOT HAZMAT (49 CFR 172.700-704) training is provided for each worker involved in preparing and/or transporting a gauge.
- HAZMAT training records are kept on file in the RSO's Office.

Radiation Survey Instruments

L.R. Kimball owns a *Radiation Alert Monitor 4/4EC* radiation survey meter. In the event of an accident it will be used to detect the location of a dislodged source, determine the Transport Index of a damaged gauge or determine the radiation levels around a storage area. It will also be used to determine if the gauge sliding block is malfunctioning.

The RSO will make sure the survey meter meets the criteria of the regulatory agency. Typically this requires a survey meter that is able to detect gamma radiation and be recalibrated annually. Calibration for the L.R. Kimball meter is currently performed by *Applied Health Physics Inc.*

Gauge Inventory

The RSO will complete an inventory of gauges every 6 months. The inventory sheet will be maintained in the RSO's files. Monthly usage records are also kept at the storage area with the RSO's designate.

The RSO will have a receipt for each gauge added to the inventory in the calendar year that shows the date each gauge was obtained and entered into the inventory.

Personnel Radiation Protection

The RSO will provide personnel dosimetry monitoring to all gauge users. The dosimetry, typically in the form of a film badge, ensures that ALARA practices are being met and also creates a record that documents employees are receiving minimal exposure levels.

A key component of this Radiation Protection Program is a solid adherence to ALARA considerations. The RSO will make sure that ALARA considerations (time, distance & shielding) are being taught and practiced and incorporated as mandated by the Radiation Protection Program.

The RSO will make sure, that if any gauge workers are not provided dosimetry, documentation is provided confirming that they are receiving less than 500 mrem per year.

The RSO will continually check to see if conditions of the activities of gauge workers not wearing dosimetry changed to where the possibility of receiving greater than 500 mrem per year exists. If they did change The RSO will perform a new evaluation.

The RSO will make sure that the dosimetry supplier is NVLAP approved.

The RSO will make sure that dosimetry is changed on time.

The RSO will review the dosimetry reports as they are received.

The RSO will make sure that if a worker declared her pregnancy she was limited to a maximum of 500 mrem for the term of the pregnancy. The RSO will make sure embryo/fetus dose records were kept on file.

The RSO will make sure all exposure, survey, monitoring and evaluation records kept on file.

Public Dose

Appropriate steps will be taken to protect the general public (non-gauge workers) from exposure to radiation.

Exposure levels to the general public are to be below 100mrem in a year or 2mrem in any 1 hour. Dosimetry will be measure via an "Area Monitor" dosimetry badge.

Gauges are stored in a manner required to keep doses to the public below 100mrem in a year.

The RSO will conduct a survey or evaluation of public access areas around the storage area to ensure that exposure levels are below 100mrem per year.

The RSO will monitor any gauge additions or changes to the storage area, security or use of the surrounding areas that would necessitate a new survey or evaluation.

Gauges are stored in a manner that prevents unauthorized use or removal.

The RSO will keep storage survey and evaluation records on file.

Operating & Emergency Procedures

The RSO will develop, implement and maintain L.R. Kimball operating & emergency procedures.

All workers will have a copy of these procedures and know what steps to take in the event of an emergency. Procedures should include these instructions:

- Using & maintaining the gauge
- Security during transport and storage
- Control & surveillance during use
- Keep exposures ALARA
- Constant accountability during use
- How to deny access to a damaged gauge
- Steps to take and who to contact when a gauge is damaged

The RSO will make sure the above required elements, as specified by the regulatory agency, are part of the procedures.

Each gauge worker and gauge case have a current copy of the operating & emergency procedures, including RSO office, cell & home telephone numbers as well as the manufacturer's and regulatory agency emergency contact numbers.

Leak Tests

Each sealed source on each gauge leak will be tested on time (6 months intervals) and the leak tests will be performed per the descriptions and requirements of the regulatory agency and the license. Currently, our leak tests are analyzed by *North East Technical Services*.

Each user will make sure all gauges have a current leak test before being removed from storage.

The RSO will make sure leak test results are kept on file and in the log book for each gauge.

If any sources are found to be leaking, the gauge will be immediately pulled from service and the proper regulatory agency notified.

Maintenance of Gauges

The RSO or their designate will make sure the gauges are routinely cleaned and lubricated per the manufacturer's procedures, thereby allowing optimum safety and performance. The source rod will not be removed during cleaning.

The RSO will make sure that 3rd party service providers are licensed to handle our gauge models and that our gauges are monitored at all times. Currently, our Troxler gauges are serviced by *North East Technical Services*, and our InstroTek gauges are serviced by *InstroTek, Inc.*

Transportation

To assure proper compliance of transportation regulations, the RSO, or their designate, may on occasion conduct spot-checks on workers while they transport a gauge, to assure that HAZMAT requirements are understood and met. The evaluation will commence at the storage area and conclude upon return to the storage area.

Only undamaged, manufacturer-provided and approved, Type "A" Package gauge cases are to be used during every transport of a gauge. Type "A" Package test results for every different type of gauge case in use is to be kept on file.

The RSO will make sure that a "Certificate of Competent Authority" is kept on file for each different type of source used in the gauge. (This will satisfy the requirement for documenting special form certificates. These special form certificates can be obtained through the manufacturer and can usually be downloaded off their website).

Every gauge case will display (2) Radioactive II labels that legibly show the Transport Index (TI), source types & activities, and hazard class (7).

Each gauge case will display a Type A package label denoting UN3332, "Radioactive Material", "Special Form" and "RQ" requirements.

In all instances, every gauge case will be closed and locked for transport.

Applicable bill of lading and emergency response sheets are to be used during every shipment.

The RSO will assure that the shipping papers contain the proper entries: (Shipping name (Radioactive Materials), Hazard Class (7), UN ID Number (3332), Total Quantity (number of gauges), Package Type (Type A), Nuclides (Cesium137 and/or Am241), RQ (if necessary), Description (Radioactive Material), Special Form, Activity (in Becquerels and Millicuries), Yellow II labels, Transport Index (TI), Shipper's name, Certification and signature, Emergency Response Telephone number, Cargo Aircraft Only label.

Gauge cases will be secured against movement during transport.

Double, independent, locked cables, chains or other security devices will be used during transport.

The gauge(s) will be concealed at all times while transported in a vehicle.

The RSO will make sure that any qualified transport incidents are reported to the USDOT.

Auditor's Independent Survey Measurements (If Made)

If any independent auditor is used The RSO will make sure that the survey measurements describe the type, location and result of measurements. The RSO will note if any radiation levels exceed regulatory levels.

Notification & Reports

The RSO will assure that required notifications of incidents are made to the regulatory agencies. This does not include non-emergency oversights that must be noted and corrected in your Radiation Safety Program.

The RSO will make notifications of any lost or stolen gauges and make appropriate reports.

The RSO will report any overexposures or high radiation levels and note the causes and take corrective actions. In the event of any of the above occurrences The RSO will contact the NRC Emergency Operations Center at 301-816-5100 as well as PADEP, if appropriate.

Posting & Labeling

The RSO will be aware and post any documents required by the regulatory agency or other state or local authorities.

The RSO will restrict access to all originals and only post copies of the documents and posters.

The RSO will post copies of regulations and license documents or post a notice as to where these documents can be viewed.

Recordkeeping for Decommissioning

Regulatory agencies require a minimum of 60 days notice before terminating the license and transferring or disposing of all gauges. The RSO will be aware of requirements and will maintain all decommissioning, transfer and disposal documents. The RSO will maintain records important for decommissioning.

Bulletins & Information Notices

L.R. Kimball is currently on the mailing list and/or email list for documents issued by the NRC and/or PADEP. These bulletins/notices are kept on file in the RSO office.

The RSO will make sure that appropriate training and actions are taken in response to these notices.

Special License Conditions or Issues

The RSO will make sure to review any special license conditions or issues pertaining to our licenses (e.g., non-routine maintenance).

Deficiencies Identified In Audit and Corrective Actions Planned

If the RSO discovers any deficiencies or oversights during the year, they will investigate, report, summarize and take corrective actions to rectify the issue. The RSO will document the corrective actions and make sure that corrective actions will be taken at all licensed facilities. The RSO will likewise provide any recommendations for improvements.

Evaluation of Other Factors

The RSO will ensure that senior management is constructively involved and informed about the radiation safety program.

Senior management will assure that the RSO has sufficient time to perform Radiation Safety Duties.

Senior management will assure that the RSO has sufficient staff to support the Radiation Safety Program.

Powers Engineering & Construction Testing



Construction Testing, Inspection, & Management Services - Geotechnical, Civil, & Environmental Engineering

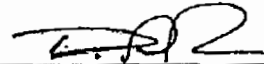
Bill Stenger or Greg Latzo
Radiation Safety Officer
LR Kimball & Associates
615 W Highland Ave.
Edensburg, PA 15931

Dear Bill Stenger ~~or Greg Latzo~~:

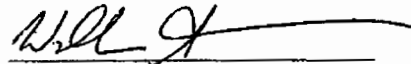
As per our conversations, Powers Engineering and Construction Testing, LLC will accept the transfer of the gauges listed on the chart below from your possession. Before accepting the gauges the DEP has requested that the leak tests be put with the gauges and the boxes are checked to make sure they are labeled with the proper stickers/decals. After the transfer is completed P-ECT will notify the DEP that the gauges are now in our possession and LR Kimball must amend their license to show that the sources have been removed.

Attachment A on the following page shows the 12 gauges that were originally agreed upon and submitted to the DEP by P-ECT last year for transfer.

Signature of Dan Powers (RSO of P-ECT)


Date: 4-20-16

Signature of Bill Stenger ~~or Greg Latzo~~ (RSO of LR Kimball)


Date: 4-21-16

If you have any questions, please contact me at 412-609-4279.

To all involved thank you for your help!

Dan Powers, PE

Powers Engineering and Construction Testing, LLC



Powers Engineering & Construction Testing

Construction Testing, Inspection, & Management Services - Geotechnical, Civil, & Environmental Engineering

Attachment A

Proposed Nuclear Gauges to be put on license - Will be transferred from LR Kiball

LR Kimball #	Serial Number	Gauge Manufacturer	Model Number	PECT Info Only For Panel Repairs	Element #1 & Mass Number	Chemical & or Physical Form	Max Activity - Particular Single Source to Exceed	Element # 2 & Mass Number	Chemical & or Physical Form	Max Activity - Particular Single Source to Exceed
4	9928	Troxler	3411	s	Cs-137	Sealed Source Troxler Dwg. A-102112	8 mCi	Am-241:Be	Sealed Source Troxler Dwg. A-102451	40 mCi
2	8512	Troxler	3411	k	Cs-137	Sealed Source Troxler Dwg. A-102112	8 mCi	Am-241:Be	Sealed Source Troxler Dwg. A-102451	40 mCi
3	9904	Troxler	3411	k	Cs-137	Sealed Source Troxler Dwg. A-102112	8 mCi	Am-241:Be	Sealed Source Troxler Dwg. A-102451	40 mCi
10	12308	Troxler	3411	k	Cs-137	Sealed Source Troxler Dwg. A-102112	8 mCi	Am-241:Be	Sealed Source Troxler Dwg. A-102451	40 mCi
1	6829	Troxler	3411	s	Cs-137	Sealed Source Troxler Dwg. A-102112	8 mCi	Am-241:Be	Sealed Source Troxler Dwg. A-102451	40 mCi
6	13431	Troxler	3411	k	Cs-137	Sealed Source Troxler Dwg. A-102112	8 mCi	Am-241:Be	Sealed Source Troxler Dwg. A-102451	40 mCi
13	23425	Troxler	3430	ok	Cs-137	Sealed Source Troxler Dwg. A-102112	9 mCi	Am-241:Be	Sealed Source Troxler Dwg. A-102451	44 mCi
7	19527	Troxler	3430	ok	Cs-137	Sealed Source Troxler Dwg. A-102112	9 mCi	Am-241:Be	Sealed Source Troxler Dwg. A-102451	44 mCi
8	19526	Troxler	3430	ok	Cs-137	Sealed Source Troxler Dwg. A-102112	9 mCi	Am-241:Be	Sealed Source Troxler Dwg. A-102451	44 mCi
16	23394	Troxler	3440	Needs Repaired	Cs-137	Sealed Source Troxler Dwg. A-102112	9 mCi	Am-241:Be	Sealed Source Troxler Dwg. A-102451	44 mCi
15	23393	Troxler	3440	ok	Cs-137	Sealed Source Troxler Dwg. A-102112	9 mCi	Am-241:Be	Sealed Source Troxler Dwg. A-102451	44 mCi
17	23211	Troxler	3440	Needs Repaired	Cs-137	Sealed Source Troxler Dwg. A-102112	9 mCi	Am-241:Be	Sealed Source Troxler Dwg. A-102451	44 mCi
Prepared on 4-20-16										
Prepared by: Dan P. Powers, PE										



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ATTN: Bill Stenger

Shipping Address: 725 West Triumph St.
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LEAK TEST CERTIFICATE

MD Materials License # MD-13-020-01

This certifies that leak test analysis was conducted on the sample with the following information. The results shown below accurately represent the level of removeable contamination.

Gauge Model	3411	Gauge S/N	6829	Leak Test Date	1/8/2016
Source		Reading in microCuries			
40-3985		0.00007441			
47-3142		0.00000			

Note: 0.005 microCuries (185 Bq) or greater is considered a leaking source. The source(s) tested above may remain in use.

Reviewed by: _____

Douglas Sims

Date: JAN 15 2016

Monday, January 18, 2016



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Gauge Model	3411	Gauge S/N	8512	Leak Test Date	1/8/2016
	Source		Reading in microCuries		
	40-5752		0.00008585		
	47-4896		0.00000		

Note: 0.005 microCuries (185 Bq) or greater is considered a leaking source. The source(s) tested above may remain in use.

Reviewed by: Douglas Sims

Date: JAN 15 2016



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This certifies that leak test analysis was conducted on the sample with the following information. The results shown below accurately represent the level of removeable contamination.

Gauge Model	3411	Gauge S/N	9904	Leak Test Date	1/8/2016
Source		Reading in microCuries			
	40-7369		0.00007441		
	46-1286		0.00000		

Note: 0.005 microCuries (185 Bq) or greater is considered a leaking source. The source(s) tested above may remain in use.

Reviewed by: Doug Le Sims

Date: JAN 15 2016



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Gauge Model	3411	Gauge S/N	9928	Leak Test Date	1/8/2016
Source			Reading in microCuries		
	40-7398		0.00008585		
	46-1310		0.00000		

Note: 0.005 microCuries (185 Bq) or greater is considered a leaking source. The source(s) tested above may remain in use.

Reviewed by: Douglas Sims

Date: JAN 15 2016

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This certifies that leak test analysis was conducted on the sample with the following information. The results shown below accurately represent the level of removeable contamination.

Gauge Model	3411	Gauge S/N	13431	Leak Test Date	1/8/2016
	Source		Reading in microCuries		
	50-1259		0.00008585		
	47-8622		0.00000		

Note: 0.005 microCuries (185 Bq) or greater is considered a leaking source. The source(s) tested above may remain in use.

Reviewed by: _____

Douglas Sims

Date: _____

JAN 15 2016



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This certifies that leak test analysis was conducted on the sample with the following information. The results shown below accurately represent the level of removeable contamination.

Gauge Model	3430	Gauge S/N	19527	Leak Test Date	1/8/2016
Source		Reading in microCuries			
	50-9247		0.00008585		
	47-15009		0.00000		

Note: 0.005 microCuries (185 Bq) or greater is considered a leaking source. The source(s) tested above may remain in use.

Reviewed by: Douglas Sims

Date: JAN 15 2016



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This certifies that leak test analysis was conducted on the sample with the following information. The results shown below accurately represent the level of removeable contamination.

Gauge Model	3430	Gauge S/N	19526	Leak Test Date	1/8/2016
Source		Reading in microCuries			
	50-9246		0.00008585		
	47-15008		0.00000		

Note: 0.005 microCuries (185 Bq) or greater is considered a leaking source. The source(s) tested above may remain in use.

Reviewed by:

Douglas Sims

Date: JAN 15 2016

Monday, January 18, 2016



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This certifies that leak test analysis was conducted on the sample with the following information. The results shown below accurately represent the level of removeable contamination.

Gauge Model	3411	Gauge S/N	12308	Leak Test Date	1/8/2016
	Source		Reading in microCuries		
	50-0466		0.00008585		
	47-7383		0.00000		

Note: 0.005 microCuries (185 Bq) or greater is considered a leaking source. The source(s) tested above may remain in use.

Reviewed by: Douglas Simms

Date: JAN 15 2016



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MD Materials License # MD-13-020-01

This certifies that leak test analysis was conducted on the sample with the following information. The results shown below accurately represent the level of removeable contamination.

Gauge Model	3430	Gauge S/N	23425	Leak Test Date	1/8/2016
	Source		Reading in microCuries		
	75-5466		0.00008585		
	47-19308		0.00000		

Note: 0.005 microCuries (185 Bq) or greater is considered a leaking source. The source(s) tested above may remain in use.

Reviewed by:

Douglas Sims

Date: JAN 15 2016

Monday, January 18, 2016



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This certifies that leak test analysis was conducted on the sample with the following information. The results shown below accurately represent the level of removeable contamination.

Gauge Model	3440	Gauge S/N	23393	Leak Test Date	1/8/2016
	Source		Reading in microCuries		
	75-5433		0.00006487		
	47-19276		0.00000		

Note: 0.005 microCuries (185 Bq) or greater is considered a leaking source. The source(s) tested above may remain in use.

Reviewed by: Doug Le Sire

Date: JAN 15 2016



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This certifies that leak test analysis was conducted on the sample with the following information. The results shown below accurately represent the level of removeable contamination.

Gauge Model	3440	Gauge S/N	23394	Leak Test Date	1/8/2016
Source		Reading in microCuries			
	75-5434		0.00006487		
	47-19277		0.00000		

Note: 0.005 microCuries (185 Bq) or greater is considered a leaking source. The source(s) tested above may remain in use.

Reviewed by: _____

Doug Le Sims

Date: _____

JAN 15 2016



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This certifies that leak test analysis was conducted on the sample with the following information. The results shown below accurately represent the level of removeable contamination.

Gauge Model	3440	Gauge S/N	23211	Leak Test Date	1/8/2016
	Source		Reading in microCuries		
	75-5205		0.00006487		
	47-19074		0.00000		

Note: 0.005 microCuries (185 Bq) or greater is considered a leaking source. The source(s) tested above may remain in use.

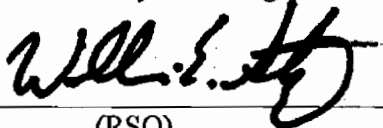
Reviewed by: *Douglas Sims*

Date: JAN 15 2016

L.R. Kimball
Nuclear Gauge Inventory
Updated April 21, 2016

	No.	Serial No.	Location
Surface Gauges	11 – Humbolt 5001C	1540	LRK Storage Room
	12 – Troxler 3430	23421	LRK Storage Room
	14 – Troxler 3430	23426	LRK Storage Room
	18 – Troxler 3440	23436	LRK Storage Room
	19 – Troxler 3440	25871	LRK Storage Room
Depth Density Gauges	2 – Troxler 1351	220	LRK Storage Room
	3 – Troxler 1351	235	LRK Storage Room
	4 – Troxler 1351	234	LRK Storage Room
	5 – Troxler 1351	224	LRK Storage Room
	6 – Troxler 1351	233	LRK Storage Room
	7 – Troxler 1351	198	LRK Storage Room
	8 – Troxler 1351	228	LRK Storage Room
	9 – Troxler 1351	229	LRK Storage Room
	10 – Troxler 1351	236	LRK Storage Room
	11 – Troxler 1351	243	LRK Storage Room
	1-1 Instrotek 501DR	70026	LRK Storage Room
1-2 Instrotek 501DR	70025	LRK Storage Room	
Moisture Gauge	Troxler 3322	274	LRK Storage Room

To the best of my knowledge, this inventory is true and correct for the date stated.



(RSO)

4/21/16

(Date)

This is to acknowledge the receipt of your letter/application dated

04/22/2016, and to inform you that the initial processing which includes an administrative review has been performed.

37-17717-02 (Amendment)

There were no administrative omissions. Your application was assigned to a technical reviewer. Please note that the technical review may identify additional omissions or require additional information.

Please provide to this office within 30 days of your receipt of this card

A copy of your action has been forwarded to our License Fee & Accounts Receivable Branch, who will contact you separately if there is a fee issue involved.

Your action has been assigned Mail Control Number 590734
When calling to inquire about this action, please refer to this control number.
You may call us on (610) 337-5398, or 337-5260.