From:	Reichard, Michael
To:	Ayala, Juan; DeBoer, Briana
Subject:	FW: RE: RAI to Aerosol Monitoring & Analysis, Inc. Mail Control No. 618074
Date:	Monday, March 23, 2020 12:32:12 PM
Attachments:	Request for Additional Information Mail Control No. 618074; NRC License No. 19-31402-01 .pdf

FYI

Michael Reichard
Health Physicist
US Nuclear Regulatory Commission
Region I
Office: 610-337-6945
Cell: 610-420-5338

From: Andrew Washington <awashington@amaconsulting.com>
Sent: Tuesday, March 17, 2020 3:17 PM
To: Reichard, Michael <Michael.Reichard@nrc.gov>
Cc: Gary Urban <garyu@amaconsulting.com>
Subject: [External_Sender] RE: RAI to Aerosol Monitoring & Analysis, Inc. Mail Control No. 618074

Mr. Reichard,

Attached is AMA's response to the requested information. All points have been addressed. If you have any additional requests, please feel free to contact us.

Thanks,

Andrew Washington, CIH
Project Manager
Aerosol Monitoring & Analysis, Inc.
1331 Ashton Road
Hanover, MD 21076
Phone: (410) 684 3327
Fax: (410) 684 3384
http://www.amaconsulting.com

From: Reichard, Michael <Michael.Reichard@nrc.gov>
Sent: Monday, March 16, 2020 3:47 PM
To: gurban@amaconsulting.com; Andrew Washington <awashington@amaconsulting.com>
Cc: Ayala, Juan <Juan.Ayala@nrc.gov>; DeBoer, Briana <Briana.DeBoer@nrc.gov>; Ullrich, Elizabeth <Elizabeth.Ullrich@nrc.gov>
Subject: RAI to Aerosol Monitoring & Analysis, Inc. Mail Control No. 618074

SUBJECT: AEROSOL MONITORING & ANALYSIS, INC., REQUEST FOR ADDITIONAL INFORMATION, MAIL CONTROL NO. 618074

Dear Mr. Urban,

This is in reference to your letter dated February 3, 2020, requesting to renew NRC License No. 19-31402-01. In order to continue our review, we need the following additional information:

1. In accordance with NUREG 1556, Volume 7, Revision 1, "Program-Specific Guidance About Academic, Research and Development, and Other Licenses of Limited Scope Including Electron Capture Devices and X-Ray Fluorescence Analyzers," Appendix C, Item 10.3, "Material Receipt and Accountability," if the devices will be used at temporary job sites, please confirm that procedures will be developed and implemented to address sign-out of devices for use in the field, control and security of the device in the field, and use of the device to ensure protection of members of the public.

We will continue our review upon receipt of this information. Please respond with a letter, signed by a principal of the company. It can be signed, scanned, and emailed; or mailed. Please reply to my attention at:

Michael.Reichard@nrc.gov

Or

Michael Reichard
Mail Control No. 618074
USNRC, Region I
Division of Nuclear Materials Safety
2100 Renaissance Boulevard
King of Prussia, PA 19406

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 form 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) 337-6945 or via electronic mail at Michael.Reichard@nrc.gov.

Thank you for your cooperation.

Sincerely,

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

Aerosol Monitoring & Analysis, Inc.
Environmental Consultants

March 17, 2020

Michael Reichard
Mail Control No. 618074
USNRC, Region I
Division of Nuclear Materials Safety
2100 Renaissance Boulevard
King of Prussia, PA 19406

RE: Aerosol Monitoring & Analysis, Inc. (AMA) Response to the USNRC Request for Additional Information Mail Control No. 618074; NRC License No. 19-31402-01

Dear Mr. Reichard:

In reference to the USNRC's request for additional information regarding Appendix C, Item 10.3 "Material Receipt and Accountability", AMA offers the following response. The response is based upon AMA's standard operating procedures within our Radiation Safety Program, Section 6 – General Safety Guidelines and Section 7 – Storage/Transportation of the XRF.

Every time the XRF is used at a temporary jobsite or within the office for training purposes, the XRF is signed out by a properly trained and licensed AMA employee. Within the sign-out log, the AMA employee must include the day and time the XRF is signed-out of the office lockbox, the address of the temporary jobsite, the model number of the XRF being used, and the day and time the XRF is returned to the office lockbox. When used locally, the XRF must be returned to the office lockbox at the end of each day.

When the XRF is being used at a temporary jobsite, AMA's Radiation Safety Program includes the following procedures for control and security in the field as well as protection of members of the public.

1. Do not place your hand on the opposite side of a door, wall, or other component, while engaging the XRF unit. When the need to use both hands prevents the operator from holding the device by its handle, the device should be placed on the ground or some flat surface. Under no circumstances should the device be rested or cupped against other parts of the body such as under the arm or on a leg. Similarly, the device should never be carried against the body in a pocket or pouch.

2. When taking a reading on a door, always position the door to be completely closed or fully open, and make sure no one is on the opposite side.

3. When taking readings on interior walls be certain no one is on the opposite side of the wall.

4. Never point an XRF at anyone.

5. Do not use other portions of your body (e.g., shoulder, knee, etc.) to help steady the XRF.

6. Never leave an XRF unattended. The device shall be in your possession and control at all times.

7. When the XRF is not in use, lock it in your vehicle and keep it out-of-sight or store it in another secured location such as a locked room or closet at the job site if such a secured location is available. If stored within the car, the XRF must be in the trunk of the automobile, and be blocked and braced (e.g., with a cord or strap, etc.). Where storage in a trunk is not possible, the XRF must be covered from view. Use a cable lock to provide a tangible barrier to connect the locked XRF case to an available/suitable fixed component inside a vehicle.

8. If an XRF is missing, notify your supervisor immediately.

9. Do not drop the device.

If you need additional information, please feel free to contact us.

Sincerely,

Gary L. Urban, CHMM
Vice President, Consulting Services