



CONSULTING
GROUP

December 11, 2020

Ms. Jennifer Dalzell
US Nuclear Regulatory Commission – Region III
Division of Nuclear Materials Safety
2443 Warrenville Road, Suite 210
Lisle, Illinois 60532-4352

RE: Notice of Request to Amend NRC License
G2 Consulting Group, LLC – NRC License No. 21-26593-01

Dear Ms. Dalzell:

G2 would like to request an amendment to Radioactive Material License No. 21-26593-01. We are requesting to increase our number of gauges from 10 Instrotek (3500 model) to 25 Instrotek (3500 model). We are requesting to increase our number of Troxler gauges (models 3411, 3430, 3450) from 20 gauges to 25 gauges.

For additional information, please contact Bruce Wilberding, RSO for G2 or Jason Stoops at 248-680-0400.

Please let me know if you have any questions or comments regarding this notice of amendment.

Sincerely,

G2 Consulting Group, LLC

Jason B. Stoops, P.E.
Associate

JBS/BJW/jbs

Bruce J. Wilberding, P.E.
RSO / Principal

g2consultinggroup.com

Headquarters	1866 Woodslee St	Troy, MI 48083	P 248.680.0400	F 248.680.9745
Ann Arbor	1595 Eisenhower Pl	Ann Arbor, MI 48108	P 734.390.9330	F 734.390.9331
Chicagoland	1186 Heather Dr	Lake Zurich, IL 60047	P 847.353.8740	F 847.353.8742



**UNITED STATES
NUCLEAR REGULATORY COMMISSION**

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

FEB 08 2018

Bruce J. Wilberding
Radiation Safety Officer
G2 Consulting Group, LLC
1866 Woodslee Street
Troy, MI 48083

Dear Mr. Wilberding:

Enclosed is Amendment No. 8 to your NRC Material License No. 21-26593-01 in accordance with your request. Please note that the format of your license has been changed due to our new licensing process.

In your correspondence to us dated December 21, 2017, you indicated that you wished to release for unrestricted use former addresses of use located at 1595 Eisenhower Place, Ann Arbor, Michigan 48108 and 2254 Cole Street, Birmingham, Michigan 48009. Based on the information provided, the staff has concluded that all licensable material has been removed from these facilities, and residual radioactive material attributable to licensed activities does not exceed current NRC criteria. Based on these conclusions, no further remediation or actions with respect to NRC regulated material is required for these addresses of use and these locations are suitable for unrestricted use.

Items 6-9 on your license have been updated in accordance with your request and the applicable Sealed Sources and Devices Registries. Additionally, the following License Conditions have been updated in accordance with our licensing policy: Condition 10 regarding requirements for gauge usage in Agreement States, Condition 11 regarding training requirements for authorized users, Condition 13 regarding the leak test requirements for sealed sources, and Condition 15 regarding the biannual inventory requirement. License Condition 17 has been updated to remove the statement regarding the use of two physical barriers as this is now required by 10 CFR 30.34(i). Lastly, License Condition 19, as described on License Amendment No. 7, regarding transportation requirements has been deleted as these requirements are already specified in the regulations in 10 CFR Part 71.

Please review the enclosed document carefully and be sure that you understand all conditions. If there are any errors or questions, please notify the U.S. Nuclear Regulatory Commission, Region III office at (630) 829-9887 so that we can provide appropriate corrections and answers.

You will be periodically inspected by NRC. Failure to conduct your program in accordance with NRC regulations, license conditions, and representations made in your license application and supplemental correspondence with NRC will result in enforcement action against you. This could include issuance of a notice of violation, or imposition of a civil penalty, or an order suspending, modifying or revoking your license as specified in the General Statement of Policy and Procedure for NRC Enforcement Actions. Since serious consequences to employees and the public can result from failure to comply with NRC requirements, prompt and vigorous enforcement action will be taken when dealing with licensees who do not achieve the necessary meticulous attention to detail and the high standard of compliance which NRC expects of its

licensees.

The NRC's Safety Culture Policy Statement became effective in June 2011. While a policy statement and not a regulation, it sets forth the agency's *expectations* for individuals and organizations to establish and maintain a positive safety culture. You can access the policy statement and supporting material that may benefit your organization on NRC's safety culture Web site at <http://www.nrc.gov/about-nrc/regulatory/enforcement/safety-culture.html>. We strongly encourage you to review this material and adapt it to your particular needs in order to develop and maintain a positive safety culture as you engage in NRC-regulated activities.

In accordance with Title 10 Code of Federal Regulations 2.390 of the NRC's "Rules of Practice," a copy of this letter and its enclosure 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 <http://www.nrc.gov/reading-rm/adams.html>.

Sincerely,

Laura B. Cender

Laura B. Cender
Health Physicist
Materials Licensing Branch

License No. 21-26593-01
Docket No. 030-33590

Enclosure: Amendment No. 8

MATERIALS LICENSE

Pursuant to the Atomic Energy Act of 1954, as amended, the Energy Reorganization Act of 1974 (Public Law 93-438), and Title 10, Code of Federal Regulations, Chapter I, Parts 30, 31, 32, 33, 34, 35, 36, 37, 39, 40, 70 and 71, and in reliance on statements and representations heretofore made by the licensee, a license is hereby issued authorizing the licensee to receive, acquire, possess, and transfer byproduct, source, and special nuclear material designated below; to use such material for the purpose(s) and at the place(s) designated below; to deliver or transfer such material to persons authorized to receive it in accordance with the regulations of the applicable Part(s). This license shall be deemed to contain the conditions specified in Section 183 of the Atomic Energy Act of 1954, as amended, and is subject to all applicable rules, regulations, and orders of the Nuclear Regulatory Commission now or hereafter in effect and to any conditions specified below.

<p style="text-align: center;">Licensee</p> <p>1. G2 Consulting Group, LLC</p> <p>2. 1866 Woodslee Street Troy, MI 48083</p>		<p>In accordance with letter dated December 21, 2017,</p> <p>3. License number: 21-26593-01 is amended in its entirety to read as follows:</p>	<p>4. Expiration Date: May 31, 2025</p> <p>5. Docket No.: 030-33590 Reference No.:</p>
<p>6. Byproduct, source, and/or special nuclear material</p> <p>A. Cesium-137</p> <p>B. Americium-241</p> <p>C. Cesium-137</p>	<p>7. Chemical and/or physical form</p> <p>A. Sealed Sources (AEA Technology/QSA, Inc., Model CDCW556; Isotope Product Laboratories, Model HEG-137)</p> <p>B. Sealed Sources (AEA Technology/QSA, Inc., Model AMNV.997; Isotope Product Laboratories, Model 3021; 3027; Am1.NO2)</p> <p>C. Sealed Sources (AEA Technology/QSA, Inc., Model CDC.805; Isotope Product Laboratories, Model HEG-137)</p>	<p>8. Maximum amount that licensee may possess at any one time under this license</p> <p>A. 9 millicuries per source and 180 millicuries total</p> <p>B. 44 millicuries per source and 880 millicuries total</p> <p>C. 11 millicuries per source and 110 millicuries total</p>	<p>9. Authorized use</p> <p>A. For use in Troxler Electronic Laboratories Models 3411, 3430, and 3450 portable gauging devices for measuring physical properties of materials.</p> <p>B. For use in Troxler Electronic Laboratories Models 3411, 3430, and 3450 portable gauging devices for measuring physical properties of materials.</p> <p>C. For use in InstroTek, Inc. Model 3500 portable gauging devices for measuring physical properties of materials.</p>

**MATERIALS LICENSE
SUPPLEMENTARY SHEET**

License Number
21-26593-01

Docket or Reference Number
030-33590

Amendment No. 8

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|---|---|--|---|
| 6. Byproduct, source, and/or special nuclear material | 7. Chemical and/or physical form | 8. Maximum amount that licensee may possess at any one time under this license | 9. Authorized use |
| D. Americium-241 | D. Sealed Sources (AEA Technology/QSA, Inc., Model AMNV.997; Isotope Product Laboratories, Model Am1.NO2) | D. 44 millicuries per source and 440 millicuries total | D. For use in InstroTek, Inc. Model 3500 portable gauging devices for measuring physical properties of materials. |

CONDITIONS

10. Licensed material may be used or stored at the licensee's facilities located at:
- A. 1866 Woodslee Street, Troy, Michigan, 48083
 - B. 1350 Eisenhower Place, Ann Arbor, Michigan, 48108

Licensed material may be used 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. If the jurisdiction status of a Federal facility within an Agreement State is unknown, the licensee should contact the Federal agency controlling the job site in question to determine whether the proposed job site is an area of exclusive Federal jurisdiction. Authorization for use of radioactive materials at job sites in Agreement States not under exclusive Federal jurisdiction shall be obtained from the appropriate state regulatory agency.

11. Licensed material shall only be used by, or under the supervision and in the physical presence of, individuals who have received the training described in the application dated November 4, 2014. The licensee shall maintain records of individuals designated as users for 3 years following the last use of licensed material by the individual.
12. The Radiation Safety Officer (RSO) for this license is Bruce J. Wilberding.

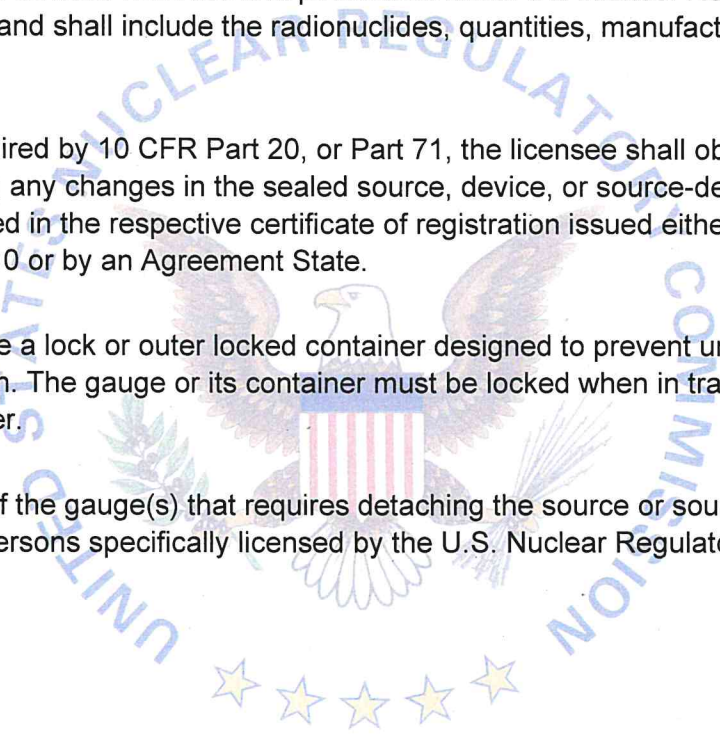
**MATERIALS LICENSE
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13. A. Sealed sources and detector cells shall be tested for leakage and/or contamination at intervals not to exceed the intervals specified in the certificate of registration issued by the U.S. Nuclear Regulatory Commission under 10 CFR 32.210 or by an Agreement State. In the absence of a registration certificate, sealed sources shall be tested for leakage and/or contamination at intervals not to exceed 6 months, or at such other intervals as specified.
- B. In the absence of a certificate from a transferor indicating that a leak test has been made within the intervals specified in the certificate of registration issued by the U.S. Nuclear Regulatory Commission under 10 CFR 32.210 or by an Agreement State, prior to the transfer, a sealed source received from another person shall not be put into use until tested and the test results received.
- C. Sealed sources need not be tested if they are in storage and are not being used. However, when they are removed from storage for use or transferred to another person, and have not been tested within the required leak test interval, they shall be tested before use or transfer. No sealed source shall be stored for a period of more than 10 years without being tested for leakage and/or contamination.
- D. The leak test shall be capable of detecting the presence of 185 becquerels (0.005 microcuries) of radioactive material on the test sample. If the test reveals the presence of 185 becquerels (0.005 microcuries) or more of removable contamination, a report shall be filed with the U.S. Nuclear Regulatory Commission in accordance with 10 CFR 30.50(c)(2), and the source shall be removed immediately from service and decontaminated, repaired, or disposed of in accordance with Commission regulations.
- E. Analysis of leak test samples and/or contamination shall be performed by persons specifically licensed by the U.S. Nuclear Regulatory Commission or an Agreement State to perform such services. The licensee is authorized to collect leak test samples but not perform the analysis.
- F. Records of leak test results shall be kept in units of becquerels (microcuries) and shall be maintained for 3 years.
14. Sealed sources or source rods containing licensed material shall not be opened or sources removed or detached from source rods or gauges by the licensee, except as specifically authorized.

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15. The licensee shall conduct a physical inventory every 6 months, or at other intervals approved by the U.S. Nuclear Regulatory Commission, to account for all sealed sources and/or devices received and possessed under the license. Records of inventories shall be maintained for 3 years from the date of each inventory, and shall include the radionuclides, quantities, manufacturer's name and model numbers, and the date of the inventory.
 16. Except for maintaining labeling as required by 10 CFR Part 20, or Part 71, the licensee shall obtain authorization from the U.S. Nuclear Regulatory Commission before making any changes in the sealed source, device, or source-device combination that would alter the description or specifications as indicated in the respective certificate of registration issued either by the U.S. Nuclear Regulatory Commission pursuant to 10 CFR 32.210 or by an Agreement State.
 17. Each portable nuclear gauge shall have a lock or outer locked container designed to prevent unauthorized or accidental removal of the sealed source from its shielded position. The gauge or its container must be locked when in transport or storage, or when not under the direct surveillance of an authorized user.
 18. Any cleaning, maintenance, or repair of the gauge(s) that requires detaching the source or source rod from the gauge shall be performed only by the manufacturer or by other persons specifically licensed by the U.S. Nuclear Regulatory Commission or an Agreement State to perform such services.
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19. Except as specifically provided otherwise in this license, the licensee shall conduct its program in accordance with the statements, representations, and procedures contained in the documents, including any enclosures, listed below. This license condition applies only to those procedures that are required to be submitted in accordance with the regulations. The U.S. Nuclear Regulatory Commission's regulations shall govern unless the statements, representations, and procedures in the licensee's application and correspondence are more restrictive than the regulations.
- A. Application dated November 4, 2014 excluding request to name future RSOs prior to submitting a license amendment request (ML14309A347)
 - B. Letter dated December 21, 2017 (ML17355A510)
 - C. Letter dated January 8, 2018 (ML18009A217)



FOR THE U.S. NUCLEAR REGULATORY COMMISSION

Date: FEB 08 2018

By: _____


Frank P.D. Tran
Region III

Song, Taehoon

From: Dalzell, Jennifer
Sent: Monday, December 14, 2020 9:10 AM
To: Song, Taehoon; Pavon, Sandy
Cc: Orlikowski, Robert
Subject: FW: Amendment request for G2 Consulting Group License No. 21-26593-01
Attachments: amendment letter for License No. 21-26593-01 dated Dec 11 2020.pdf; G2 NRC License Feb 2018.pdf

Good Morning,

I received the attached amendment request on Friday. This will probably need to be added to ADAMS and processed in as a new amendment request.

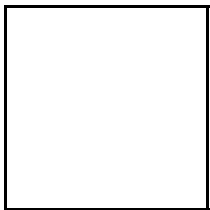
Thanks,
Jenni

From: Jason B. Stoops, P.E. <jstoops@g2consultinggroup.com>
Sent: Friday, December 11, 2020 2:19 PM
To: Dalzell, Jennifer <Jennifer.Dalzell@nrc.gov>
Cc: Bruce Wilberding P. E. <bwilberding@g2consultinggroup.com>; Joseph W. Bowles <jbowles@g2consultinggroup.com>
Subject: [External_Sender] Amendment request for G2 Consulting Group License No. 21-26593-01

Hello Jennifer

Thank you for answering my questions today. Please see the attached amendment letter for our license. I have also attached our most recent license. Please let me know you are in receipt of this email. Have a great weekend!
Jason

Jason B. Stoops, P.E.
Office Manager/Project Manager
P 734.390.9330 | M 248.640.4408
www.g2consultinggroup.com



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