



**UNITED STATES  
NUCLEAR REGULATORY COMMISSION**  
REGION I  
2100 RENAISSANCE BLVD.  
KING OF PRUSSIA, PA 19406-2713

November 19, 2020

Miguel Irizarry Ocasio, Radiation Safety Officer  
Super Asphalt Pavement Corp.  
P.O. Box 1849  
Guaynabo, Puerto Rico 00970-1849

**SUBJECT: SUPER ASPHALT PAVEMENT CORP., REQUEST FOR ADDITIONAL  
INFORMATION, MAIL CONTROL NO. 623092**

Dear Mr. Irizarry Ocasio:

This is in reference to your application, dated August 24, 2020, requesting to renew NRC License No. 52-25537-01 and requesting a change in Radiation Safety Officer, effective September 1, 2020. Also, per our telephone conversation on November 19, 2020, we discussed the information below.

In order to continue our review, we need the following additional information:

1. During our conversation, we discussed that the NRC, in June 2016, issued NUREG-1556, Volume 1, Revision 2, "Consolidated Guidance About Materials Licenses: Program-Specific Guidance About Portable Gauge Licenses, Final Report", dated June 2016. Please use NUREG-1556 Volume 1, Revision 2, to prepare your response to this request for additional information letter. For convenience, the NRC's Public Website hyperlink <https://www.nrc.gov/reading-rm/doc-collections/nuregs/staff/sr1556/v1/> is being provided in this letter. Also, you may wish to consider using Appendix B of this NUREG to assist you in when providing your response.
2. In Item 1.a. of your application, you indicated that the mailing address of your license is 1700 Carretera 1 San Juan, Puerto Rico 00926-8816. The current mailing address listed on your license is P.O. Box 1849, Guaynabo, Puerto Rico. During our conversation you mentioned that the Post Office changed the address. Please confirm that the Post Office changed the address from Guaynabo, Puerto Rico to San Juan, Puerto Rico.
3. In Item 1.c. of your application, we noted that you did not list three locations of use or storage that are currently listed your license (Carr 836, Km. 1.2, Bo. Camarones, Guaynabo, Puerto Rico; Road No. 487, Km. 3.4, Buena Vista, Sector Campo Alegre, Hatillo, Puerto Rico; or Road No. PR-14, Km. 5.5, Barrio Cerrillos, Ponce, Puerto Rico). Please confirm that you wish to keep these locations on the license.

4. In Item 5 and 6: "Materials to be Possessed and Proposed Uses", of your application, we noted that you did not list the Seaman Nuclear Corporation Models C-200 and C-300 portable gauges containing Radium-226/Beryllium that are currently listed in Items 6.E., 7.E., 8.E., and 9.E. and 6.F., 7.F., 8.F., and 9.F. of your license. If you no longer possess these portable gauges, please provide the following: 1)
  - The last sealed source inventory and leak test of results of the sources, and
  - The disposal or transfer documentation showing that the sources were received by an authorized recipient.
  
5. In Item 8, "Training for Individuals Working In or Frequenting Restricted Areas", of your application, we noted that you referenced NUREG-1556, Vol 1, Rev. 1, dated November 2001. Per NUREG-1556 Vol 1, Rev 2, Section 8.8.1, "Authorized Users", "Response from Applicant", provide either of the following:
  - The statement: Before using licensed materials, authorized users will have successfully completed one of the training courses described under "Criteria" in section titled "Training for Individuals Working in or Frequenting Restricted Areas" in NUREG-1556, Volume 1, Revision 2, "Consolidated Guidance About Materials Licenses: Program-Specific Guidance About Portable Gauge Licenses".Or
  - A description of the training for proposed authorized users
  
6. In Item 9, "Facilities and Equipment", of your application, you stated that no information needs to be submitted in response to this item. However, per NUREG-1556 Vol 1, Rev. 2, Section 8.9, "Facilities and Equipment", "Response from Applicant", specifies that a facility diagram be provided for each permanent portable gauge storage location. Please 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".
  
7. In Item 10, "Radiation Safety Program-Survey Instrument", of your application, we noted that you referenced NUREG-1556, Vol 1, Rev, 1, dated November 2001. Per NUREG-1556, Vol 1, Rev 2, Section 8.10.2, "Radiation Monitoring Instruments", "Response from Applicant", provide either of the following:
  - The statement: "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, Volume 1, Revision 2, "Consolidated Guidance About Materials Licenses: Program-Specific Guidance About Portable Gauge Licenses," in the event of an incident"Or
  - a description of an alternative procedure for determining source integrity after an incident involving the gauge.

8. In Item 10, "Radiation Safety Program-Occupational Dosimetry", of your application, we noted that you did not choose the option that best corresponds with your program. Per Section 8.10.4 of NUREG-1556 Vol 1, Rev 2, "Occupational Dose", "Response from Applicant", provide one of the following:
- The statement: "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
- The statement: "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".
9. In Item 10, "Radiation Safety Program-Operating and Emergency Procedures", of your application, we noted that you referenced NUREG-1556, Vol 1. Rev. 1, dated November 2001. Per NUREG-1556, Vol 1. Rev. 2, Section 8.10.6, "Operating, Emergency, and Security Procedures", "Response from Applicant", provide one of the following:
- The statement: "We will implement and maintain the operating, emergency, and security procedures in Appendix G to NUREG-1556, Volume 1, Revision 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."
- Or
- The statement: "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, Volume 1, Revision 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."
- Or
- Alternative procedures, and the statement, "Copies of these procedures will be provided to all gauge users and will be available at each jobsite."
10. In Item 10, "Radiation Safety Program – Leak Test" of your application, we noted that the statement "Records of leak tests results will be maintained." was omitted. Per NUREG-1556, Vol 1. Rev. 2 of Section 8.10.7, "Leak Tests", "Response from Applicant", please also confirm that "Records of leak tests results will be maintained."

We will continue our review upon receipt of this information. A pdf of the signed letter may be provided by email to:

[R1DNMSMail.Resource@nrc.gov](mailto:R1DNMSMail.Resource@nrc.gov)

Reference – Laurie Kauffman

Mail Control No.: 623092

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](http://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 from 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 Laurie Kaufman at 610-337-5323 or via electronic mail at [Laurie.Kauffman@nrc.gov](mailto:Laurie.Kauffman@nrc.gov).

Thank you for your cooperation.

Sincerely,

Laurie A Kauffman, Health Physicist  
Commercial, Industrial, R&D  
and Academic Branch  
Division of Nuclear Materials Safety  
Region I

License No. 52-25537-01  
Docket No. 030-35472  
Mail Control No. 623092

cc: Gregory Mazza, Owner, CEO, Vice President

SUPER ASPHALT PAVEMENT CORP., REQUEST FOR ADDITIONAL INFORMATION, MAIL CONTROL NO. 623092  
DATED NOVEMBER 19, 2020

DOCUMENT NAME: G:\DNMS\WBL Documents\WBL License RAI\L52-25537-01.623092.RAI.docx

SUNSI Review Complete: Laurie Kauffman

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