From: <u>Wardrobe, Leonardo</u>

To: <u>bcgreene@enviroprobeinc.com</u>

Subject: Request for Additional Information, Enviroprobe Integrated Solutions, Inc. - 602715

Date: Friday, April 06, 2018 2:20:00 PM

EnviroProbe Integrated Solutions, Inc.

License No.: 47-35482-01 Docket No: 03039103 Control No: 602715

Mr. Benjamin C. Greene II:

This refers to your request for a new license dated February 20, 2018. In order to continue our review of your request, the following additional information is needed:

- 1. In your application for a new license, you submitted a completed Appendix B "Suggested Format for Providing Information Requested in Items 5 through 11 of U.S. Nuclear Regulatory Commission Form 313" from NUREG-1556 Volume 1, Revision 1 of the Consolidated Guidance About Materials License Program-Specific Guidance About Portable Gauge Licenses. Please resubmit a completed Appendix B "Suggested Format for Providing Information Requested in Items 5 through 11 of U.S. Nuclear Regulatory Commission Form 313" from NUREG-1556 Volume 1, Revision 2 of the Consolidated Guidance About Materials License Program-Specific Guidance About Portable Gauge Licenses. Please note, in the updated Appendix B, Item 7 & 9, you will need to submit the applicable documentation for these items.
- 2. Please state in writing, by manufacturer and model number, the quantity of portable nuclear gauges that you would like to possess under your license.
- 3. Please state in writing if you would like to have the 963 Canyon Road, Morgantown, WV listed on your license as a place of storage/use.
- 4. In your Radiation Safety Program document, section III, C (b), it should state that "Each portable gauge shall have a minimum of two independent physical controls that form tangible barriers to secure the portable gauge from unauthorized removal, whenever the portable gauge is not under the control and constant surveillance of the authorized user". This is the requirement for security of portable gauges as defined in 10 CFR 30.34(i).
- In your Radiation Safety Program document, section VI, you should add practical training as described in Appendix C from NUREG-1556 Volume 1, Revision 2 of the Consolidated Guidance About Materials License – Program-Specific Guidance About Portable Gauge Licenses.
- 6. In your Radiation Safety Program document, section VII (1), should state that all personnel dosimeters that require processing to determine the radiation dose will be processed and evaluated by a NVLAP-approved processor.
- 7. In your Radiation Safety Program document, section VII (3), you reference Code

Rule 38 under Section 38.21. As a NRC licensee, you are subject to the occupational limits referenced in 10 CFR 20 Subpart C and this should be referenced in you procedure.

- 8. In your Radiation Safety Program document, section VIII (A) (8), see #4 above for security of portable gauges.
- 9. In your Radiation Safety Program document, section VIII (B) (1) the RSO should be notified for any physical damage to the portable gauge.
- 10. In your Radiation Safety Program document, section VIII (B) (2) there are also reporting requirements to the NRC in accordance with 10 CFR 20 Subpart M and this should be included.
- 11. In your Radiation Safety Program document, section IX the title states that all items listed below are to be kept with the gauge at all times. The utilization log book should be kept at your storage location to ensure that the RSO and authorized users can account for where the portable gauge is located.
- 12. In your Radiation Safety Program document, section IX (B), this folder should have important phone numbers (Emergency Response Numbers, RSO number, etc.) in case of an incident (accident, theft, etc.). Remove Code Rule 38 and include a copy of your emergency procedures.
- 13. In your Radiation Safety Program document, section XII (1), per the Sealed Source and Device registry for a Troxler Electronic Laboratories Model 3400 Series portable gauge, this type of portable gauge can be leak checked every 12 months.
- 14. Your reply letter/form 313 must be signed by a person that is authorized by the licensee to make/sign binding/legal/financial commitments for the licensee or the licensee must submit a letter from a person from the licensee who can make/sign binding/legal/financial commitments for the licensee that authorizes Mr. Benjamin C. Greene II to make/sign binding/legal/financial commitments for the licensee.

If you have any questions about this request for additional information, you may reference NUREG-1556 Volume 1, Revision 2, Consolidated Guidance About Materials License – Program-Specific Guidance About Portable Gauge Licenses at this location: https://www.nrc.gov/docs/ML1617/ML16175A375.pdf or call me at the below number.

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 request.

Leo Wardrobe
Health Physicist

Nuclear Regulatory Commission, Region I

Division of Nuclear Materials Safety, Commercial, Industrial, R&D, and Academic Branch 2100 Renaissance Boulevard, Suite 100 King of Prussia, PA 19406-2713 Office: 610-337-5171

Fax: 610-337-5269

leonardo.wardrobe@nrc.gov

http://www.nrc.gov/