

**From:** [Reichard, Michael](#)  
**To:** [tadpole@polebrothersimaging.com](mailto:tadpole@polebrothersimaging.com)  
**Subject:** Request for additional information - Pole Brothers Imaging Company, 45-25383-01, 03034342, MC599641  
**Date:** Thursday, June 29, 2017 9:49:00 AM

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License Number: 45-25383-01  
Docket Number: 03034342  
Mail Control Number: 599641

Dear Mr. Hilbert:

This is in reference to your application dated May 19, 2017, requesting to renew NRC License No. 45-25383-01. In order to continue our review, we need the following additional information:

1. When submitting your response, please sign the document.
2. Please provide the following information:
  - a. Please submit an outline of the training to be given to prospective radiographers and radiographer's assistants.
  - b. Please provide a copy of a typical examination and the correct answers to the examination questions.
  - c. Please submit all training program descriptions noted in 10 CFR 34.43, except those training and examination program topics listed under 10 CFR 34.43(g).
  - d. Describe the practical field examination that will be given to prospective radiographers and radiographer's assistants.
  - e. Describe the annual refresher training program, including topics to be covered and how the training will be conducted.
  - f. Submit a description of your program for inspecting the job performance of each radiographer and radiographer's assistant at the intervals not to exceed 6 months, as described in 10 CFR 34.43(e).
3. Please make the following commitments:
  - a. Calibrations will be performed by an NRC or Agreement State licensee that is specifically authorized to perform instrument calibrations.

NOTE: This could include calibrations performed by you under an Agreement State license.
  - b. Physical inventories will be conducted and documented at quarterly intervals (not to exceed 3 months) to account for all sealed sources containing byproduct material and devices containing depleted uranium received and possessed under the license.
  - c. We will comply with the NSTS reporting requirements as described in 10 CFR 20.2207.
  - d. Leak test sample collection and analysis will be performed by an organization authorized by the NRC or an Agreement State to provide leak-testing services to other licensees; or by using a leak-test sample collection kit supplied by an organization licensed by the NRC or an Agreement State to provide leak-test kits and sample analysis services to other licensees and according to the instructions provided in the leak-test sample collection kit.
4. Please make one of the two following commitments:

- a. We will not perform sealed source recovery and will use the services of a person specifically licensed by the NRC or an Agreement State to perform the recovery of our sealed sources.  
OR
  - b. Submit operating and emergency procedures that include instructions for sealed source recovery and specific required training.
5. Please note that the information you provided pertaining to your storage location, which is located in an Agreement State, was not reviewed.

We will continue our review upon receipt of this information. Please email a signed and scanned (pdf) response letter to me at [michael.reichard@nrc.gov](mailto:michael.reichard@nrc.gov) or reply to my attention at:

Michael Reichard  
Mail Control No. 599641  
USNRC, Region I  
Division of Nuclear Materials Safety  
2100 Renaissance Boulevard  
King of Prussia, PA 19406

In order to continue prompt review of your application, we request that you submit your response to this letter within 30 calendar days from the date of this letter.

If Security Related Information is necessary to provide an acceptable response, please mark your entire response Security-Related Information in accordance with 10 CFR 2.390(d)(1) and follow the instructions for withholding in 10 CFR 2.390(b)(1). If you reply by email and your response includes Security Related Information, please encrypt the email and inform me of the password by telephone.

If you have any questions regarding this request for additional information, please contact me at 610-337-6945 or via electronic mail at [michael.reichard@nrc.gov](mailto:michael.reichard@nrc.gov).

Thank you for your cooperation.

Michael Reichard  
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