

**From:** [Lawyer, Dennis](#)  
**To:** [jfarris@thebeltgroup.com](mailto:jfarris@thebeltgroup.com)  
**Cc:** [Pfungsten, Jonathan](#)  
**Subject:** Belt Paving, Inc., Request for Additional Information Concerning Application for a License Renewal, Control 609375  
**Date:** Wednesday, August 29, 2018 10:05:00 AM

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Dear Mr. Farris,

This is in reference to your application dated July 12, 2018, requesting a renewal to Nuclear Regulatory Commission License No. 47-25444-01, Docket No. 030-34786. In order to continue our review, we need the following additional information:

1. Your application contains a change in mailing address from Route 2, Box 145D, Keyser, West Virginia 26726 to P.O. Box 1210, Cumberland, MD 21501. Please confirm your desire to make this the new official mailing address associated with your license.
2. Your application does not explicitly state whether or not you are seeking permission to utilize the portable gauge(s) at temporary jobsites. NUREG-1556, Volume 1, Rev. 2, "Consolidated Guidance About Materials Licenses, Program-Specific Guidance About Portable Gauge Licenses," Section 8.3 requests this information. If so, please state that you are seeking permission to utilize the portable gauges at "temporary jobsites anywhere in the U.S. where the NRC maintains jurisdiction."
3. Your application does not state the maximum number of gauges you are requesting permission to own and operate as specified in NUREG 1556, Volume 1, Rev. 2, Appendix B, Items 5 and 6. Please provide the maximum overall activity for each radionuclide or maximum number of each type of portable gauge being requested.
4. Your application states that the Cs-137 requested will be used to measure physical properties of materials, however you do not explicitly state the proposed uses of the Am-241 sources as requested in NUREG 1556, Volume 1, Rev. 2, Appendix B, Items 5 and 6. Additionally, while the Troxler 4640 and 4640B model gauges are listed for Cs-137, these Troxler models do not utilize an Am-241 source. Please specify the proposed uses of the requested Am-241 sources.
5. Your application states that the Cs-137 requested Model# HEG 0058. The Registry of Radioactive Sealed Sources and Devices Safety Evaluation of Device associated with the devices requested (Troxler 4640 and 4640B model gauges) include Model# HEG-137. Additionally, your current license specifies Model# HEG-137. Please clarify the appropriate SSD model number requested.
6. Your application does not include information on why you are removing the Troxler gauges model 3241 and the 3400 series on your current license. Please explain whether this was intentional and, if so, provide documentation of the transfer or disposal of these model gauges, as well as the results of the final leak tests for these devices.
7. Your application does not specify that authorized users will have successfully completed one of the training courses described in the "Criteria" part of NUREG

1556, Volume 1, Rev. 2, Appendix C. Your application references “training for individuals frequenting restricted areas” but commits to Appendix D, which covers duties and responsibilities of the Radiation Safety Officer. In accordance with NUREG 1556, Volume 1, Rev. 2, Appendix B, Item 8, please state that “Before using licensed materials, authorized users will have successfully completed one of the training courses described in the “Criteria” part of the section titled, “Training for Individuals Working in or Frequenting Restricted Areas” in NUREG 1556, Volume 1, Rev. 2”.

8. Your application does not contain a facility diagram for each permanent storage location as requested in NUREG 1556, Volume 1, Appendix B, Item 9. Additionally, you have added a location of storage and use that is not currently contained in your license. The facility diagram for each permanent portable gauge storage location should include information on the use of adjacent areas (including above and below), and information relevant to public dose and security. Please provide a facility diagram for each permanent portable gauge storage location. Please include on the diagram the use of adjacent areas (including above and below), and information relevant to public dose and security as discussed in Sections 8.10.5, “Public Dose,” and 8.10.6, “Operating, Emergency, and Security Procedures,” respectively, in NUREG 1556, Volume 1, Rev. 2.
9. Your application does not state that you will or have developed, implemented, and maintained procedures for ensuring accountability of licensed materials at all times as requested in NUREG 1556, Volume 1, Appendix B, Item 10.3. As appropriate to your situation, please explicitly state “We have/will develop, implement, and maintain procedures for ensuring accountability of licensed materials at all times.”
10. Your application does not submit or contain a commitment to develop, implement, and maintain the operating and security procedures contained in Appendix G to NUREG-1556, Volume 1 as requested by NUREG 1556, Volume 1, Appendix B, Item 10.6. Please either state that “We will develop, implement, and maintain the operating and security procedures contained in Appendix G to NUREG-1556, Vol. 1, Rev. 2” and that “Copies of these procedures will be provided to all gauge users and will be available at each jobsite.” Alternatively, you may provide a copy of your operating and security procedures meeting the criteria contained in Section 8.10.6 to NUREG-1556, Vol. 1, Rev. 2, and commit to continue to implement and maintain the procedures in accordance with NUREG-1556, Volume 1. While the emergency procedures were provided, the others were not submitted or committed to in your renewal application.
11. Your application states that maintenance shall be performed by the manufacturer or other persons specifically licensed by the US NRC or an Agreement State to perform such services as specified in NUREG 1556, Volume 1, Rev. 2, Appendix B, Item 10.8. If you intend to perform routine cleaning and lubrication, please state “We will implement and maintain procedures for routine maintenance of our gauges according to each manufacturer’s written recommendations and instructions.”

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. 609375. 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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