

From: [Lawyer, Dennis](mailto:vdarling@specializedengineering.com)
To: vdarling@specializedengineering.com
Subject: DIW Group, Inc., Request for Additional Information Concerning Application for a License Renewal, Control 594411, License No. 19-30397-01, Docket No. 03034479
Date: Tuesday, April 04, 2017 12:51:00 PM

Dear Ms. Darling,

This is in reference to your application dated March 23, 2017, requesting for amendment to Nuclear Regulatory Commission License No. 19-30397-01, Docket No. 03034479. In order to continue our review, we need the following additional information:

1. The current application was signed by Mr. David Schultz, President. Currently, our records show that you are the management contact for the NRC. Please state who should be the NRC contact and provide contact information (Telephone number, fax number, email address).
2. In item 5 of your application, you did not state the maximum activity that you wish to be licensed for each line item i through iv. Please state the maximum amount of material for each item that you wish to be licensed. Current protocol of NRC licensing needs different models of devices on different lines.
3. In item 6 of your application, you stated that you wish to be licensed for a Troxler Electronic Laboratories, Inc., model 4600. Model 4600 is not in the sealed source and device registry, nor do you currently have this device authorized on your NRC license. Please provide the manufacturer name and model number as printed in the sealed source and device registry. Please ensure you include the maximum activity per source and total activity you wish to be licensed to possess these devices.
4. In item 7, it appears that you wish to change your Radiation Safety Officer to David S. Schultz. Please provide the contact information for Mr. Schultz (Telephone number, fax number, email address).
5. Section 8.8.1 of NUREG-1556, Volume 1, Rev. 2, "Consolidated Guidance About Materials Licenses Program-Specific Guidance About Portable Gauge Licenses," discusses training for authorized users. It appears that you are submitting a description of a proposed training for authorized users. Appendix C of NUREG-1556, states the acceptable criteria for a training course. The following components of who may give training and what the minimum passing criteria is for your training course did not appear to be present in your procedures.
 - a. Please state the minimum acceptable training and experience for instructors of your training program.
 - b. Please state the passing score for your written test.
6. Section XIII of your procedures discuss inventory requirements. Section 8.10.3 of NUREG-1556, Volume 1, Rev. 2 discusses material receipt and accountability. This section says to make the statement, "We will develop, implement and maintain procedures for ensuring accountability of licensed materials at all times" Your procedures do require six month inventory but transfer to authorized recipient for disposal, however it does not seem to state that you would ensure accountability at all times. Please make the above statement.

7. Section 8.10.4 of NUREG-1556, Volume 1, Rev. 2, discusses dosimetry. It says to make 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." Your procedures in section IV discusses dosimetry. It does not appear that you have stated that the individual monitoring devices will be processed by a NVLAP approved processor. Please state that your dosimetry will be processed by a NVLAP approved processor.
8. Section 8.10.6 of NUREG-1556, Volume 1, Rev. 2, discusses operating, emergency, and security procedures. It states to provide one of the two following statements:
 - a. "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
 - b. "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 submitted procedures do not appear to fully discuss the operating, emergency, and security procedures in the detail described in the NUREG. Please make one of the two above statements.

9. Section 8.10.7 of NUREG-1556, Volume 1. Rev. 2 discusses leak test requirements. It says to make the statement that you will use a leak test sample collection kit supplied by an organization licensed by the NRC or an Agreement State to provide leak test kits and/or sample analysis services to other licensees. Your procedures do not appear to address that the leak test kit is from a NRC or Agreement State licensed facility to provide these services. Please make this statement.
10. Section 8.10.7 of NUREG-1556, Volume 1. Rev. 2 discusses routine maintenance. It does not appear that the submitted procedures cover routine maintenance. It says to make the following statement, "We will implement and maintain procedures for routine maintenance of our gauges according to each manufacturer's written recommendations and instructions." Please make this statement.
11. In your procedures section VII. A., it states when on Federal property to call 800-695-7406 or 800-432-1156. This is repeated in section VIII. Emergency reporting of a licensee to the NRC should be done by calling 301-816-5100. Anyone with a safety concern may call 800-695-7403. The 800-695-7406 number is incorrect. The 800-695-7403 number goes specifically to Region I. Please make updates to

your forms, records, and procedures.

12. In your procedures section XIII, it states the you will maintain inventory records for two years. By current License Condition 15, you are required to maintain inventory records for five years. After the renewal, the requirement will be three years. Please state that you will maintain inventory records as required by the License Condition.

Alternatively, you may check and submit the checklist in Appendix B of NUREG-1556, Volume 1, Rev 2. Please have the management representative sign any correspondence in response to this email. <https://www.nrc.gov/reading-rm/doc-collections/nuregs/staff/sr1556/v1/>

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. . 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. We request a response from you within 30 calendar days from the date of this e-mail.

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.

Dennis Lawyer
U.S. NRC Region 1
Health Physicist
610-337-5366