From:	Steven Constas
To:	Wardrobe, Leonardo
Cc:	Steven Constas
Subject:	[External_Sender] RE: Request for Additional Information, License Renewal 617425
Date:	Wednesday, January 15, 2020 3:23:32 PM
Attachments:	Constas-Troxler & HAZMAT Cert.pdf HAZMAT (Expires 03-05-2022).pdf Radiation Safety Officer (RSO) Certificate.pdf

---

Good Afternoon Leo,

Answers in RED

1. Your current license (amendment 5) authorizes 12 portable gauges and your renewal request is asking authorization to possess 4 gauges. Please confirm the quantity of portable gauges you would like authorized on your license.
    a. Please leave the quantity of gauges at 12
2. Amendment 5 of your license lists as the RSO John Turner. Please provide copies of training certificates for Steven M. Constas, who is named as the new RSO for your license renewal.
    a. Please see attached (Original Troxler Cert. / Updated HAZMAT / RSO Certificate
3. Please state that you 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.
    a. We possess Radiation Survey Meters that meet the criteria
4. Please state 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. OR We will implement the model leak test program published in Appendix I of NUREG–1556, Volume 1, Revision 2, “Consolidated Guidance About Materials Licenses: Program- Specific Guidance About Portable Gauge Licenses.” Records of leak tests will be maintained.

    a. Leak Tests are performed every 6 months. Test/Results are completed by an NRC Certified Company
4. Please state that you will implement and maintain procedures for routine maintenance of our gauges according to each manufacturer’s written recommendations and instructions.
    a. Yes, routine maintenance in performed annually
5. Please state 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.
    a. Yes, nonroutine maintenance in performed by NRC and/or Agreement Certified Companies

Please contact me if this is not enough

Steve

Steven M. Constas
John Turner Consulting, Inc.
Phone l 603-817-2744

From: Wardrobe, Leonardo <Leonardo.Wardrobe@nrc.gov>
Sent: Wednesday, January 15, 2020 2:46 PM
To: Steven Constas <sconstas@consultjtc.com>
Subject: Request for Additional Information, License Renewal 617425

License No.: 28-31397-01
Docket No: 03038231
Control No: 617425

Mr. Constas:

This refers to your request to renew your license dated December 2, 2019. In order to continue our review of your request, the following additional information is needed:

1. Your current license (amendment 5) authorizes 12 portable gauges and your renewal request is asking authorization to possess 4 gauges. Please confirm the quantity of portable gauges you would like authorized on your license.
2. Amendment 5 of your license lists as the RSO John Turner. Please provide copies of training certificates for Steven M. Constas, who is named as the new RSO for your license renewal.
3. Please state that you 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.
4. Please state 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. OR

We will implement the model leak test program published in Appendix I of NUREG–1556, Volume 1, Revision 2, “Consolidated Guidance About Materials Licenses:

Program- Specific Guidance About Portable Gauge Licenses." Records of leak tests will be maintained.

5. Please state that you will implement and maintain procedures for routine maintenance of our gauges according to each manufacturer's written recommendations and instructions.
6. Please state 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.

If you have any questions about the renewal request you may call me at the below number or you can review NUREG–1556, Volume 1, Revision 2, "Consolidated Guidance About Materials Licenses: Program- Specific Guidance About Portable Gauge Licenses" located at the following link: NRC: Consolidated Guidance About Materials Licenses: Program-Specific Guidance About Portable Gauge Licenses, Final Report (NUREG-1556, Volume 1, Revison 2).

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 license renewal request.

Leo Wardrobe

Health Physicist
Nuclear Regulatory Commission, Region I
Division of Nuclear Materials Safety,
Commercial, Industrial, R&D, and Academic Branch
2100 Renaissance Boulevard, Suite 100
King of Prussia, PA 19406-2713
Office: 610-337-5171
Fax: 610-337-5269

leonardo.wardrobe@nrc.gov

http://www.nrc.gov/

APNGA Portable Nuclear Gauge Safety & U.S. D.O.T. Hazmat Certification Class

Certificate of Completion to:

Steven Constas

HAZMAT refresher training is required within 3 years after today's date:

March 31, 2016

This course covers training criteria of NUREG 1556, The Agreement States, and 49 CFR 172, Subpart H.

The Company RSO completes the training requirements by familiarizing the employee with:

- State specific regulations including introduction to the state regulatory website
- The company radiation safety program, specifically gauge safety operating and emergency procedures
- A tour of storage area with emphasis on security, documents and postings
- Loading, security and transporting gauges in company vehicles
- Hands-on training with the gauge and methods in use by the company
- Introduction to gauge safety content on gauge manufacturer website
- Certificate covers both Gauge Safety and USDOT HAZMAT requirements

The acknowledgement and signature of the RSO/Official makes the training and certificate relevant and valid.

John Turner Consulting, Inc.
Company Name

Signature of RSO

Director of APNGA

American Portable Nuclear Gauge Association
P.O. Box 423, Emmitsburg, MD 21727 • www.apnga.com

4gAT7pyMBm

George E. Marshall - Director
240-888-6426

U.S. D.O.T. HAZMAT CERTIFICATION
Refresher Training for Portable Nuclear Gauges

Certificate of Completion to:

Steven Constas

Training must be renewed within three years from today's date:

March 5, 2019

This course satisfies the training requirements of 49 CFR 172, Subpart H, including:

- General Awareness/Familiarization
- Function Specific Training
- Safety Training
- Security Awareness
- Driver Training

The organization RSO/Official must certify that the employee has been properly trained and tested per the requirements of 49 CFR 172, Subpart H. The acknowledgement and signature of the RSO/Official makes the training and certificate relevant and valid.

John Turner Consulting, Inc.	John D. Turner	
Company Name	Company RSO/Official (print)	Signature of RSO/Official

American Portable Nuclear Gauge Association
P.O. Box 423, Emmitsburg, MD 21727 • www.apnga.com

cYRHWnfEoN

George E. Marshall - Director
240-888-6426

APNGA
Certificate of Achievement

This confirms that

Steven Constas

Has successfully completed the APNGA Portable Nuclear Gauge

Radiation Safety Officer Class

on this day

July 17, 2016

American Portable Nuclear Gauge Association
P.O. Box 423, Emmitsburg, MD 21727 • www.apnga.com

George E. Marshall - Director
240-888-6426

WbnNT0RbE0