

From: [Lawyer, Dennis](mailto:mbeck@beckengineeringpc.com)
To: mbeck@beckengineeringpc.com
Subject: Beck Engineering, P.C., Request for Additional Information Concerning Application for a License Renewal, Control 594336, License No. 44-30394-01, Docket No. 03034464
Date: Monday, March 27, 2017 1:41:00 PM

Dear Mr. Beck,

This is in reference to your application March 6, 2017, requesting for renewal for Nuclear Regulatory Commission License No. 44-30394-01, Docket No. 03034464. In order to continue our review, we need the following additional information:

1. In your application, you provided a description of the gauge storage area. As stated in NUREG-1556, Volume 1, Rev. 2, "Consolidated Guidance About Materials Licenses Program-Specific Guidance About Portable Gauge Licenses," Section 8.9 is states to "Provide a facility diagram for each permanent portable gauge storage location. Include on the diagram the use of adjacent areas (including above and below). You have provided a description of maintaining security but not did not provide a diagram. Please provide a diagram of the permanent portable gauge storage location, including adjacent area use (above and below) and any additional information associated with public dose.
3. NUREG-1556, Volume 1, Rev. 2, section 8.10.3 describes material receipt and accountability. It says to provide one of the following statements: "Physical inventories will be conducted every 6 months or at other intervals approved by the NRC to account for all sealed sources and devices received and possessed under the license." OR a description and justification of an alternate frequency and/or procedure to account for all sealed sources and devices received and possessed under the license with the statement: "We will develop, implement and maintain procedures for ensuring accountability of licensed materials at all times.." Your procedures states that you will perform an inventory but does not state how often an inventory will be performed. Please make the above statement.
4. NUREG 1556, Volume 1, Rev. 2, section 8.10.2 describes Radiation Monitoring Instruments requirements for portable gauge licensees. Your application did not appear to give any commitments associated with a radiation monitoring equipment. Please state: "We will either possess and use, or have access to and use, a radiation survey meter that meets the criteria in the section titled "Radiation Safety Program— Radiation Monitoring Instruments" in NUREG–1556, Volume 1, Revision 2, "Consolidated Guidance About Materials Licenses: Program-Specific Guidance About Portable Gauge Licenses," in the event of an incident" or provide a description of an alternative procedure for determining source integrity after an incident involving the gauge.
5. In your application you made a statement that you would follow NUREG-1556, Volume 1, Rev. 2 Operating and Emergency Procedures. Section 8.10.7 says to state: ""We will implement and maintain the operating, emergency, and security procedures in Appendix G to NUREG–1556, Volume 1, Revision 2, "Consolidated Guidance About Materials Licenses: Program-Specific Guidance About Portable Gauge Licenses." Copies of these procedures will be provided to all gauge users and will be available at each jobsite." OR Provide the statement: "Operating,

emergency, and security procedures will be developed implemented, and maintained and will meet the criteria in section 8.10.6, "Radiation Safety Program—Operating, Emergency, and Security Procedures," NUREG-1556, Volume 1, Revision 2, "Consolidated Guidance About Materials Licenses: Program-Specific Guidance About Portable Gauge Licenses." Copies of these procedures will be provided to all gauge users and will be available at each jobsite." Your statement did not appear to provide Security Procedures, which section of the NUREG-1556, Volume 1, Rev. 2 will be adhered and that the copies will be provided to each gauge user and be available at each job site. Please provide one of the above statements.

6. In your application, you stated in your procedures that personnel were required to wear personnel dosimeters. Section 8.10.4 of NUREG-1556, Volume 1, Rev. 2 says to provide the following statement: ""We will provide and require the use of individual monitoring devices (dosimetry). All personnel dosimeters that require processing to determine the radiation dose will be processed and evaluated by a NVLAP-approved processor." Please make this statement as your procedure does not state that you will process and get evaluated the monitoring devices with a NVLAP approved processor.

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. 594336. 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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