

From: [Alldredge, Casey](#)
To: ben.vance@libertygeotech.com
Subject: Application for NRC Materials License
Date: Thursday, July 23, 2020 4:15:00 PM
Attachments: [NUREG-1556 Volume 1 Revision 2 Appendix B.pdf](#)

Good afternoon Mr. Vance,

I am reviewing your application, dated June 15, 2020, for an NRC license for Liberty Geotech. I have reviewed the information provided and I have a few follow up questions:

1. I noted that the storage location that you listed in the application is in Washington, an Agreement State. Does Liberty Geotech have a State of Washington license? If so, please provide a copy.
2. Do you intend to store and use gauges at temporary job sites? If so, please include that information in Box 3 of the NRC Form 313.
3. Under Item 5, what kind and how many of each type of nuclear gauge does Liberty Geotech need authorization for?
4. See the attached Appendix B to NUREG 1556 Volume 1, Rev 2 "Consolidated Guidance About Materials Licenses, Program Specific Guidance About Portable Gauge Licenses." Please check the boxes that reflect the information that your provided in your June 15, 2020 application.

Please provide the above information with a signed and dated letter on company letterhead. You can provide this information as an attachment to an email or via mail.

If you have any questions, please don't hesitate to let me know.

Thanks,

Casey Alldredge
Health Physicist
Materials Licensing and Decommissioning Branch
Region IV, USNRC

**Suggested Format for Providing Information Requested in
Items 5 through 11 of
U.S. Nuclear Regulatory Commission Form 313**

Items 5 and 6: Materials To Be Possessed and Proposed Uses

Yes	No	Radionuclide	Manufacturer or Distributor Model No.	Quantity	Use as Listed on SSD Registration Certificate	Specify Other Uses Not Listed on SSD Registration Certificate
		Cesium-137	Gauge manufacturer (or distributor) and model number: _____	Specify activity per source and number of gauges requested. _____ _____ _____	Yes <input type="checkbox"/> Specific description of the gauge use: _____ _____ _____ _____ _____	<input type="checkbox"/> Not applicable _____ <input type="checkbox"/> Uses are: _____ (Submit safety analysis supporting safe use.)
		Americium-241	Gauge manufacturer (or distributor) and model number: _____	Specify activity per source and number of gauges requested. _____ _____ _____	Yes <input type="checkbox"/> Specific description of the gauge use: _____ _____ _____ _____	<input type="checkbox"/> Not applicable _____ <input type="checkbox"/> Uses are: _____ (Submit safety analysis supporting safe use.)

Yes	No	Radionuclide	Manufacturer or Distributor Model No.	Quantity	Use as Listed on SSD Registration Certificate	Specify Other Uses Not Listed on SSD Registration Certificate
		Californium-252	Gauge manufacturer (or distributor) and model number: _____ _____	Specify activity per source and number of gauges requested. _____ _____ _____	Yes <input type="checkbox"/> Specific description of the gauge use: _____ _____ _____ _____	<input type="checkbox"/> Not applicable _____ <input type="checkbox"/> Uses are: _____ (Submit safety analysis supporting safe use.)
		Radium-226	Gauge manufacturer (or distributor) and model number: _____ _____	Specify activity per source and number of gauges requested. _____ _____ _____	Yes <input type="checkbox"/> Specific description of the gauge use: _____ _____ _____	<input type="checkbox"/> Not applicable _____ <input type="checkbox"/> Uses are: _____ (Submit safety analysis supporting safe use.)
		Other Isotope (Specify):	Gauge manufacturer (or distributor) and model number: _____ _____	Specify activity per source and number of gauges requested. _____ _____ _____	Yes <input type="checkbox"/> Specific description of the gauge use: _____ _____ _____	<input type="checkbox"/> Not applicable _____ <input type="checkbox"/> Uses are: _____ (Submit safety analysis supporting safe use.)
		Is financial assurance required? If yes, submit evidence of financial assurance.				

**Items 7 through 11: Training and Experience,
Facilities and Equipment, Radiation Safety Program,
and Waste Disposal**

Item No. and Title	Suggested Response	Yes	Alternative Procedures Attached
<p>7. INDIVIDUAL(S) RESPONSIBLE FOR RADIATION SAFETY PROGRAM AND THEIR TRAINING AND EXPERIENCE— RADIATION SAFETY OFFICER</p> <p>Name: _____</p>	<p>Documentation demonstrating the proposed radiation safety officer's training and experience (e.g., certificate of completion of the RSO's course and/or the authorized user's course).</p>	<p>Submit applicable documentation.</p>	
<p>8. TRAINING FOR INDIVIDUALS WORKING IN OR FREQUENTING RESTRICTED AREAS</p>	<p>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."</p>	<input type="checkbox"/>	<input type="checkbox"/>
<p>9. FACILITIES AND EQUIPMENT</p>	<p>Provide a facility diagram for each permanent portable gauge storage location. 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"</p>	<p>Submit applicable documentation.</p>	

Item No. and Title	Suggested Response	Yes	Alternative Procedures Attached
10.1 RADIATION SAFETY PROGRAM—AUDIT PROGRAM	The applicant should not submit its audit program to the NRC for review during the licensing phase. The audit program will be reviewed during NRC inspections.	Need Not Be Submitted with Application	
10.2 RADIATION SAFETY PROGRAM—RADIATION MONITORING INSTRUMENTS	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," in the event of an incident.	<input type="checkbox"/>	<input type="checkbox"/>
10.3 RADIATION SAFETY PROGRAM—MATERIAL RECEIPT AND ACCOUNTABILITY	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 We will develop, implement, and maintain procedures for ensuring accountability of licensed materials at all times.	<input type="checkbox"/>	<input type="checkbox"/>
10.4 RADIATION SAFETY PROGRAM—OCCUPATIONAL DOSE	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 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.	<input type="checkbox"/> <input type="checkbox"/>	<input type="checkbox"/>

Item No. and Title	Suggested Response	Yes	Alternative Procedures Attached
10.5 RADIATION SAFETY PROGRAM—PUBLIC DOSE	The applicant is <i>not</i> required to submit a response to the public dose section in a license application. This matter will be examined during NRC inspections.	Need Not Be Submitted with Application	
10.6 RADIATION SAFETY PROGRAM—OPERATING, EMERGENCY, AND SECURITY PROCEDURES	<p>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.</p> <p>OR</p> <p>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.</p>	<input type="checkbox"/> <input type="checkbox"/>	<input type="checkbox"/> For this item, checking this box indicates that alternative procedures will be provided as part of the application and that these procedures will be provided to all gauge users and will be available at each jobsite.

Item No. and Title	Suggested Response	Yes	Alternative Procedures Attached
<p>10.7 RADIATION SAFETY PROGRAM—LEAK TEST</p>	<p>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.</p> <p style="text-align: center;">OR</p> <p>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.</p>	<p style="text-align: center;"><input type="checkbox"/></p> <p style="text-align: center;"><input type="checkbox"/></p>	<p><input type="checkbox"/> For this item, checking this box indicates that alternative equipment and/or procedures will be provided as part of the application and that records of leak tests will be maintained.</p>

Item No. and Title	Suggested Response	Yes	Alternative Procedures Attached
10.8 RADIATION SAFETY PROGRAM— MAINTENANCE	<p><i>Routine Cleaning and Lubrication</i> We will implement and maintain procedures for routine maintenance of our gauges according to each manufacturer's written recommendations and instructions.</p> <p><i>Nonroutine Maintenance</i> 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.</p>	<input type="checkbox"/> <input type="checkbox"/>	<input type="checkbox"/> <input type="checkbox"/> The information listed in Appendix F of this NUREG supporting a request to perform nonroutine maintenance in house is attached.
10.9 RADIATION SAFETY PROGRAM— TRANSPORTATION	<p>The applicant is <i>not</i> required to submit a response about transportation during the licensing process. The NRC will review this issue during inspection.</p>	<p>Need Not Be Submitted with Application</p>	
11. WASTE MANAGEMENT— GAUGE DISPOSAL AND TRANSFER	<p>The applicant is <i>not</i> required to submit a response about waste management during the licensing process; however, the licensee should establish and include gauge transfer and waste disposal procedures in its radiation safety program.</p>	<p>Need Not Be Submitted with Application</p>	