



**UNITED STATES  
NUCLEAR REGULATORY COMMISSION**

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

January 17, 2018

Charles Bradshaw  
Radiation Safety Officer  
Hartford Quality Assurance  
20 West 7<sup>th</sup> Street  
New Albany, IN 47150

Dear Mr. Bradshaw:

We have reviewed the renewal application for NRC License No. 13-32671-01 issued to Hartford Quality Assurance. We determined that we will need the following information to complete our review.

- 1) It appears that the licensee name provided in Section 2 of the application (Hartford Quality Assurance, LLC) is different than licensee name currently listed in the license (Hartford Quality Assurance). If there is a change of the licensee name associated with a change of the control of the license, please provide additional information according to NUREG-1556, Volume 15, Revision 1, Appendix E.
- 2) Provide the maximum number of sealed sources that you plan to possess (please consider the current inventory, sources for replacement, and near future purchasing).
- 3) Provide a copy of the delegation of authority for the Radiation Safety Officer (see attached sample)
- 4) Provide the following information for each field station:
  - Describe the storage location(s) and submit a diagram showing where the radiography camera will be stored.
  - Indicate whether or not industrial radiography will be performed at the place of business outside of a field station.
  - If radiography will be performed at a site outside a field station, provide a diagram of the location where industrial radiography may be performed and its surroundings, including a description of adjacent properties.
- 5) Describe how the annual refresher training will be conducted (in classroom, online, etc.)
- 6) You discussed the practical field examinations for radiographer and assistant radiographer and referred to Form 1-RT-7 and Form 1-RT-7A in the application. However, we could not locate those forms in the application. Please provide a copy of Form 1-RT-7 and Form 1-RT-7A.
- 7) Provide a copy of a typical examination for radiographer and assistant radiographer and the correct answers to the examination questions.

- 8) You stated that your survey meters will be calibrated by a licensee with license no. 47-23076-01 (Furmanite America, Inc.) Based on our data, License No. 47-23076-01 was terminated on May 17, 2016. Please provide a statement that your survey instrument will be calibrated by an NRC or Agreement State licensee specifically authorized to perform instrument calibration. Otherwise, you could provide an alternative response as discussed in NUREG-1556, Volume 2, Revision 1, "Instruments".
- 9) Provide a statement that the licensee will comply with NSTS reporting requirements as described in 10 CFR 20.2207.
- 10) In the application, you stated that the licensee will perform the leak test for the sealed sources. However, the discussion was for collecting the leak test samples and sending the samples to other authorized licensee for analyzing. Please provide the following: "Leak tests 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."
- 11) With regard to source retrieval activities, if you would like to perform source retrieval, please provide a copy of the source retrieval training completion certificate. If not, please provide a statement that the licensee 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 its sealed sources. You could provide other response, as you deem appropriate.
- 12) In Section 3, Procedure 4, you stated that the training records for each individual engaged in industrial radiography will be maintained as long as that individual remains employment with the licensee. That statement does not align with 10 CFR 34.79 requirements. Please provide a statement that the licensee will maintain records of training and certification for each radiographer and assistant radiographer in accordance with 10 CFR 34.79.
- 13) Please correct the followings:
  - Application, Item 10, Quarterly Maintenance, No. 1
  - Application, Item 11, Waste Management, No. 2
  - Section 2, Procedure 1, Item 2.0 – Responsibilities
  - Section 2, Procedure 3, Item 3.1a, Item 3.1b and Item 3.2
  - Section 2, Procedure 5, Item 3.0 – General
  - Section 2, Procedure 10, Item 5.3

Please provide the response in writing with an authorized signature and date by February 20, 2018. To facilitate proper correspondences handling in our office, please reference Mail Control No. 600992 in your response. To expedite the licensing process, you could fax your response to 630-515-1078. If you have any questions or require clarification on any of the information stated above, please do not hesitate to contact me at 630-829-9887 or [frank.tran@nrc.gov](mailto:frank.tran@nrc.gov).

In accordance with Title 10 Code of Federal Regulations 2.390 of the U.S. Nuclear Regulatory

Commission's (NRC) "Rules of Practice," 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,

  
Frank P.D. Tran  
Health Physicist  
Materials Licensing Branch

License No. 13-32671-01  
Docket No. 030-37549

Attachment:

1) Delegation of Authority for RSO sample

**Model Delegation of Authority to RSO**

Memo To: Radiation Safety Officer  
From: Chief Executive Officer (or designee)  
Subject: Delegation of Authority

You, \_\_\_\_\_, have been appointed radiation safety officer and are responsible for ensuring the safe and secure use of radiation. You are responsible for managing the Radiation Protection Program, identifying radiation protection problems, initiating, recommending, or providing corrective actions, verifying implementation of corrective actions, stopping unsafe activities, and ensuring compliance with regulations. You are hereby delegated the authority necessary to meet those responsibilities, including prohibiting the use of byproduct material by employees who do not meet the necessary requirements and shutting down operations, when justified, to maintain radiation safety. You are required to notify management if staff does not cooperate and does not address radiation safety issues. In addition, you are free to raise issues with the U.S. Nuclear Regulatory Commission at any time. It is estimated that you will spend \_\_\_\_\_ hours per week conducting radiation protection activities.

\_\_\_\_\_  
Signature of Management Representative

\_\_\_\_\_  
Date

\_\_\_\_\_  
Name

\_\_\_\_\_  
Title

I accept the above responsibilities,

\_\_\_\_\_  
Signature of Radiation Safety Officer

\_\_\_\_\_  
Date

**cc: Affected department heads**