

**From:** [Lawyer, Dennis](#)  
**To:** [rperch@ecslimited.com](mailto:rperch@ecslimited.com)  
**Subject:** ECS Mid-Atlantic, LLC, Request for Additional Information Concerning Application for a License Renewal, Control No. 599867, Docket No. 03037505, License No. 19-31261-01  
**Date:** Tuesday, July 18, 2017 4:55:00 PM

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Dear Mr. Perch, Sr.,

This is in reference to your application dated June 15, 2017, requesting for License renewal to Nuclear Regulatory Commission License No. 19-31261-01, Docket No. 03037505. We note that you submitted your training program and Radiation Safety Plan. It is recommended that you complete the pages Appendix B pages B-3 through B-7 of NUREG-1556, Volume 1, Revision 2, "Consolidated Guidance About Materials Licenses Program-Specific Guidance About Portable Gauge Licenses," in replacement of the training program and Radiation Safety Plan. Alternately, in order to continue our review, we need the following additional information:

1. Your application did not appear to describe the use or requirement of a Radiation Safety Meter, other than it would be used in an emergency. NUREG-1556, Volume 1, Rev. 2, gives the requirements in section 8.10.2. Please make the statement, "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."
2. Your application did not appear to fully describe material accountability requirements. NUREG-1556, Volume 1, Rev. 2, section 8.10.3, describes the requirements and states to make the following statement, "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." Please make this statement.
3. You have stated that you will monitor personnel but did not state how the dosimeters would be processed. NUREG-1556, Volume 1, Rev. 2, section 8.10.4 describes Occupational dose requirements. It says to provide the following statement, "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.
4. You stated that you would perform leak tests every six months but did not discuss how those leak tests would be counted. Based on your current license, it appears you send these to be counted by a licensed facility. NUREG-1556, Volume 1, Rev. 2, section 8.10.7 describes the leak test requirements and says to provide the following statement, "Leak tests will be performed by an organization licensed 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/or sample analysis services to other licensees and according to the kit supplier's instructions. Records of leak test results will be maintained."

5. Some items in the Radiation Safety Program did not seem to be correct. Please correct or explain the following steps in the program:
- a. Page 3, item 13 does not appear to include emergency information as stated in DOT regulations.
  - b. Page 7, item 3.c. stated: "One system must also prevent the case from being opened." 10 CFR 30.34(i), in part, "Each portable gauge licensee shall use a minimum of two independent physical controls that form tangible barriers to secure portable gauges from unauthorized removal, whenever portable gauges are not under the control and constant surveillance of the licensee." Thus two systems must prevent the case from being opened, which would allow someone to remove the gauge.
  - c. Page 10, Training, Item 3, states that each Radiation Safety Officer (RSO) will attend a training class that meets the requirements of Appendix D of NUREG-1556." The current NUREG-1556, Volume 1, Rev. 2, Appendix D only states typical RSO duties and responsibilities. It does not describe training requirements for the RSO.

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. 599867. 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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