

March 9, 1984

LICENSE NO. - - -  
DOCKET NO. 030-20971  
CONTROL NO. 16831

Sechan Limestone Industries  
ATTN: Marvin Kirshner  
Vice President-Operations  
R.D. #1  
Portersville, PA 16051

Gentlemen:

This letter is in response to your application, dated January 23, 1984 for a byproduct material license. Additional information is needed to support your application. To assist you in providing this information, we have enclosed a copy of the guide, "A guide for Preparation of Byproduct Material Applications for the Use of Sealed Sources in Portable and Semiportable Gauging Devices". You should refer to this guide and provide additional information in the following areas:

1. Although you have provided a qualified radiation protection officer (RPO), we will need an outline of the RPO's exact duties and responsibilities. An outline of typical duties and responsibilities of the RPO is given in Item 5 of the enclosed guide.
2. Please give a description of the means of storage of gauges or devices at your address, regional office, etc., when gauges and devices are not in actual use by the individuals listed in the application. Gauges must be stored in such a manner as to ensure against unauthorized removal or unauthorized use as required by Section 20.207 of Title 10, Code of Federal Regulations, Part 20. A simple annotated sketch or sketches of the storage area or areas, closet(s), etc. showing the relationship to actively occupied areas should be submitted.
3. The procedures for leak testing of the sealed sources should be submitted. If the supplier of the devices containing the sealed sources will perform leak tests of the sealed source in the applicant's facility, it is only necessary for you to state this

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and to specify the frequency of the leak tests. If the RPO will perform leak tests of the sealed source and forward to the device manufacturer to be analyzed, it is only necessary for you to state this. You should include the frequency of the leak test, the name of the supplier and the model number of the leak test kit.

4. We are not sure who will be performing the leak test analysis. If you are or plan to conduct the analysis in-house, please:

- (a) Specify the manufacturer's name and model number of instruments to be used in the analysis.
- (b) Specify the manufacturer's name, model number and accuracy of the calibration source(s) used to calibrate your instruments, and the authority for NRC or an Agreement State to possess and use these sources.
- (c) Describe the method of analysis.

If this is to be performed by an individual or company other than the supplier, please provide the number of the service license from NRC. If the individual or company is in an Agreement State, you should submit a copy of the license from the Agreement State.

5. Please provide written instructions to your workers which will cover safety measures to be used in transporting the devices in the applicant's vehicle (for example, fully secured within the transportation vehicle and away from the passenger compartment). Transportation activities must be carried out in accordance with the requirements of 10 CFR Part 71 and Department of Transportation regulations.

Additional information needs to be submitted which will demonstrate that you have means of preventing unauthorized access, use or removal of the gauges during use at temporary job sites. Your written instructions to the workers should state that individual users are never to leave gauges unattended.

6. Please provide written instructions to the workers concerning means of preventing unauthorized use or removal of gauges from the designated place(s) of storage at permanent locations and at temporary job sites.
7. Your written instructions to the workers should contain information concerning emergency procedures to be followed in

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case of accidents involving damage or loss of the gauges or devices, including the names and telephone numbers of the individual(s) within the applicant's organization which should be notified and who would, in turn, notify the local police, State personnel, and the NRC.

8. Please provide information concerning your specific instructions to the users informing them that any maintenance on the gauges involving dismantling, removal of source holder(s), etc., must not be performed by the user and must only be performed by the manufacturer of the device, unless the applicant has specifically requested authority for performing maintenance in the application (See last paragraph, page 10 of the enclosed guide).

We will continue our review of your application upon receipt of this information. Please reply in duplicate and refer to Control No. 16831.

Sincerely,

Original Signed By  
John E. Glenn, Ph.D.

John E. Glenn, Ph.D., Chief  
Nuclear Materials Section B  
Division of Engineering and  
Technical Programs

Enclosures:

1. A guide for the Preparation of Byproduct  
Material Applications for the Use of Sealed  
Sources in Portable and Semiportable Gauging  
Devices.

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