



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION IV
1600 E. LAMAR BLVD
ARLINGTON TX 76011-4511

November 19, 2020

Mr. Michael A. Price
Radiation Safety Officer
Metals Testing Services, Inc.
P.O. Box 3606
Williamsport, PA 17701

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION

Dear Mr. Price:

The Nuclear Regulatory Commission (NRC) has completed the technical review of the renewal application dated September 10, 2020 of NRC license number 37-29406-02 submitted by you, and the supplemental information provided in email dated October 28, 2020. This review was conducted following the NRC licensing guidance established in NUREG-1556, Volume 2, Revision 1, dated February 2016, and the following deficiencies were identified. Please provide a written response within 30 days of receipt of this letter providing corrections to the deficiencies as indicated below.

1. The following commitment was left unchecked in the license renewal application. Provide the following commitment.
 - A. "Pursuant to 10 CFR 30.35(g), we shall maintain records important to decommissioning and transfer these records to an NRC or Agreement State licensee before licensed activities are transferred or assigned, in accordance with 10 CFR 30.34(b). Furthermore, pursuant to 10 CFR 30.51(f), prior to license termination, we shall forward the records required by 10 CFR 30.35(g) to the appropriate NRC regional office."
2. The renewal applicant requested authorization for lay-barge radiography but a specific operating and emergency procedure for lay-barge radiography as required by 10 CFR 34.41(c) was not provided. Appendix D of NUREG-1556, Volume 2, Revision 1, provides specific safety elements that need to be addressed in a procedure for conducting lay-barge radiography.
 - A. Provide a specific operating and emergency procedure for conducting lay-barge radiography following the guidance in Appendix D of NUREG-1556, Volume 2, Revision 1.
3. The following information was not provided in the license renewal application.
 - A. Demonstrate that the RSO has sufficient independence and direct communication with responsible management officials by providing a copy of an organizational chart, by position, demonstrating day-to-day oversight and coordination with management in radiation safety activities.

4. The following information was not provided in the license renewal application.
 - A. Provide a copy of a typical examination and the correct answers to the examination questions.
 - B. Provide copies of Exhibits J and K of the Radiation Safety Manual.
5. The following information was not provided in the license renewal application.
 - A. Make a request to conduct radiography work 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 including areas of exclusive Federal jurisdiction within Agreement States.
6. In page C-7 of the license renewal application it states that Metals Testing Services will perform industrial radiography at the place of business outside of a field station. The information needed to support this activity was not provided.
 - A. If radiography will be performed at a site outside a field station, provide a diagram of the location where industrial radiography may be performed and its surroundings, including a description of adjacent property.
7. The Radiation Safety Manual (RSM) provided with the license renewal application makes reference to "Exhibit O, Weekly Inventory Report." No Exhibit O was included in the license renewal application; however, the RSM contained Exhibit G titled "Weekly Camera and Source Inventory Report."
 - A. Provide Exhibit O, or make corrections to the RSM to indicate that the correct reference for Exhibit O should be Exhibit G.
 - B. Provide change pages showing the corrections.
8. In page C-11 of the license renewal application (Quarterly Maintenance section) Metals Testing Services checked the box indicating that nonroutine maintenance procedures were submitted for NRC review and approval. No nonroutine maintenance procedures were submitted.
 - A. Review the examples of what constitute nonroutine maintenance in page 8-30 of NUREG-1556, Volume 2, Revision 1, and indicate if nonroutine maintenance is going to be conducted or not.
 - B. If applicable, submit nonroutine maintenance procedures for NRC review and approval. The applicant should develop procedures specific to its equipment and program, and in accordance with the recommendations of the equipment manufacturer.
9. The following information was not provided in the license renewal application.
 - A. Provide Exhibits C and F.

10. Section 3.4 (page 26) and Section 13 (page 40) of the RSM list an outdated NRC Region IV mailing address.
 - A. Provide change pages 26 and 40 showing the current NRC Region IV address (U.S. NRC Region IV, Attention: Division of Nuclear Materials Safety, 1600 East Lamar Boulevard, Arlington, TX 76011-4511).
11. Page 27 of the RSM lists an outdated reference to “NUREG-1556, Volume 2, Table 8.5.”
 - A. Provide a change page 27 showing the current reference to “NUREG-1556, Volume 2, Revision 1, Table 8-2.” Please note that the content of both Table 8.5 and Table 8-2 are the same.
12. All throughout the RSM the terminology “film badges” is used.
 - A. Provide change pages removing the terminology “film badges” if they are not currently being used and substitute with the dosimetry technology that is currently being used.
13. The first sentence in Section 7.10 (page 30) of the RSM has the following language that is unclear “... other than under normal working conditions, ...”
 - A. Provide a change page 30 explaining what this language means or showing its removal.
14. Section 8.10 (page 32) of the RSM lists outdated references to “Increased Controls” [Orders]. Increased Controls Orders were replaced by 10 CFR Part 37.
 - A. Provide a change page 32 showing the reference to “10 CFR Part 37.”
15. Sections 9.4.1 and 9.4.2 (page 33) of the RSM list an outdated reference to “NUREG-1556, Volume 2, Table 8.6.”
 - A. Provide a change page 33 showing the current reference to “NUREG-1556, Volume 2, Revision 1, Table 8-3.”
16. Table 8.6 (pages 36 and 37) of the RSM contains outdated information and needs to be replaced in its entirety with revised Table 8-3 from NUREG-1556, Volume 2, Revision 1.
 - A. Provide change pages 36 and 37 showing the revised Table 8-3 from NUREG-1556, Volume 2, Revision 1.
17. Section 12 (page 39) of the RSM makes an incorrect reference to “Mattingly Testing Services” instead of “Metals Testing Services.”
 - A. Provide a change page 39 showing the correct reference to “Metals Testing Services.”

18. Section 18 (page 42) of the RSM states that records will be maintained at 7108 Niehenke Avenue, Billings, Montana. Note that this location was released for unrestricted use with the issuance of amendment 4.

- A. Provide a change page 42 indicating the current address where records will be maintained.

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 www.nrc.gov/reading-rm/adams.html.

Thank you for your cooperation.

Sincerely,

Roberto J. Torres, M.S., Senior Health Physicist
Materials Licensing and Decommissioning Branch

Docket: 030-38893
License: 37-29406-02
Control: 623107