

From: [Lawyer, Dennis](#)
To: [Lloyd Winters](#)
Subject: Navitus Engineering, Inc., Request for Additional Information Concerning Application for a License Amendment, Control 592482
Date: Thursday, December 29, 2016 9:45:00 AM

Dear Mr. Winters,

This is in reference to your application dated November 29, 2016, requesting for amendment to Nuclear Regulatory Commission License No. 45-35268-01, Docket No. 03038868. In order to continue our review, we need the following additional information:

1. Your application should have been signed by a management representative rather than Mr. Winters. Please submit a letter signed by a management representative indicating that management has reviewed the application and concurs in the statements and representations contained therein. The management representative in our records for your license is Mark D. Smith, President. Note also that a management representative should sign all future correspondence that requests a change in your license.
2. It appears that you are requesting an increase in the licensed material amount to enable the use and storage of up to 12 gauges. However, your stated value for material amounts of 110 mCi Cs-137 and 500 mCi Am-241 is not accurate with the maximum potential activity in each gauge ($12 \times 9 \text{ mCi} = 108 \text{ mCi}$, $12 \times 44 \text{ mCi} = 528 \text{ mCi}$). Please state if you wish to be licensed for 108 mCi Cs-137 and 500 mCi Am-241 or for some other value.
3. It appears you are only using Troxler Electronic Laboratories Model 3411 gauges. Currently you are licensed for the Troxler Electronic Laboratories 3400 series which includes the 3411 gauge and others. Do you wish to be licensed for the Troxler Electronic Laboratories 3400 series or just the Troxler Electronic Laboratories Model 3411 gauge?
4. In your amendment request, It appears that the only change you desire is the amount of material that you will be licensed. If that is the case, you only need to answer the above questions and confirm that you wish to keep your licensing support documents the same as stated in the application dated October 14, 2015. Otherwise, please respond to the below question.
5. In section 10.4, Radiation Safety Program-Occupational Dose, you checked, "We will maintain, for inspection by the NRC, documentation demonstrating that unmonitored individuals are not likely to receive a radiation dose in excess of the limits in 10 CFR 230.1502(a)." However, in the section on personnel monitoring, you state, "Ensure all radioactive materials are used only by individuals who are authorized and that personnel monitoring devices are worn at all times." These two statements are contradictory. Please provide the proper statement form section 10.4, Radiation Safety Program-Occupational Dose.

We will continue our review upon receipt of this information. Please reply to my attention at the Region 1 Office (Address below) and refer to Mail Control No. 592482. If you have technical questions regarding this letter, please call me at (610) 337-5366.

Your reply must be an originally signed and dated letter. The letter may be scanned and submitted as a pdf document attached to an email; or it may be transmitted by facsimile to (610) 337-5269; or it may be sent by regular mail. If we do not receive a reply from you within 30 calendar days from the date of this e-mail, we will assume that you do not wish to pursue your application OR amendment request.

Please respond by e-mail to acknowledge that you have received the e-mail request for additional information.

Region 1 Office Mailing Address: Licensing Assistance Team, US Nuclear Regulatory Commission Region I, 2100 Renaissance Boulevard, Suite 100, King of Prussia, PA 19406-2713.

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