

From: Kennedy, Erin
To: Kennedy, Erin
Subject: FW: RE: Request for Additional Information
Date: Friday, August 02, 2019 1:22:29 PM

From: Kennedy, Erin <Erin.Kennedy@nrc.gov>
Sent: Wednesday, June 26, 2019 5:32 PM
To: Kevin Matthews <kmatthews@patrioteng.com>
Subject: Request for Additional Information

Good Afternoon Mr. Matthews,

Thank you for taking the time to discuss the renewal of your NRC materials license with me this afternoon. As we discussed on the telephone, I will need some additional information to complete your license renewal. Please provide a signed and dated response no later than Wednesday, July 10, 2019.

1. In your renewal application you did not include all the addresses of the permanent storage locations which are currently listed on your license. In your response, please provide the street address where licensed material will be used or stored for **each facility listed on your license**. In addition, please provide a detailed facility diagram for each of these locations. The diagram should be drawn to scale and include the use of adjacent areas (including above and below), and information relevant to public dose and security. Additional information regarding public dose and security is discussed in Sections 8.10.5, "Public Dose," and 8.10.6, "Operating, Emergency, and Security Procedures," to NUREG 1556, Vol. 1, Rev. 2.

If you would like to remove a location from your license that is no longer in use, please provide the following:

- A specific request to remove the location from your license
 - a list of the gauges (including the serial numbers) that have been stored at this location
 - a discussion of the historical leak test data (have you ever had a leaking gauge at the location?)
 - a statement that all of the radioactive material has been removed from the location
- 2) In your renewal application you did not request to use your gauges at temporary job sites. In your response in please indicate that you intend to use the portable gauges at temporary jobsites.
 - 3) In our telephone conversation you stated that you did not wish to preform analysis of your own leak tests. In your response please provide a statement that:

"Leak tests will be performed at intervals approved by the NRC or an Agreement State and specified in the SSD registration certificate. Leak tests will be performed by an organization licensed by the NRC or an Agreement State to provide leak

testing services to other licensees; or by using a leak test sample collection kit supplied by an organization licensed by the NRC or an Agreement State to provide leak test kits and/or sample analysis services to other licensees and according to the kit supplier's instructions. Records of leak test results will be maintained."

As we discussed, it is our current policy that only the primary RSO is named on an NRC license unless unusual circumstances apply. The primary RSO may delegate certain day-to-day tasks of the radiation protection program to other responsible individuals. For example, a licensee with multiple permanent locations of use or use at temporary jobsites may appoint "site RSOs," who assist the RSO and are responsible for the day-to-day activities at these locations. Such "site RSOs" do not need to meet all RSO qualifications; however, they should be qualified, experienced authorized users who have adequate knowledge of the activities to which they are assigned. The primary RSO named on the license maintains ultimate responsibility for implementation and oversight of the Radiation Safety Program.

Please let me know if you have any questions about anything that we discussed today.

Thank You,

Erin Kennedy

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