



UNITED STATES
NUCLEAR REGULATORY COMMISSION

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

February 9, 2021

Mark Behrens
Principal
Terra Site Development, Inc.
1307 W. 161st St.
Westfield, IN 46074

Dear Mr. Behrens:

A request for additional information was sent to you on January 19, 2021, in reference to your request to renew U.S. NRC Materials License #13-32741-01. A copy of this request is enclosed for your reference. A response was requested by February 3, 2021. To date, your response has not been received.

To continue the review of your request, please submit a written response to this letter by February 29, 2021. Failure to respond by this date may result in your request being abandoned or denied.

To expedite the licensing process, you may fax your response to (630) 515-1078. If you have any questions, you may contact me at (630) 829-9737 or Jason.Kelly@nrc.gov.

In accordance with Title 10 of the *Code of Federal Regulations* Section 2.390 of the U.S. Nuclear Regulatory Commission's (NRC) "Rules of Practice," a copy of this letter and enclosures 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,

A handwritten signature in black ink that reads "Jason M. Kelly".

Jason M Kelly, MPH
Health Physicist
Materials Licensing Branch

Digitally signed by Jason M. Kelly
Date: 2021.02.09 10:45:59 -06'00'
Adobe Acrobat version: 2020.013.20066

License No. 13-32741-01
Docket No. 030-38010
Control No. 621332

Enclosure(s): As Stated



UNITED STATES
NUCLEAR REGULATORY COMMISSION

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

January 19, 2021

Mark Behrens
Principal
Terra Site Development, Inc.
1307 W. 161st St.
Westfield, IN 46074

Dear Mr. Behrens:

This letter is in reference to your application dated June 22, 2020 and subsequent correspondence dated December 22, 2020, requesting the renewal of U.S. Nuclear Regulatory Commission (NRC) Materials License No. 13-32741-01.

The NRC's guidance document for your proposed type of license, which I refer to below as "the guidance", is NUREG-1556, Volume 1, Rev. 2, dated June 2016, "Consolidated Guidance About Materials Licenses, Program – Specific Guidance About Portable Gauge Licenses." This guidance is available on the NRC Web site at:

<https://www.nrc.gov/docs/ML1617/ML16175A375.pdf>

Upon review of your letter, I identified the following areas where additional or clarifying information remains needed:

1. Section 8.7.1 in the guidance identifies that the appointed Radiation Safety Officer (RSO) must have adequate training and experience. Adequate training and experience must include completion of the manufacturer's course (or an equivalent course meeting the criteria in Appendix C of the guidance) with hands-on experience with portable gauges.

Your request identified that the proposed RSO completed the Alt & Witzg Engineering, Inc. course entitled, "Radiation Safety and Use of Nuclear Gauges."

Submit documentation of the training and experience for the proposed RSO, which should include information demonstrating that the "Criteria," in Appendix C of the guidance are satisfied. This includes course content, course examination and instructor training and experience.

2. Section 8.10.8, "Maintenance," describes maintenance options for the portable gauging devices, including routine maintenance and non-routine maintenance.

Your response does not identify if you are proposing to perform non-routine maintenance or repair activities or if you will contract with the gauge manufacturer or a person specifically authorized by the NRC or an Agreement State to perform these services.

According to Section 8.10.8 of the guidance, an acceptable response, includes either:

- the statement, "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."; or
- a request to perform this non-routine maintenance or repair work "in-house," using the information in Appendix F of the guidance.

Please submit an acceptable response as specified above.

To continue the review of your amendment request, please provide a written response to this letter by February 3, 2021. Your response must be dated and signed by a management representative and include a reference to Mail Control Number 621332 in the response. To expedite the licensing process, you may fax your response to (630) 515-1078. If you have any questions or require clarification on any of the information stated above, you may contact me at (630) 829-9737 or Jason.Kelly@nrc.gov.

In accordance with Title 10 of the *Code of Federal Regulations* Section 2.390 of the U.S. Nuclear Regulatory Commission's (NRC) "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 Agencywide Documents Access and Management System (ADAMS), accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html>.

Sincerely,



Jason M. Kelly, MPH
Health Physicist
Materials Licensing Branch

Digitally signed by Jason M. Kelly
Date: 2021.01.19 16:12:49 -06'00'
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License No. 13-32741-01
Docket No. 030-38010
Control No. 621332