



**UNITED STATES
NUCLEAR REGULATORY COMMISSION**
REGION I
2100 RENAISSANCE BLVD.
KING OF PRUSSIA, PA 19406-2713

January 22, 2020

Trent Smith, President
Jefferson, Brenner & Smith, Inc.
dba Southern Consulting
1208 Hwy 47 East
Dickson, TN 37055

**SUBJECT: JEFFERSON, BRENNER & SMITH, INC., DBA SOUTHERN CONSULTING,
REQUEST FOR ADDITIONAL INFORMATION, MAIL CONTROL NO. 617583**

Dear Mr. Smith:

This letter is in reference to your application dated December 10, 2019, requesting to renew NRC License No. 41-25501-01. Additional information is needed in order to continue our review of your request. All item numbers referenced below correspond to Appendix B of NUREG-1556, Volume 1, Revision 2, "Program-Specific Guidance About Portable Gauge Licenses," which was revised in June 2016, and can be located here: <https://www.nrc.gov/reading-rm/doc-collections/nureqs/staff/sr1556/v1/>.

While some of the items below are referenced in your Radiation Safety Program manual, we request that the commitments be made separate from your program document. Please provide the following information:

1. Item 3 – Your current license authorizes materials be used or stored at your facilities located at Fort Campbell, Kentucky, however your renewal application does not list this location. Please confirm whether you are seeking continued authorization for materials to be used or stored at your facilities located at Fort Campbell, Kentucky.
2. Item 3 – Your current license authorizes materials to be used at your temporary job sites anywhere in the United States where the U.S. Nuclear Regulatory Commission maintains jurisdiction for regulating the use of licensed material. However, your renewal application does not request this authorization. Please confirm that you are requesting authorization to use licensed material at temporary job sites anywhere in the United States where the U.S. Nuclear Regulatory Commission maintains jurisdiction for regulating the use of licensed material.
3. Items 5 and 6 – Please confirm that you are requesting continued authorization to possess the following makes and models of portable gauge devices:
 - a. Humboldt Scientific, Inc., Model 5001 Series
 - b. CPN International Model MC Series
 - c. InstroTek, Inc., Model 3500 Xplorer

4. Item 7 – Please provide documentation demonstrating the radiation safety officer’s training and experience (e.g., certificate of completion of an RSO’s course and/or an authorized portable gauge user’s course)
5. Item 8 – Please confirm the following: “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.’”
6. Item 9 – Please provide a facility diagram for all permanent authorized locations of storage in NRC jurisdiction. 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.’”

If you are not requesting authorization for any permanent locations of use and storage in NRC jurisdiction, please state that this item is not applicable.

7. Item 10.2 – Please update your commitment concerning radiation monitoring instruments to the following: “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.’”
8. Item 10.3 – Please state both of the following:
 - a. “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
 - b. “We will develop, implement, and maintain procedures for ensuring accountability of licensed materials at all times.”
9. Item 10.4 – Please state either of the following:
 - a. “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).” OR
 - b. “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.”
10. Item 10.6 – Please state either of the following:
 - a. “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.” OR

- b. “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.
11. Item 10.7 – Please state the following: “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.”
12. Item 10.8 – Please commit to both of the following
- a. “We will implement and maintain procedures for routine maintenance of our gauges according to each manufacturer’s written recommendations and instructions.” AND,
 - b. “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.”

We will continue our review upon receipt of this information. Please reply to my attention at:

Jonathan Pfingsten
Mail Control No. 617583
USNRC, Region I
Division of Nuclear Materials Safety
2100 Renaissance Boulevard
King of Prussia, PA 19406

Or

Jonathan.Pfingsten@nrc.gov
Mail Control No. 617583

In order to continue prompt review of your application, we request that you submit your response to this letter within 30 calendar days from the date of this letter.

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 letter 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 610-337-5170 or via electronic mail at Jonathan.Pfingsten@nrc.gov.

Thank you for your cooperation.

Sincerely,

Jonathan Pfingsten, Health Physicist
Commercial, Industrial, R&D
and Academic Branch
Division of Nuclear Materials Safety
Region I

License No. 41-25501-01
Docket No. 030-35281
Mail Control No. 617583

JEFFERSON, BRENNER & SMITH, INC., DBA SOUTHERN CONSULTING, REQUEST FOR ADDITIONAL INFORMATION, MAIL CONTROL NO. 617583 DATED JANUARY 22, 2020

DOCUMENT NAME: G:\WBL Documents\WBL License RAIL41-25501-01.617583.RAI.docx

SUNSI Review Complete: Jonathan Pfingsten

After declaring this document "An Official Agency Record" it will be released to the Public.

To receive a copy of this document, indicate in the box: "C" = Copy w/o attach/encl "E" = Copy w/ attach/encl "N" = No copy

OFFICE	RI:DNMS	N						
NAME	JPfingsten (JBP)							
DATE	1/22/2020							

OFFICIAL RECORD COPY