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February 16, 2021

Bryan Parker, License Reviewer  
Division of Nuclear Materials Safety  
U.S. NRC Region III  
2443 Warrenville Road  
Suite 210  
Lisle, Illinois 60532-4352

SUBJECT: License Amendment Request, License No. 13-32049-01, Docket No. 030-34598

Dear Mr. Parker:

Per your telephone conversation with Doug Beek on February 8, 2021 at 2:25 P.M. we are requesting condition 12 of our license be changed to read:

*Licensed material shall be used by or under the supervision of persons who have been trained in accordance with NRC regulations, this license and AIS Gauging's Radiation Protection Program.*

The following parts of our Radiation Protection Program are on file with the agency:

1. Radiation Safety Manual
2. Training program
3. Device Servicing Manual

We provide our authorized users with training in the classroom, practical exercises, and hands-on exercises before designated an authorized user. For your reference I have attached AIS Gauging's Authorized User Training curriculum.

Please let me know if you require anything else. Doug Beek is authorized to work with you on the license amendment.

Sincerely,

cc: Doug Beek – AIS Gauging

A handwritten signature in black ink, appearing to read 'John Young', is written over the typed name.

**John Young, President**

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**INITIAL TRAINING**

AIS Gauging Authorized User Training shall be provided:

- Before assuming duties with, or in the vicinity of, radioactive materials.
- Whenever there is a significant change in the AU duties, regulations, or the terms and conditions of the license.
- Annually for refresher training as prescribed in refresher training.

This training is in accordance with NUREG 1556, Volume 18, Rev. 1 - Consolidated Guidance About Materials Licenses, Program-Specific Guidance About Service Provider Licenses, Appendix D, Criteria for Acceptable Training and Experience for Authorized Users. Training shall only be conducted by the RSO or persons appointed by the RSO who have, at minimum, the same qualifications. Training shall be provided commensurate with the duties and responsibilities of the individual Authorized User.

Topics shall include but not be limited to:

- Fundamentals of Radiation Safety:
  - Characteristics of radiation
  - Units of radiation dose and quantity of radioactivity
  - Hazards of exposure to radiation
  - Levels of radiation from licensed material
  - Methods of controlling radiation dose (time, distance, and shielding)
  - ALARA concept.
- Radiation Protection Principles;
  - Radiation vs. Contamination
  - Internal vs. External Exposure
  - Biological Effects of Radiation
  - Units of Radiation Dose and Quantities
- Radiation Detection Instruments:
  - Operation
  - Calibration
  - Limitations of radiation survey instruments
  - Radiation survey techniques for measuring radiation field
  - Radiation survey techniques for measuring removable/fixed contamination
- Personnel Dosimetry
- Employee Protection
- Postings
- Container Labeling
- Material Control and Accountability
- Transfer and Disposal
- Handling and Reporting Incidents or Events
- Deliberate Misconduct
- Record Keeping
- Need for Complete and Accurate Information
- NRC Licensing

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- Reciprocity and the Agreement State Program
- Radiation Safety Program Audits
- Agency Inspections
- Regulations of the NRC as applicable
  - 10 CFR Parts 19 and 20
  - 10 CFR Parts 21, 30, 31, 32, 33, 34, 35, 36, 37, 39, 40, 61, 70, and 71
- Operating and Emergency Procedures
- Shipping and Receiving Sealed Sources
  - DOT 49 CFR
  - IATA Regulations
- Handling and Using Sealed Sources
  - Practical Demonstration
  - Hands on Exercise
- Radiation Protection Equipment
  - Proper use of protective equipment
  - Decontamination of contaminated protection equipment
- Case histories relevant to operations
- Course Examination
  - Successful completion of closed-book written/oral examination depending on the complexity and hazards of authorized activities
  - Review of incorrect answers with student
- On-the Job Training and Examination (Practical):
  - On-the-job training completed under the supervision of a qualified individual [authorized user (AU), radiation safety officer (RSO), or an individual authorized by the RSO who has, at minimum, the same qualifications of an AU. The training shall include supervised hands-on experience performing the task authorized on the license that is commensurate with the expected hazards during routine and emergency conditions
  - Practical examination consisting of an assessment by the RSO or an individual appointed by the RSO and who has, at minimum, the same qualifications as the RSO to ensure that each proposed AU is qualified to work independently and that each person is knowledgeable of the radiation safety aspects of licensed activities. This may be demonstrated by observing the proposed AU perform licensed activities.
- Discussion and/or drill on all applicable emergency procedures annually.
- Retraining on areas found to be deficient in both the practical and didactic areas.

## **REFRESHER TRAINING**

Refresher Training is provided annually. These trainees shall have received initial training as prescribed above. Refresher training shall include but not limited to:

- Regulatory Agencies

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- Responsibilities
- Dose/Exposure Report
- Notifications to workers
- Discussion and/or drill on all applicable emergency procedures
- Changes in Regulations
- Results of the last independent audit
- Results of the last agency inspection
- Postings
- ALARA
- Safe working conditions
- Radiation Detection Instruments:
  - Operation
  - Calibration
  - Limitations of radiation survey instruments
  - Radiation survey techniques for measuring radiation field
  - Radiation survey techniques for measuring removable/fixed contamination
- Refresher training shall include areas where proficiency has diminished.

## **RECORDS**

Training records shall be held by the RSO for inspection by the Agency. Records shall include:

- Course Title
- Course Date
- Next Training Due
- Instructor(s)
- Trainee
- Results of the training (Pass/Fail)
- Contents of the course

The RSO shall maintain a current listing of Authorized Users showing:

- Authorized User Name
- Last Training Date
- Course Title
- Instructor(s)
- Next Training Due

## Song, Taehoon

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**From:** Doug Beek <doug.beek@aisgauging.com>  
**Sent:** Wednesday, February 17, 2021 6:36 PM  
**To:** Parker, Bryan  
**Cc:** John Young; Amy Sherrill  
**Subject:** [External\_Sender] License Amendment Request, License No. 13-32049-01, Docket No. 030-34598  
**Attachments:** License Amendment Request.pdf; AIS Authorized User Training.pdf

Bryan,

Per our telephone conversation last week, here is the amendment request to remove Authroized Users from our materials license. I have included the License Amendment Request letter, from John Youg our company president and RSO, along with AIS Gauging's Authorized User Training curriculum. Let me know if there is anything else I need to do to make this happen.

Thanks so much for your help.

Best Regards,  
Doug

**Doug Beek**  
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