

From: [Cassata, James](#)
To: [Somerville, Mark O](#)
Subject: RE: 1. Questions About License Location; 2. Request for Additional Information Concerning License Renewal
Date: Tuesday, June 11, 2019 12:35:00 PM
Attachments:

Importance: High

Mail Control Number: 611138
Docket Number: 030-37850
License Number: 20-31340-01
License Reviewer: James R. Cassata

Mark,

1. **Questions about the License Location:** The change of address for license records does not require a license amendment. Given all the information in paragraphs A and B below, the location for your license that you choose to list on Block 2 is up to you.

- A. License condition 17 states, "The licensee shall maintain records of information important to decommissioning each temporary job site at the applicable job site pursuant to 10 CFR Parts 30.35(g), 40.36(f), and 10:25(g). The records shall be made available to the customer upon request. At the completion of activities at a temporary job site, the licensee shall transfer these records to the customer for retention.
- B. I don't believe you have any sealed sources used for calibration or as check sources on your NRC license where they would be permanently used or stored. Your license states, "Licensed material may be used only at temporary job sites of the licensee anywhere in the United States where the U.S. Nuclear Regulatory Commission maintains jurisdiction for regulating the use of licensed material, including areas of exclusive Federal jurisdiction within Agreement States."

Therefore, the location for your license that you choose to list on Block 2 is up to you. If you do change the address that is listed in Block 2 of the NRC form 313, then an amendment will be required.

Although the location of record storage is not specified in a license condition, please keep in mind that records must also be made available for NRC inspectors upon request.

██████████ was not specifically mentioned on the license so no need for an amendment in that case either.

2. **Request for Additional Information (RAI) on Renewal:** On a different topic, I reviewed your renewal application dated November 5, 2018, and it is lacking a great deal of information. You should use NUREG 1556 Vol 18, Revision 1, to assist you in determining the detail required for a renewal application. Remember a renewal application is essentially like starting over and you must submit all the information as if it were a new license. In order to continue our review, we need the additional information as soon as possible. Since you have been designated as the Certifying Official you can

sign and state the reply to the RAI, this makes it very convenient for you. For expedience, please reply by pdf attachment to an email sent to R1DNMSMail.Resource@nrc.gov with a Cc to me. In the mail list me as the reference as **License Reviewer: James R. Cassata** and also put your mail control number for this action as **Mail Control No [611138]**. Please encrypt and password protect your pdf if any security or proprietary related information is included, and provide me with the password verbally on a phone call. Please call me if you have questions about this and also see the post script (PS) information at the bottom of my email discussing 10 CFR 2.390. You should be able to submit your reply without including security or proprietary related information.

R1DNMSMail.Resource@nrc.gov

Reference – **[James R. Cassata]**

Mail Control No. **[611138]**

Notes:

Appendix B of NUREG 1556 Vol 18, Revision 1, is especially helpful as it has a suggested format for providing information requested in items 5 through 11 of NRC Form 313.

Your license falls under a “High-Risk Activity”, as, “T. decontamination and decommissioning services (see NUREG–1757, Volume 1).”

Here are the links to NUREG 1556 Vol 18 and NUREG-1757, Vol 1, Revision 2:

<https://www.nrc.gov/docs/ML1724/ML17242A055.pdf>

<https://www.nrc.gov/docs/ML0630/ML063000243.pdf>

Finally, I have attached your tie down conditions from your current license to assist you in understanding the level of detail required with a renewal application. The attached document for tie down condition E is non-public so I have encrypted and password protected it. I will call you to provide the password. The other attachments are all publically available on our ADAMS website to they are not encrypted and password protected.

Be call me as soon as you can to discuss the renewal application.

Thank you,

Jim

PS: In order to continue prompt review of your application, we request that you submit your response to this email as soon as possible but not later that 10-days upon receipt.

An electronic version of the NRC’s regulations is available on the NRC Web Site at: www.nrc.gov . Additional information regarding use of radioactive materials may be obtained on the NRC Web Site at: <http://www.nrc.gov/materials/miau/mat-toolkits.html> . This site also provides the link to the toolbox for updated information on the revised regulations for naturally-occurring and accelerator-produced radioactive materials (NARM).

In accordance with 10 CFR 2.390 of the NRC’s “Rules of Practice,” a copy of this email correspondence will be available electronically for public inspection in the NRC Public Document Room or from the NRC’s document system (ADAMS). ADAMS is accessible

from the NRC Web Site at: <http://www.nrc.gov/reading-rm/adams.html> . Please be aware that you may request that certain portions of your submittal to NRC be withheld from public disclosure as proprietary information. To do this, you must execute an affidavit as specified in 10 CFR 2.390. You must list all portions that you wish to be held proprietary, along with your reasoning as to why that is appropriate. While it is allowable, please refrain from submitting proprietary information in support of a license unless necessary. Keep in mind that all NRC licenses are considered to be in the public domain, and therefore may be viewed by any member of the public who requests to see them.

If you have any questions regarding this request for additional information, please contact me at my Office Phone at 610-337-5303 or via electronic mail at james.cassata@nrc.gov .

Thank you for your cooperation.

James R. Cassata, Ph.D., CHP
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From: Somerville, Mark O [mailto:mark.somerville@aptim.com]
Sent: Friday, June 07, 2019 4:00 PM
To: Cassata, James <James.Cassata@nrc.gov>
Subject: [External_Sender] RE: Certifying Official

Dr. Cassata,

I have an update and a question.

The update: APTIM laid off several people this week and one was [REDACTED] in the Canton MA office.

She was actually QA but used to be in my group and still handled records.

The records are still in Canton and there are still contact people there.

The question: If I move the records to a different facility, I know I'll need to process an amendment, but, both likely offices are in region 4 (Denver, Colorado and Concord California).

Does that represent an issue to the NRC?

As I mentioned, everything is the same for now but I don't want you to be blindsided. I just heard from the Canton office today so I wanted to update you in a timely manner.

Hope all is well.

Mark

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From: Cassata, James <James.Cassata@nrc.gov>

Sent: Wednesday, March 6, 2019 3:35 PM

To: Somerville, Mark O <mark.somerville@aptim.com>

Subject: Automatic reply: Certifying Offical

I am out of the office and will be returning on 3/8/2019. If required, I will reply to your e-mail when I return. For immediate assistance please call the Administrative Assistant at 610-337-5274.

Thank you.

Jim Cassata