

From: [Lawyer, Dennis](mailto:scutter@qtaeng.com)
To: scutter@qtaeng.com
Subject: Geo-Technology Associates, Inc., Request for Additional Information Concerning Application for a License Renewal, Control 602563, License No. 19-30479-01, Docket No. 03034837
Date: Wednesday, March 21, 2018 7:58:00 AM

Dear Mr. Stephen A. Cutter,

This is in reference to your letter dated February 28, 2018, requesting for renewal to Nuclear Regulatory Commission License No. 19-30479-01, Docket No. 03034837. In order to continue our review, we need the following additional information:

1. The protocol for writing NRC licenses have changed and the CPN models will need to be on a different line item than the Troxler models. Please provide the number of gauges or activity amount you wish to be licensed for CPN models and Troxler models for each isotope.
2. Please provide the telephone number for the New Castle, Delaware facility.
3. In item 7 of your application it appears to be a slight error, in that a reference to NUREG-1556, Volume 2 was made instead of NUREG-1556, Volume 1, Revision 2. Please confirm that any proposed RSO will have successfully completed one of the training courses described in Criteria in the section entitled "Individual(s) Responsible for Radiation Safety Program and Their Training and Experience-Radiation Safety Officer" in NUREG-1556, Volume 1, Revision 2.
4. In item 10.3, you did not include one of the commitments as stated in Appendix B of NUREG-1556, Volume 1, Revision 2. Please state, "We will develop, implement, and maintain procedures for ensuring accountability of licensed materials at all times."
5. In item 10.6, you left out Security Procedures and did not include that procedures are available at each job site in your statement. Please state, "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, Vol. 1, Rev. 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. Alternately, you may state: We will implement and maintain the operating, emergency, and security procedures in Appendix G to NUREG—1556, Vol. 1, Rev. 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. If these statements are not acceptable please submit specific procedures and a statement that they will be available at each job site.
6. In item 10.8, it appears that there was an issue with formatting the statement and the statement appears to be incomplete. Please make the following statement about Non-Routine Maintenance: The gauge manufacturer or other person licensed by the NRC or an Agreement State will perform non-routine maintenance or repair operations that require detaching the source or source rod from the gauge.

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. 602563. 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.

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