

**From:** [Lawyer, Dennis](mailto:Lawyer.Dennis)  
**To:** [Accutechtesting@yahoo.com](mailto:Accutechtesting@yahoo.com)  
**Subject:** Accu-Tech Testing Services, LLC, Request for Additional Information Concerning Application for a New License, Control 611392  
**Date:** Monday, March 04, 2019 2:37:00 PM

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Dear Mr. Kai Smith,

This is in reference to your application dated February 1, 2019, requesting for a new license, Nuclear Regulatory Commission License No. 55-35530-01, Docket No. 03039158. In order to continue our review, we need the following additional information:

1. Since the physical address given is difficult to see on-line, please provide the coordinates for your storage location.
2. Seamen Nuclear Model C-200 and C-300 gauges may need to be listed separately on the license. Please identify how many gauges you wish to be licensed for each gauge model.
3. There are two sealed source and device active registries for Seaman model C-200. Please state the maximum activity of Ra-226 you wish to be licensed for the C-200.
4. Your application has provided your training certificates for training programs taken on-line. Section 8.7 of NUREG-1556, Volume 1, Rev. 2, "Consolidated Guidance About Materials Licenses Program-Specific Guidance About Portable Gauge Licenses," states to provide documentation demonstrating that the proposed RSO and Authorized User is qualified by training and experience. It does not appear that you have any experience in using gauges. Please provide documentation that you have experience with using the gauge.
5. You did not provide information about your facility, NUREG-1556, Volume 1, Rev. 2, Section 8.9, states, "Provide a facility diagram for each permanent portable gauge storage location. 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, Vol. 1, Rev. 2, "Consolidated Guidance About Materials Licenses: Program-Specific Guidance About Portable Gauge Licenses." Please provide this information.
6. Your application did not provide a statement that you will maintain accountability procedure for material. NUREG-1556, Volume 1, Rev. 2, Section 8.9, says to provide the following statement, "We will develop, implement and maintain procedures for ensuring accountability of licensed materials at all times." Please make this statement.
7. Your application discussed Operating and Emergency procedures but did not include security procedures as stated in section 8.10.6 in NUREG-1556, Vol. 1, Rev. 2. Please state, "We will implement and maintain the operating, emergency, and security procedures in Appendix G to NUREG-1556, Volume 1, Revision 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.” Or you can 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, Volume 1, Revision 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.” Please make one of these statements.

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. 611392. 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.

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