

NRC Form 314 - Certification
of Disposition of Materials

RECEIVED JUL 31 2017

CERTIFICATE OF DISPOSITION OF MATERIALS

PLEASE READ THESE INSTRUCTIONS BEFORE COMPLETING NRC FORM 314.

Subpart E of 10 CFR Part 20 establishes the radiological criteria for license terminations/decommissioning of facilities licensed under 10 CFR Parts 30, 40, 50, 60, 61, 70, and 72, as well as other facilities subject to the Commission's jurisdiction under the Atomic Energy Act of 1954, as amended, and the Energy Reorganization Act of 1974, as amended.

INSTRUCTIONS

Section B, Item 2.

Licensees should describe the specific radioactive material transfer actions. If radioactive wastes were generated in terminating this license, the licensee should describe the disposal actions taken, including the disposition of low-level radioactive waste, mixed waste, greater-than-Class-C waste, and sealed sources.

Section B, Item 2.a.

The information provided concerning the transfer of radioactive material to another licensee should specify the date of the transfer, the name of the licensee recipient, an individual contact name and telephone number for the licensee recipient, and the recipient's NRC or Agreement State license number.

Section B, Item 2.b.

For disposal of radioactive materials, licensees should describe the specific disposal method or procedure (e.g., decay-in-storage). For those cases when radioactive materials are disposed of by a licensed disposal site or by a waste contractor, the licensee should specify the name, address, and telephone number of the licensed disposal site operator or waste contractor.

Section B, Item 2.c.

"Residual radioactivity," as defined in 10 CFR 20.1003, means radioactivity in 'areas' (structures, materials, soils, etc.) remaining as a result of activities (licensed and unlicensed) under the licensee's control from sources used by the licensee, excluding background radiation. ALARA is defined in 10 CFR 20.1003.

FILE CERTIFICATES AS FOLLOWS:

IF YOU ARE LOCATED IN:

ALABAMA, CONNECTICUT, DELAWARE, DISTRICT OF COLUMBIA, FLORIDA, GEORGIA, KENTUCKY, MAINE, MARYLAND, MASSACHUSETTS, NEW HAMPSHIRE, NEW JERSEY, NEW YORK, NORTH CAROLINA, PENNSYLVANIA, PUERTO RICO, RHODE ISLAND, SOUTH CAROLINA, TENNESSEE, VERMONT, VIRGINIA, VIRGIN ISLANDS, OR WEST VIRGINIA, SEND CERTIFICATES TO:

LICENSING ASSISTANT SECTION
NUCLEAR MATERIALS SAFETY BRANCH
U.S. NUCLEAR REGULATORY COMMISSION, REGION I
2100 RENAISSANCE BOULEVARD, SUITE 100
KING OF PRUSSIA, PA 19406-2713

ILLINOIS, INDIANA, IOWA, MICHIGAN, MINNESOTA, MISSOURI, OHIO, OR WISCONSIN, SEND CERTIFICATES TO:

MATERIALS LICENSING SECTION
U.S. NUCLEAR REGULATORY COMMISSION, REGION III
2443 WARRENVILLE ROAD, SUITE 210
LISLE, IL 60532-4352

IF YOU ARE LOCATED IN:

ALASKA, ARIZONA, ARKANSAS, CALIFORNIA, COLORADO, HAWAII, IDAHO, KANSAS, LOUISIANA, MISSISSIPPI, MONTANA, NEBRASKA, NEVADA, NEW MEXICO, NORTH DAKOTA, OKLAHOMA, OREGON, PACIFIC TRUST TERRITORIES, SOUTH DAKOTA, TEXAS, UTAH, WASHINGTON, OR WYOMING, SEND CERTIFICATES TO:

MATERIAL RADIATION PROTECTION SECTION
U. S. NUCLEAR REGULATORY COMMISSION, REGION IV
1600 E. LAMAR BOULEVARD
ARLINGTON, TX 76011-4511



CERTIFICATE OF DISPOSITION OF MATERIALS

Estimated burden per response to comply with this mandatory collection request: 30 minutes. This submittal is used by NRC as part of the basis for its determination that the facility is released for unrestricted use. Send comments regarding burden estimate to the FOIA, Privacy, and Information Collections Branch (T-5 F53), U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001, or by e-mail to Infocollcts.Resource@nrc.gov, and to the Desk Officer, Office of Information and Regulatory Affairs, NEOB-10202, (3150-0028), Office of Management and Budget, Washington, DC 20503. If a means used to impose an information collection does not display a currently valid OMB control number, the NRC may not conduct or sponsor, and a person is not required to respond to, the information collection.

LICENSEE NAME AND ADDRESS

American Consulting, Inc.
7260 Shadeland Station
Indianapolis, IN 46256

LICENSE NUMBER

13-32518-01

DOCKET NUMBER

030-36584

LICENSE EXPIRATION DATE

12/31/2024

A. LICENSE STATUS (Check the appropriate box)

- ☐ This license has expired. ☒ This license has not yet expired; please terminate it.

B. DISPOSAL OF RADIOACTIVE MATERIAL

(Check the appropriate boxes and complete as necessary. If additional space is needed, provide attachments)

The licensee, or any individual executing this certificate on behalf of the licensee, certifies that:

- ☐ 1. No radioactive materials have ever been procured or possessed by the licensee under this license.
- ☒ 2. All activities authorized by this license have ceased, and all radioactive materials procured and/or possessed by the licensee under this license number cited above have been disposed of in the following manner.
- ☒ a. Transfer of radioactive materials to the licensee listed below:
American Consulting, Inc., 2550 Corporate Exchange Drive Suite 3000, Columbus, OH. ODOH License #31210250053
- ☐ b. Disposal of radioactive materials:
- ☐ 1. Directly by the licensee:
- ☐ 2. By licensed disposal site:
- ☐ 3. By waste contractor:
- ☐ c. All radioactive materials have been removed such that any remaining residual radioactivity is within the limits of 10 CFR Part 20, Subpart E, and is ALARA.

C. SURVEYS PERFORMED AND REPORTED

- ☐ 1. A radiation survey was conducted by the licensee. The survey confirms:
- ☐ a. the absence of licensed radioactive materials
- ☐ b. that any remaining residual radioactivity is within the limits of 10 CFR 20, Subpart E, and is ALARA.
- ☐ 2. A copy of the radiation survey results:
- ☐ a. is attached; or ☐ b. is not attached (Provide explanation); or ☐ c. was forwarded to NRC on: _____ Date
- ☒ 3. A radiation survey is not required as only sealed sources were ever possessed under this license, and
- ☐ a. The results of the latest leak test are attached; and/or ☒ b. No leaking sources have ever been identified.

The person to be contacted regarding the information provided on this form:

NAME	TITLE	TELEPHONE (Include Area Code)	E-MAIL ADDRESS
Eric Everett	RSO	317-547-5580	eeverett@structurepoint.com

Mail all future correspondence regarding this license to:

American Consulting, Inc. 7260 Shadeland Station, Indianapolis, IN 46256

C. CERTIFYING OFFICIAL
I CERTIFY UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT

PRINTED NAME AND TITLE

Eric Everett, RSO

SIGNATURE

DATE

7/23/17

WARNING: FALSE STATEMENTS IN THIS CERTIFICATE MAY BE SUBJECT TO CIVIL AND/OR CRIMINAL PENALTIES. NRC REGULATIONS REQUIRE THAT SUBMISSIONS TO THE NRC BE COMPLETE AND ACCURATE IN ALL MATERIAL RESPECT. 18 U.S.C. SECTION 1001 MAKES IT A CRIMINAL OFFENSE TO MAKE A WILLFULLY FALSE STATEMENT OR REPRESENTATION TO ANY DEPARTMENT OR AGENCY OF THE UNITED STATES AS TO ANY MATTER WITHIN ITS JURISDICTION.

Copy of NRC License



UNITED STATES
NUCLEAR REGULATORY COMMISSION

REGION III
2443 WARRENVILLE RD, SUITE 210
LISLE, IL 60532-4352

JUL 13 2015

Eric D. Everett, P.E.
Radiation Safety Officer
American Consulting, Inc.
7260 Shadeland Station
Indianapolis, IN 46256

Dear Mr. Everett:

Enclosed is Amendment No. 3 to your NRC Material License No. 13-32518-01 in accordance with your request. Changes made to your license are printed in **bold** font.

Please review the enclosed document carefully and be sure that you understand all conditions. If there are any errors or questions, please notify the U.S. Nuclear Regulatory Commission, Region III office at (630) 829-9887 so that we can provide appropriate corrections and answers.

You will be periodically inspected by NRC. Failure to conduct your program in accordance with NRC regulations, license conditions, and representations made in your license application and supplemental correspondence with NRC will result in enforcement action against you. This could include issuance of a notice of violation, or imposition of a civil penalty, or an order suspending, modifying or revoking your license as specified in the General Statement of Policy and Procedure for NRC Enforcement Actions. Since serious consequences to employees and the public can result from failure to comply with NRC requirements, prompt and vigorous enforcement action will be taken when dealing with licensees who do not achieve the necessary meticulous attention to detail and the high standard of compliance which NRC expects of its licensees.

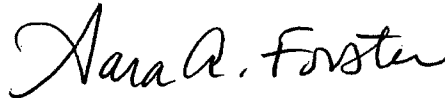
The NRC's Safety Culture Policy Statement became effective in June 2011. While a policy statement and not a regulation, it sets forth the agency's *expectations* for individuals and organizations to establish and maintain a positive safety culture. You can access the policy statement and supporting material that may benefit your organization on NRC's safety culture Web site at <http://www.nrc.gov/about-nrc/regulatory/enforcement/safety-culture.html>. We strongly encourage you to review this material and adapt it to your particular needs in order to develop and maintain a positive safety culture as you engage in NRC-regulated activities.

E. Everett

- 2 -

In accordance with Title 10 of the *Code of Federal Regulations* Section 2.390, a copy of this letter and its enclosure will be available electronically for public inspection in the NRC Public Document Room or from the NRC's Agencywide Documents Access and Management System (ADAMS), accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html>.

Sincerely,

A handwritten signature in black ink that reads "Sara A. Forster". The signature is written in a cursive style with a large, stylized 'S' and 'F'.

Sara A. Forster, M.S.
Health Physicist
Materials Licensing Branch

License No. 13-32518-01
Docket No. 030-36584

Enclosure: Amendment No. 03

MATERIALS LICENSE

Pursuant to the Atomic Energy Act of 1954, as amended, the Energy Reorganization Act of 1974 (Public Law 93-438), and Title 10, Code of Federal Regulations, Chapter I, Parts 30, 31, 32, 33, 34, 35, 36, 37, 39, 40, and 70, and in reliance on statements and representations heretofore made by the licensee, a license is hereby issued authorizing the licensee to receive, acquire, possess, and transfer byproduct, source, and special nuclear material designated below; to use such material for the purpose(s) and at the place(s) designated below; to deliver or transfer such material to persons authorized to receive it in accordance with the regulations of the applicable Part(s). This license shall be deemed to contain the conditions specified in Section 183 of the Atomic Energy Act of 1954, as amended, and is subject to all applicable rules, regulations, and orders of the Nuclear Regulatory Commission now or hereafter in effect and to any conditions specified below.

Licensee		In accordance with application dated July 9, 2014,
1. American Consulting, Inc.		3. License number 13-32518-01 is amended in its entirety to read as follows:
2. 7260 Shadeland Station Indianapolis, IN 46256		4. Expiration date December 31, 2024
		5. Docket No. 030-36584 Reference No.
6. Byproduct, source, and/or special nuclear material	7. Chemical and/or physical form	8. Maximum amount that licensee may possess at any one time under this license
A. Cesium-137	A. Sealed sources registered either with NRC under 10 CFR 32.210 or with an Agreement State and incorporated in a compatible gauging device as specified in Item 9 of this license	A. No single source to exceed the maximum activity specified in the certificate of registration issued by NRC or an Agreement State. Total activity not to exceed 54 millicuries
B. Americium-241	B. Sealed sources registered either with NRC under 10 CFR 32.210 or with an Agreement State and incorporated in a compatible gauging device as specified in Item 9 of this license	B. No single source to exceed the maximum activity specified in the certificate of registration issued by NRC or an Agreement State. Total activity not to exceed 264 millicuries
9. Authorized use:		
A. and B. In Troxler Electronic Laboratories Model 3440 portable gauging devices for measuring physical properties of materials.		

CONDITIONS

10. Licensed material may be used or stored at the licensee's facilities located at 7260 Shadeland Station, Indianapolis, Indiana, and may be used at temporary job sites of the licensee anywhere in the United States where the U.S. Nuclear Regulatory Commission maintains jurisdiction for regulating the use of licensed material.
11. Licensed material shall only be used by, or under the supervision and in the physical presence of individuals who have successfully completed the training described in the letter dated December 3, 2014.
12. **The Radiation Safety Officer (RSO) for this license is Eric D. Everett, P.E.**

**MATERIALS LICENSE
SUPPLEMENTARY SHEET**

License Number

13-32518-01

Docket or Reference Number

030-36584

Amendment No. 03

13. A. Sealed sources shall be tested for leakage and/or contamination at intervals not to exceed the intervals specified in the certificate of registration issued by the U.S. Nuclear Regulatory Commission under 10 CFR 32.210 or by an Agreement State.
- B. In the absence of a certificate from a transferor indicating that a leak test has been made within the intervals specified in the certificate of registration issued by the U.S. Nuclear Regulatory Commission under 10 CFR 32.210 or by an Agreement State, prior to the transfer, a sealed source or detector cell received from another person shall not be put into use until tested and the test results received.
- C. Sealed sources need not be tested if they are in storage and are not being used. However, when they are removed from storage for use or transferred to another person, and have not been tested within the required leak test interval, they shall be tested before use or transfer. No sealed source shall be stored for a period of more than ten years without being tested for leakage and/or contamination.
- D. The leak test shall be capable of detecting the presence of 0.005 microcurie (185 becquerels) of radioactive material on the test sample. If the test reveals the presence of 0.005 microcurie (185 becquerels) or more of removable contamination, a report shall be filed with the U.S. Nuclear Regulatory Commission in accordance with 10 CFR 30.50(c)(2), and the source shall be removed immediately from service and decontaminated, repaired, or disposed of in accordance with Commission regulations.
- E. Tests for leakage and/or contamination shall be performed by persons specifically licensed by the Commission or an Agreement State to perform such services. In addition, the licensee is authorized to collect leak test samples but not perform the analysis; analysis of leak samples must be performed by persons specifically licensed by the Commission or an Agreement State to perform such services.
- F. Records of leak test results shall be kept in units of microcuries and shall be maintained for 3 years.
14. Sealed sources or source rods containing licensed material shall not be opened or sources removed or detached from source rods or gauges by the licensee, except as specifically authorized.
15. The licensee shall conduct a physical inventory every 6 months, or at other interval approved by the U.S. Nuclear Regulatory Commission, to account for all sealed sources and/or devices received and possessed under the license.
16. Except for maintaining labeling as required by 10 CFR Part 20, or 71, the licensee shall obtain authorization from the U.S. Nuclear Regulatory Commission before making any changes in the sealed source, device or source-device combination that would alter the description or specifications as indicated in the respective certificate of registration issued either by the Commission pursuant to 10 CFR 32.210 or by an Agreement State.
17. Each portable nuclear gauge shall have a lock or outer locked container designed to prevent unauthorized or accidental removal of the sealed source from its shielded position. The gauge or its container must be locked when in transport. A minimum of two independent physical controls that form tangible barriers to secure portable gauges from unauthorized removal whenever the portable gauge is not under the control and constant surveillance of the licensee are required.

**MATERIALS LICENSE
SUPPLEMENTARY SHEET**License Number
13-32518-01Docket or Reference Number
030-36584

Amendment No. 03

18. Any cleaning, maintenance, or repair of the gauges that requires detaching the source rod from the gauge shall be performed only by the manufacturer or other persons specifically licensed by the U.S. Nuclear Regulatory Commission or an Agreement State to perform such services.
19. The licensee is authorized to transport licensed material in accordance with the provisions of 10 CFR Part 71, "Packaging and Transportation of Radioactive Material."
20. Except as specifically provided otherwise in this license, the licensee shall conduct its program in accordance with the statements, representations, and procedures contained in the documents, including any enclosures, listed below. The U.S. Nuclear Regulatory Commission's regulations shall govern unless the statements, representations, and procedures in the licensee's application and correspondence are more restrictive than the regulations.

A. Letters dated December 3, 2014, December 18, 2014, and **July 1, 2015**.

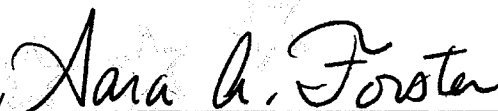


FOR THE U.S. NUCLEAR REGULATORY COMMISSION

Date

JUL 13 2015

By



Sara A. Forster, M.S.
Materials Licensing Branch
Region III

Copy of ODOH License



OHIO DEPARTMENT OF HEALTH

246 North High Street
Columbus, Ohio 43215

614/466-3543
www.odh.ohio.gov

John R. Kasich/Governor

Lance Himes/Director of Health

July 18, 2017

American Consulting, Inc.
Attn: Eric Everett
2550 Corporate Exchange Drive, Suite 300
Columbus, OH 43231

Dear Mr. Everett,

Enclosed is your new State of Ohio Radioactive Materials License Number 31210250053. This license has been prepared in accordance with the information provided in your application. Please review the license to ensure that you understand all of the conditions. If you have any questions or detect any errors, do not hesitate to contact the Bureau of Radiation Protection (BRP) at 614-644-2727.

Your license will expire on 08/01/2022. You must conduct your radioactive material program in accordance with your license, representations made in your license application and the Ohio Administrative Code. In particular, you must:

1. Notify the BRP in writing, within the appropriate time frames, when:
 - a. An authorized user or Radiation Safety Officer discontinues duties under the license or has a name change;
 - b. The licensee's mailing address changes;
 - c. You decide to terminate all activities involving radioactive materials authorized under your license; or
 - d. If you decide not to possess or use the authorized radioactive material.
2. Request to obtain a license amendment before you:
 - a. Receive or use radioactive material not authorized on your license;
 - b. Change Radiation Safety Officer;
 - c. Order radioactive material of a different form or in excess of the amount authorized on your license;
 - d. Add or change areas of use, which involve the use of radioactive materials requiring a written directive;
 - e. Add or change areas or addresses of use identified in the license application or on the license;
 - f. Change ownership of the organization; or
 - g. Permit anyone to work as an authorized user who is not listed on your license.
3. Submit a complete license Renewal Application at least 90 days before the expiration date of your license (180 days for broad-scope licensees).

The BRP will periodically inspect your operations involving licensed materials. Failure to conduct your radioactive material program in accordance with State of Ohio regulations, license conditions and representations made in your license application may result in enforcement actions against you.

The Ohio Department of Health (ODH) has recently adopted a new Safety Culture Policy Statement. While this policy statement is not a regulation, it sets forth the agency's expectations for individuals and organizations to establish and maintain a positive safety culture for regulated programs using radioactive materials and/or radiation-generating equipment in Ohio. You may access the policy statement on the BRP home page of the ODH web-site at:

<http://www.odh.ohio.gov/odhprograms/rp/radprot/radppub1.aspx>. We strongly encourage you to review this material and adapt it to your particular needs in order to develop and maintain a positive safety culture within your organization.

Sincerely,

Stephen James

Stephen James
Supervisor
Bureau of Radiation Protection

OHIO DEPARTMENT OF HEALTH
LICENSE FOR RADIOACTIVE MATERIAL

Pursuant to Chapter 3748 of the Ohio Revised Code, and in reliance on statements and representations made by the licensee, a license is hereby issued authorizing the licensee named herein to receive, acquire, possess, and transfer radioactive material as designated below; to use such material for the purpose(s) and at the place(s) designated below; to deliver or transfer such material to persons authorized to receive it in accordance with the applications of Chapter 3748 of the Ohio Revised Code and all applicable rules promulgated thereunder. This license is subject to all applicable rules, regulations and orders of the Ohio Department of Health now or hereinafter in effect and to any conditions specified below.

LICENSEE 1. American Consulting, Inc. 2. 2550 Corporate Exchange Drive Suite 300 Columbus, Ohio 43231	LICENSE NUMBER 3. 31210250053 EXPIRATION DATE 4. August 1, 2022 FILE NUMBER - ID NUMBER 5. 501563-13930
---	---

6. RADIOACTIVE MATERIAL A. Americium-241:Be B. Cesium-137	7. CHEMICAL AND/OR PHYSICAL FORM A. Sealed source B. Sealed source	8. MAXIMUM QUANTITY THAT LICENSEE MAY POSSESS AT ANY ONE TIME UNDER THIS LICENSE A. No single source to exceed 1.63 GBq (44 mCi), total possession not to exceed 6.52 GBq (176 mCi). B. No single source to exceed 333 MBq (9 mCi), total possession not to exceed 1.33 GBq (36 mCi).
--	---	--

9. **Authorized Use**
 A. and B. (4 gauges) To be used in Troxler Model 3400 series portable gauges for measuring physical properties of materials.

CONDITIONS

10. Licensed material may only be used at the licensee's facilities located at:
 - A. 3080 Corporate Exchange Drive Columbus Ohio 43231; and
 - B. Temporary jobsites within the State of Ohio.
11. The Radiation Safety Officer for this license is: Eric Everett
12. Licensed material shall be used by, or under the supervision of and in the physical presence of, individuals who have satisfactorily completed the device manufacturer's training program for gauge users or equivalent. The licensee shall maintain training records for the individuals who have been designated as authorized users.
13. All sealed sources that are used or obtained shall have been evaluated or approved under the provisions of OAC 3701:1-46-49, or equivalent NRC or Agreement State regulation.
14. The licensee shall conduct a physical inventory every 6 months, or at another interval approved by the Director, to account for all sources and/or devices received and possessed under the license. Records of inventories shall be maintained for at least 3 years from the date of each inventory, and shall include the quantities and kinds of licensed material, manufacturer's name and model numbers, location of the sources and/or devices, and the date of the inventory.
15. Sealed sources shall be tested for leakage and/or contamination in accordance with OAC 3701:1-38-24.
16. Each portable nuclear gauge must be secured with 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, in accordance with OAC 3701:1-40-16(H). The gauge or its container must be locked when in transport, storage, or when not under the direct surveillance of an authorized user.
17. Any cleaning, maintenance, or repair of the gauges that requires detaching the source or source rod from the gauge shall be performed only by the manufacture or other persons specifically licensed by the Director, the NRC, or an Agreement State to perform such services.
18. When performing tests at temporary job sites, the authorized user shall not leave the portable gauge unattended. Upon completion of tests the device shall be locked in the licensee's vehicle or a secure building to prevent unauthorized use, loss or theft.

OHIO DEPARTMENT OF HEALTH LICENSE FOR RADIOACTIVE MATERIALS SUPPLEMENTARY SHEET	Page 2 of 2
	License Number: 31210250053
	File Number - ID Number: 501563-13930
	Amendment No. Initial

19. The licensee may transport licensed material in accordance with the provisions of OAC 3701:1-50.
20. In addition to the possession limits in Item 8, the licensee shall further restrict the possession of sealed source licensed material to quantities below the minimum limit specified in OAC 3701:1-40-17 for establishing decommissioning financial assurance.
21. Except as specifically provided otherwise in this license, the licensee shall conduct its program in accordance with the statements, representations, and procedures contained in the documents, including any enclosures, listed below. The Ohio Department of Health's statutes, rules, and orders shall govern unless statements, representations, and procedures in the licensee's application and correspondence are more restrictive than the regulations.
 - A. Initial application dated May 9, 2016 and email correspondence dated: June 28, 2017.

For the Ohio Department of Health

DATE: 7-12-2017 BY: Gene Phillips, RS
 W. Gene Phillips, MBA, RS
 Chief Bureau of Environmental Health and Radiation Protection
 on behalf of the Director of Health

Invoice for 2018 NRC License

American Structurepoint, Inc.
Attn: Eric Everett
7240 Shadeland Station
Indianapolis, IN 46256

INDIANAPOLIS
IN 460
26 JUL '17
PM 3 L



U.S. POSTAGE PITNEY BOWES

ZIP 46256 \$ 000.88⁰
02 4W
0000342629 JUL 25 2017

Materials Licensing Section
US Nuclear Regulatory Commission, Region III
2443 Warrenville Rd., Ste. 210
Lisle, IL 60532-4352

RECEIVED JUL 31 2017

60532-435260

