



**UNITED STATES  
NUCLEAR REGULATORY COMMISSION**

REGION III  
2443 WARRENVILLE RD. SUITE 210  
LISLE, IL 60532-4352

June 1, 2020

Brandon Comer, P.E.  
Radiation Safety Officer  
T&M Associates  
201 N. Illinois St., 16<sup>th</sup> Floor – South Tower  
Indianapolis, IN 46204

Dear Mr. Comer:

This refers to the letter dated March 12, 2020, signed by Timothy C. Kinsella, CPG / Senior Vice President, and the letter dated May 8, 2020, signed by Bradley S. Hartz, P.E., Regional Client Services Manager. Upon review, we identified an area requiring additional or clarifying information.

The NRC's guidance document for your proposed type of license, which we will be referring to below as "the guidance", is NUREG-1556, Volume 1, Rev. 2, dated June 2016, "Consolidated Guidance About Materials Licenses, Program – Specific Guidance About Portable Gauge Licenses." This guidance is available on the NRC Web site at:  
<https://www.nrc.gov/docs/ML1617/ML16175A375.pdf>

Section 8.10.3 of the guidance states that licensees must maintain records of receipt, transfer, and disposal of gauges and conduct physical inventories every 6 months (or at other intervals justified by the applicant and approved by the NRC) to account for all sealed sources

While your application indicated that you would maintain records of receipt, transfer, and disposal of gauges, there was no commitment regarding the performance of physical inventories to account for all sealed sources.

Please confirm that you will perform physical inventories every 6 months to account for all sealed sources. If you are proposing to conduct the physical interval at another interval other than 6 months, please identify the proposed interval and include justification.

Within 7 days of the date of this letter (by close of business on June 8, 2020) please provide only one response to the items below. Contact me if an alternate response timeframe is required.

Please only send us one complete, written, currently dated and legibly, physically signed (by an appropriate senior management official) or digitally signed correspondence document, such as either an NRC Form 313 or a business-style letter containing the same information as an NRC Form 313a.

Please ensure that only one correspondence letter is used that shows both the date and the signature of the senior management official, in contrast to the two separate, incomplete correspondence letters initiating this request. Please ensure that the requested information is answered completely and accurately.

Please do not send multiple copies of responses and please do not submit any information that is identical to what you have already sent us unless we direct you to do so. If you resubmit such information for the sake of adding context and other details to enhance its meaning, that is acceptable.

Normally we would ask that you not email a PDF document to us, and transmit a faxed version, and/or send a hard copy by mail. Only one copy transmitted in only one of these ways is usually most appropriate to prevent administrative processing errors.

However, since NRC is currently under mandatory telework, you should fax a complete response to us and also email a PDF version to us at [jason.kelly@nrc.gov](mailto:jason.kelly@nrc.gov) and [colleen.casey@nrc.gov](mailto:colleen.casey@nrc.gov).

Please address your written response to my attention as "additional information to control number 618328," to facilitate proper handling in our offices.

Please also schedule a telephone call with me and my colleague, Colleen Casey, to discuss our requests for additional information ("RFAI") above. It is best that you not submit a written response until we discuss the items in this RFAI letter first.

Arranging the call by email in advance is preferable. My email address is [Jason.Kelly@nrc.gov](mailto:Jason.Kelly@nrc.gov) and Ms. Casey's email address is [Colleen.Casey@nrc.gov](mailto:Colleen.Casey@nrc.gov).

My telephone number is (630) 829-9737 and Ms. Casey's telephone number is (630) 829-9841.

A telephone discussion of these items is expected to serve to clarify the information required by our regulations so that your response will be complete and accurate.

In addition, please be reminded that 10 CFR 30.9(a) requires: "(a) Information provided to the Commission by an applicant for a license or by a licensee or information required by statute or by the Commission's regulations, orders, or license conditions to be maintained by the applicant or the licensee shall be complete and accurate in all material respects."

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 Agencywide Documents Access and Management System (ADAMS), accessible from the NRC Web site at <https://www.nrc.gov/reading-rm/adams.html>.

Sincerely,

Jason M. Kelly, M.P.H.  
Materials Licensing Branch

License No. 13-35589-01  
Docket No. 030-39222  
Control No. 618328