



**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 [Infocollcts.Resource@nrc.gov](mailto:Infocollcts.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

**PUBLIC**

**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
- C. RENEWAL OF LICENSE NUMBER

02-29222-01

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

**NON-PUBLIC**  
ConformaTech, Inc.  A.3 Sensitive-Security Related  
1425 E. Apache Park Place  A.7 Sensitive Internal  
Tucson, AZ 85714  Other: \_\_\_\_\_

Reviewer: CA Date: 7/19/16

**3. ADDRESS WHERE LICENSED MATERIAL WILL BE USED OR POSSESSED**

Stored at ConformaTech, Inc. 1425 E. Apache Park Place, Tucson, AZ 85714 and portable gauges are dispatched to temporary job sites.

**4. NAME OF PERSON TO BE CONTACTED ABOUT THIS APPLICATION**

John J. Christensen, RSO

**BUSINESS TELEPHONE NUMBER**

(520) 573-2045

**BUSINESS CELLULAR TELEPHONE NUMBER**

(520) 307-3765

**BUSINESS EMAIL ADDRESS**

[gerry.yarab@conformatech.com](mailto:gerry.yarab@conformatech.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**

**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, 38, 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 28, 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**

Gerry Yarab, President

**SIGNATURE**

**DATE**

6-7-2016

**FOR NRC USE ONLY**

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

June 7, 2016

Nuclear Materials Licensing Branch  
U.S. Nuclear Regulatory Commission, Region IV  
1600 East Lamar Boulevard  
Arlington, Texas 76011-4511

**SUBJECT: Renewal of Materials License**  
**ConformaTech, Inc.**  
**1425 E Apache Park Place**  
**Tucson, Arizona 85714**  
**License Number 02-29222-01**  
**Response to Items 5-11, NRC Form 313**

**Items 5 & 6: Materials to be possessed and proposed uses:**

Element/Mass Number	Physical Form	Maximum Quantity	Gauge Model Nos.	Use as Listed on SSD Certificate	Other Uses Not Listed on SSD Certificate
Cs 137 Am 241/Be	Sealed Source – Troxler Drawing: A- 102112 & A-102451	9	Troxler 3440	Soils Testing	N/A
Am 241/Be	Sealed Source - CPN Drawing: CPN 131	1	CPN AC-2	Asphalt Testing	N/A
Cs 137	Sealed Source – Troxler Drawing A- 102112	2	Troxler 4640B	Asphalt Testing	N/A

**Item 7: Individual responsible for radiation safety program and their training an experience**

Radiation Safety Officer: John J. Christensen (See Attached Certificate).

**Item 8: Training for individuals working in or frequent restricted areas**

Before using licensed materials, authorized users will have successfully completed one of the training courses described in the "Criteria" section titled "Training for Individuals Working in or Frequenting Restricted Areas in NUREG-1556, Volume 1, dated November 2001".

**Item 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."

**Item 10: Radiation Safety Program – Audit Program**

The applicant is not required to, and should not, submit its audit program to NRC for review during the licensing phase.

ConformaTech, Inc.  
1425 East Apache Park Place  
Tucson, Arizona 85714  
Tel.: (520) 573-2045  
Fax: (520) 573-0528

**Item 10: Radiation Safety Program – Termination of Activities:**

The applicant is not 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.

**Item 10: Radiation Safety Program – Survey Instruments**

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.

**Item 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 sourced and devices received and possessed under the license.

**Item 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 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.

**Item 10: Radiation Safety Program – Public Dose**

The applicant is not required to submit a response to the public dose section during the licensing phase. The matter will be examined during an inspection.

**Item 10: Radiation Safety Program – Operating and Emergency Procedures**

We will implement and maintain the operating, emergency procedures and security procedures described in the errata sheet to Appendix H of NUREG-1556, Vol. 1, Rev. 1, dated November 2001, and provide copies of these procedures to all gauges users and at each job site. (Errata Sheet is attached)

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.

**Item 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.

**Item 10: Radiation Safety Program - Maintenance**

*Routine Cleaning and Lubrication*

We will implement and maintain procedures for routine maintenance of our gauges according to each manufacturer's recommendations and instructions.

*Non-Routine Maintenance*

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.

**Item 10: Radiation Safety Program - Transportation**

The applicant is not required to submit its response to transportation during the licensing process. However, this issue will be reviewed during inspection.

**Item 11: Waste Management – Gauge Disposal and Transfer**

The applicant is not 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.

Please contact us at your convenience if you require additional information.



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John Christensen  
RSO  
ConformaTech, Inc.



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Gerry Yarab  
President  
ConformaTech, Inc.

06/06/2016

### CONVERSATION RECORD

TIME

4 : 00

AM  
 PM

NAME OF PERSON(S) CONTACTED OR IN CONTACT WITH YOU

Gerry Yarab

TELEPHONE NO.

(520) 573-2045

TYPE OF CONVERSATION

IN-PERSON

E-MAIL

TELEPHONE

INCOMING

OUTGOING

E-MAIL ADDRESS

garry.yarab@conformatech.com

ORGANIZATION

Conformatech, Inc.

SUBJECT

license renewal RFI

**SUMMARY**

I spoke with the president of Conformatech, Inc. regarding the Request for Information that I sent by email on May 25, 2016. We discussed the reasons for my questions on the RFI and he also asked about reciprocity since they do not do much work in NRC jurisdiction. I briefly explained the process, and followed up with an email with the 2016 reciprocity letter attached. He also asked about getting his possession limits increased as they are considering purchasing additional gauges. I told him that was acceptable, but that he needed to add the additional quantity to his application in this RFI response.

**Continue on Page 2**

ACTION REQUIRED

NAME OF PERSON DOCUMENTING CONVERSATION

Casey Alldredge

SIGNATURE

DATE

6/6/16

ACTION TAKEN

TITLE OF PERSON TAKING ACTION

SIGNATURE OF PERSON TAKING ACTION

DATE

## **Allredge, Casey**

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**From:** Gerry Yarab <gerry.yarab@conformatech.com>  
**Sent:** Friday, June 10, 2016 11:41 AM  
**To:** Allredge, Casey  
**Subject:** [External\_Sender] RE: RE: RE: RE: NRC License Renewal Request for Information

That is correct.  
Thanks

*Gerry Yarab, R.G.*  
*President*  
**ConformaTech, Inc.**  
1425 East Apache Park Place  
Tucson, AZ 85714  
PH: 520-573-2045  
FAX: 520-573-0528

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**From:** Allredge, Casey [mailto:Casey.Allredge@nrc.gov]  
**Sent:** Friday, June 10, 2016 7:46 AM  
**To:** Gerry Yarab <gerry.yarab@conformatech.com>  
**Subject:** RE: RE: RE: RE: NRC License Renewal Request for Information

Hi Gerry - Let me make sure that I understand correctly.  
You need authorization on your license for:

1 – Troxler 3411  
8 – Troxler 3440's  
2 – Troxler 4640  
1 – CPN -131

This represents one additional 3440 and one additional 4640, because you may purchase those?

Thanks,

Casey Allredge  
Health Physicist  
USNRC Region IV  
(817)200-1547

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**From:** Gerry Yarab [mailto:gerry.yarab@conformatech.com]  
**Sent:** Thursday, June 09, 2016 5:42 PM  
**To:** Allredge, Casey <Casey.Allredge@nrc.gov>  
**Subject:** [External\_Sender] RE: RE: RE: NRC License Renewal Request for Information

Casey,  
I added an extra 4640 as we may need to purchase one.  
I appear to have accidentally included the 3411 in the 3440 total. I also added one unit to the 3440 as a new purchase. Please note that one 3440 was damaged beyond repair and sent back to Troxler since the last inspection.  
Current units: 1 Troxler 3411, 7 Troxler 3440's, 1 Troxler 4640, and 1 CPN 131.  
Let me know if you want me to update the table.

Thanks

*Gerry Yarab, R.G.*  
*President*  
**ConformaTech, Inc.**  
1425 East Apache Park Place  
Tucson, AZ 85714  
PH: 520-573-2045  
FAX: 520-573-0528

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**From:** Alldredge, Casey [<mailto:Casey.Alldredge@nrc.gov>]  
**Sent:** Thursday, June 09, 2016 3:07 PM  
**To:** Gerry Yarab <[gerry.yarab@conformatech.com](mailto:gerry.yarab@conformatech.com)>  
**Subject:** RE: RE: RE: NRC License Renewal Request for Information

Gerry,

One last question, I noticed in the inspection notes from your previous inspection (in 2012) that you had 11 gauges at that time, but the report lists slightly different models then in your renewal.

The inspector listed: 1 Troxler 3411, 8 Troxler 3440's, 1 Troxler 4640, and 1 CPN 131.  
Your renewal listed: 9 Troxler 3440's, 2 Troxler 4640's and 1 CPN 131

Did you get rid of the 3411 and acquire another 3440 and 4640, or are you adding an extra gauge to the licensee possession limits in case you acquire a new one? I believe we talked about that possibility on the phone Monday.

Thanks,  
Casey

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**From:** Gerry Yarab [<mailto:gerry.yarab@conformatech.com>]  
**Sent:** Thursday, June 09, 2016 2:48 PM  
**To:** Alldredge, Casey <[Casey.Alldredge@nrc.gov](mailto:Casey.Alldredge@nrc.gov)>  
**Cc:** [john.christensen@conformatech.com](mailto:john.christensen@conformatech.com)  
**Subject:** [External\_Sender] RE: RE: NRC License Renewal Request for Information

Casey,

Yes we have procedures in place in conformance with the errata sheet to App. H of NUREG-1556. We will delete the second paragraph in future applications.

Thanks

*Gerry Yarab, R.G.*  
*President*  
**ConformaTech, Inc.**  
1425 East Apache Park Place  
Tucson, AZ 85714  
PH: 520-573-2045  
FAX: 520-573-0528

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**From:** Alldredge, Casey [<mailto:Casey.Alldredge@nrc.gov>]  
**Sent:** Thursday, June 09, 2016 12:22 PM  
**To:** Gerry Yarab <[gerry.yarab@conformatech.com](mailto:gerry.yarab@conformatech.com)>  
**Subject:** RE: RE: NRC License Renewal Request for Information

Gerry,

I only have one detail to confirm. You wrote:

"We will implement and maintain the operating, emergency procedures and security procedures described in the errata sheet to Appendix H of NUREG-1156 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."

The first statement states that you already have procedures, and the second says that you will develop them. Since you are already a licensee it stands to reason that you would already have procedures, you don't need to develop them. Please confirm that you already have procedures described in the errata sheet to App. H of NUREG-1556. You don't need to submit or sign anything else. Replying to this email or calling works fine.

If you have any questions, please let me know,

Thanks,

Casey Alldredge  
Health Physicist  
USNRC Region IV  
(817)200-1547

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**From:** Gerry Yarab [<mailto:gerry.yarab@conformatech.com>]  
**Sent:** Tuesday, June 07, 2016 5:35 PM  
**To:** Alldredge, Casey <[Casey.Alldredge@nrc.gov](mailto:Casey.Alldredge@nrc.gov)>  
**Cc:** [john.christensen@conformatech.com](mailto:john.christensen@conformatech.com)  
**Subject:** [External\_Sender] RE: NRC License Renewal Request for Information

Casey, I have attached our edited forms. Let me know if they're acceptable, and I will send a hard copy to you.

Thanks

*Gerry Yarab, R.G.*  
*President*  
**ConformaTech, Inc.**  
1425 East Apache Park Place  
Tucson, AZ 85714  
PH: 520-573-2045  
FAX: 520-573-0528

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**From:** Alldredge, Casey [<mailto:Casey.Alldredge@nrc.gov>]  
**Sent:** Monday, June 06, 2016 2:26 PM  
**To:** [gerry.yarab@conformatech.com](mailto:gerry.yarab@conformatech.com)  
**Subject:** FW: NRC License Renewal Request for Information

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**From:** Alldredge, Casey  
**Sent:** Friday, May 27, 2016 8:39 AM



To: 'john.christensen@conformatech.com' <[john.christensen@conformatech.com](mailto:john.christensen@conformatech.com)>

**Subject:** NRC License Renewal Request for Information

Good Morning Mr. Christensen,

I am reviewing your license renewal application and have a few questions I need to resolve. Please see the attached request for information, and if you have any questions please let me know.

Thanks,

Casey Alldredge  
Health Physicist  
USNRC Region IV  
(817)200-1547  
(214)448-2945



**UNITED STATES  
NUCLEAR REGULATORY COMMISSION**  
REGION IV  
1600 E. LAMAR BLVD.  
ARLINGTON, TX 76011-4511



## EMAIL

**Name:** John J. Christensen License: 02-29222-01  
Docket: 030-37125  
**Organization:** ConformaTech, Inc. Control: 589998  
**Phone:** 520-573-2045  
**E-mail Address:** Gerry.yarab@conformatech.com  
**From:** Casey C. Aldredge  
**Date:** May 25, 2016  
**Subject:** Application dated January 20, 2016 for License Renewal  
**Pages:** 2

Mr. Christensen:

Per your application dated January 20, 2016 for your license renewal, the items on the next page are deficiencies which require your response. **Please respond to this e-mail by June 10, 2016.** Our fax number is (817) 200-1188. You may respond by e-mail in pdf format if you'd like. My email address is [casey.alldredge@nrc.gov](mailto:casey.alldredge@nrc.gov). When responding to this e-mail, please include the license, docket and control numbers located at the top of this page.

Thanking you in advance for your cooperation, assistance, and prompt response in this matter.

A handwritten signature in blue ink, appearing to read "Casey C. Aldredge".

Casey C. Aldredge  
Health Physicist

1. Please provide the model numbers of the 11 gauges you need authorization for.
2. Item 8 on your application states: "Before using licensed materials, authorized users will have successfully completed one of the training courses described in the "Criteria" section titled "Training for Individuals Working in or Frequenting Restricted Areas" in NUREG-1556, Volume 1."

Please confirm that "Before using licensed materials, authorized users will have successfully completed one of the training courses described in the "Criteria" section titled "Training for Individuals Working in or Frequenting Restricted Areas" in NUREG-1556, Volume 1, **Revision 1, dated November 2001.**"

3. Please state that:

We will implement and maintain the operating, emergency and security procedures described in the errata sheet to 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.

(Errata Sheet is attached)