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EMERY SAPP & SONS, INC.

January 10, 2020
From: Kyle Frye
2301 I-70 Drive NW
Columbia, Mo 65202
816-262-0170

To: Erin Kennedy
U.S NRC Region III
2443 Warrenville Road
Suite 210
Lisle, Illinois 60532-4352

Reference: NRC License 24-32751-01

Erin:

Please find the attached Appendix B fillable form for items 5 through 11 of NRC form 313. This submittal is for the renewal of the above referenced NRC License. I am not making any changes at this time from my last license amendment which was amendment 2.

Please feel free to contact me if you have any questions. Thank you.

Sincerely,

Kyle Frye
Quality Control Manager

APPENDIX B

**SUGGESTED FORMAT FOR PROVIDING INFORMATION REQUESTED IN
ITEMS 5 THROUGH 11 OF
U.S. NUCLEAR REGULATORY COMMISSION FORM 313**

**Suggested Format for Providing Information Requested in
Items 5 through 11 of
U.S. Nuclear Regulatory Commission Form 313**

Items 5 and 6: Materials To Be Possessed and Proposed Uses

Yes	No	Radionuclide	Manufacturer or Distributor Model No.	Quantity	Use as Listed on SSD Registration Certificate	Specify Other Uses Not Listed on SSD Registration Certificate
		Cesium-137	Gauge manufacturer (or distributor) and model number:	Specify activity per source and number of gauges requested.	Yes <input type="checkbox"/> Specific description of the gauge use:	<input type="checkbox"/> Not applicable <hr/> <input type="checkbox"/> Uses are: <hr/> (Submit safety analysis supporting safe use.)
		Americium- 241	Gauge manufacturer (or distributor) and model number:	Specify activity per source and number of gauges requested.	Yes <input type="checkbox"/> Specific description of the gauge use:	<input type="checkbox"/> Not applicable <hr/> <input type="checkbox"/> Uses are: <hr/> (Submit safety analysis supporting safe use.)

Yes	No	Radionuclide	Manufacturer or Distributor Model No.	Quantity	Use as Listed on SSD Registration Certificate	Specify Other Uses Not Listed on SSD Registration Certificate
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Californium-252	Gauge manufacturer (or distributor) and model number:	Specify activity per source and number of gauges requested. —	Yes <input type="checkbox"/> Specific description of the gauge use:	<input type="checkbox"/> Not applicable <input type="checkbox"/> Uses are: (Submit safety analysis supporting safe use.)
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Radium-226	Gauge manufacturer (or distributor) and model number:	Specify activity per source and number of gauges requested.	Yes <input type="checkbox"/> Specific description of the gauge use:	<input type="checkbox"/> Not applicable <input type="checkbox"/> Uses are: (Submit safety analysis supporting safe use.)
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Other Isotope (Specify):	Gauge manufacturer (or distributor) and model number:	Specify activity per source and number of gauges requested.	Yes <input type="checkbox"/> Specific description of the gauge use:	<input type="checkbox"/> Not applicable <input type="checkbox"/> Uses are: (Submit safety analysis supporting safe use.)
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Is financial assurance required? If yes, submit evidence of financial assurance.				

**Items 7 through 11: Training and Experience,
Facilities and Equipment, Radiation Safety Program,
and Waste Disposal**

Item No. and Title	Suggested Response	Yes	Alternative Procedures Attached
7. INDIVIDUAL(S) RESPONSIBLE FOR RADIATION SAFETY PROGRAM AND THEIR TRAINING AND EXPERIENCE—RADIATION SAFETY OFFICER Name: <u>Kyle Frye</u>	Documentation demonstrating the proposed radiation safety officer's training and experience (e.g., certificate of completion of the RSO's course and/or the authorized user's course).	Submit applicable documentation.	
8. TRAINING FOR INDIVIDUALS WORKING IN OR FREQUENTING RESTRICTED AREAS	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, Vol. 1, Rev. 2, "Consolidated Guidance About Materials Licenses: Program-Specific Guidance About Portable Gauge Licenses."	<input checked="checked" type="checkbox"/>	<input type="checkbox"/>
9. FACILITIES AND EQUIPMENT	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"	Submit applicable documentation.	

Item No. and Title	Suggested Response	Yes	Alternative Procedures Attached
10.1 RADIATION SAFETY PROGRAM—AUDIT PROGRAM	The applicant should not submit its audit program to the NRC for review during the licensing phase. The audit program will be reviewed during NRC inspections.	Need Not Be Submitted with Application	
10.2 RADIATION SAFETY PROGRAM—RADIATION MONITORING INSTRUMENTS	We will either possess and use, or have access to and use, a radiation survey meter that meets the criteria in the section titled, "Radiation Safety Program—Radiation Monitoring Instruments" in NUREG-1556, Vol. 1, Rev. 2, "Consolidated Guidance About Materials Licenses: Program-Specific Guidance About Portable Gauge Licenses," in the event of an incident.	<input checked="" type="checkbox"/>	<input type="checkbox"/>
10.3 RADIATION SAFETY PROGRAM—MATERIAL RECEIPT AND ACCOUNTABILITY	Physical inventories will be conducted every 6 months or at other intervals approved by the NRC to account for all sealed sources and devices received and possessed under the license. AND We will develop, implement, and maintain procedures for ensuring accountability of licensed materials at all times.	<input checked="" type="checkbox"/>	<input type="checkbox"/>
10.4 RADIATION SAFETY PROGRAM—OCCUPATIONAL DOSE	We will maintain, for inspection by the NRC, documentation demonstrating that unmonitored individuals are not likely to receive a radiation dose in excess of the limits in 10 CFR 20.1502(a).	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	OR We will provide and require the use of individual monitoring devices (dosimetry). All personnel dosimeters that require processing to determine the radiation dose will be processed and evaluated by a NVLAP-approved processor.	<input type="checkbox"/>	

Item No. and Title	Suggested Response	Yes	Alternative Procedures Attached
10.5 RADIATION SAFETY PROGRAM—PUBLIC DOSE	The applicant is <i>not</i> required to submit a response to the public dose section in a license application. This matter will be examined during NRC inspections.	Need Not Be Submitted with Application	
10.6 RADIATION SAFETY PROGRAM—OPERATING, EMERGENCY, AND SECURITY PROCEDURES	<p>We will implement and maintain the operating, emergency, and security procedures in Appendix G to NUREG-1556, Vol. 1, Rev. 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.</p> <p style="text-align: center;">OR</p> <p>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, Vol. 1, Rev. 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.</p>	<div data-bbox="1105 516 1154 558"><input checked="" type="checkbox"/></div> <div data-bbox="1105 915 1154 957"><input type="checkbox"/></div>	<div data-bbox="1243 516 1292 558"><input type="checkbox"/></div> For this item, checking this box indicates that alternative procedures will be provided as part of the application and that these procedures will be provided to all gauge users and will be available at each jobsite.

Item No. and Title	Suggested Response	Yes	Alternative Procedures Attached
10.8 RADIATION SAFETY PROGRAM—MAINTENANCE	<i>Routine Cleaning and Lubrication</i> We will implement and maintain procedures for routine maintenance of our gauges according to each manufacturer's written recommendations and instructions.	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	<i>Nonroutine Maintenance</i> The gauge manufacturer or other person licensed by the NRC or an Agreement State will perform nonroutine maintenance or repair operations that require detaching the source or source rod from the gauge.	<input checked="" type="checkbox"/>	<input type="checkbox"/> The information listed in Appendix F of this NUREG supporting a request to perform nonroutine maintenance in house is attached.
10.9 RADIATION SAFETY PROGRAM—TRANSPORTATION	The applicant is <i>not</i> required to submit a response about transportation during the licensing process. The NRC will review this issue during inspection.	Need Not Be Submitted with Application	
11. WASTE MANAGEMENT—GAUGE DISPOSAL AND TRANSFER	The applicant is <i>not</i> required to submit a response about waste management during the licensing process; however, the licensee should establish and include gauge transfer and waste disposal procedures in its radiation safety program.	Need Not Be Submitted with Application	

Song, Taehoon

From: Kennedy, Erin
Sent: Wednesday, January 15, 2020 12:56 PM
To: Song, Taehoon; Pavon, Sandy
Cc: Tomczak, Tammy
Subject: FW: Re: Re: Additional information needed for renewal of your NRC materials license
Attachments: NRC License Cover Appendix Form.pdf; 1556 Vol. 1, Rev. 2 Appendix B Form Filled Out.pdf

Good Afternoon,

Will you please add the attached document to ADAMS

Licensee: Emery Sapp & Sons, Inc.

Lic. No. 24-32751-01
Doc No. 030-38051
CN 613755

Thank you,

Erin

From: Kyle Frye <kyle.frye@emerysapp.com>
Sent: Monday, January 13, 2020 10:39 AM
To: Kennedy, Erin <Erin.Kennedy@nrc.gov>
Subject: [External_Sender] Re: Re: Additional information needed for renewal of your NRC materials license

Sorry about that.

Thought about that later the other day and then it slipped my mind again. Let's try this one. Thanks

On Mon, Jan 13, 2020 at 10:36 AM Kennedy, Erin <Erin.Kennedy@nrc.gov> wrote:

Good morning Mr. Frye,

Could you please sign the attached cover letter?

Thank you,

Erin

From: Kyle Frye <kyle.frye@emerysapp.com>

Sent: Friday, January 10, 2020 7:33 AM

To: Kennedy, Erin <Erin.Kennedy@nrc.gov>

Subject: [External_Sender] Re: Additional information needed for renewal of your NRC materials license

Erin,

Please see attached in reference to our license renewal. Please let me know if I didn't fill out Appendix B properly and will make the needed corrections immediately and get it back to you.

Thank you.

On Tue, Dec 17, 2019 at 9:03 AM Kennedy, Erin <Erin.Kennedy@nrc.gov> wrote:

Good Moring Mr. Frye,

Thank you for taking the time to discuss the renewal of your NRC Materials License with me this morning. As we discussed I will need some additional information to complete my review of your renewal request specifically, the information provided in your renewal references outdated guidance documents. For the convenience and streamlined handling of portable gauge applications, you may use Appendix B, "Suggested Format for Providing Information Requested in Items 5 through 11 of NRC Form 313," to NUREG 1556 Vol.1, Rev. 2 to provide this information. I have attached a fillable PDF copy of this checklist to this email. If you choose to use this checklist, please note that I will need the following information:

For Items 5 and 6 provide:

- Each radionuclide and maximum activity of each source per gauge model, and confirmation that the activity per source and maximum activity per gauge will not exceed the maximum activity listed in the approved certificate of registration issued by the NRC or by an Agreement State.
- Manufacturer (or distributor) and model number for each type of gauge.
- Maximum number of gauges to be possessed and used under the license, by manufacturer and model number.
- Purpose for which the gauges will be used, such as "to measure physical properties of materials," and confirmation that all gauges will be used as listed in accordance with the applicable and approved certificate of registration issued by the NRC or by an Agreement State.

For Item 10.8 please note:

- There are two checkboxes in this section, one for Routine Cleaning and Operation and one for Nonroutine Maintenance. You will need to make a selection for each.

You have already submitted the required supporting documentation, and I do not need you to resubmit that information. For your convenience, you may provide the checklist as a PDF attachment to an email by Friday, January 3, 2019. Please included a signed and dated cover letter.

Let me know if you have any additional questions.

Thank you,

Erin Kennedy

U.S. Nuclear Regulatory Commission, Region III

Health Physicist- Materials Licensing

Email: erin.kennedy@nrc.gov

Office: 630-829-9876

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QUALITY CONTROL MANAGER

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