NRC FORM 699
(11-2017)

U.S. NUCLEAR REGULATORY COMMISSION

CONVERSATION RECORD

NAME OF PERSON(S)/TITLE CONTACTED OR IN CONTACT WITH YOU	DATE OF CONTACT	TYPE OF CONVERSATION
Kerry Randles	11/03/2020	☐ E-MAIL ☑ TELEPHONE ☐ INCOMING ☑ OUTGOING
E-MAIL ADDRESS randlesk@hscast.com	**TELEPHONE NUMBER** 765-762-9051	
ORGANIZATION Harrison Steel Casting Company	**DOCKET NUMBER(S)** 030-04335	
LICENSE NAME AND NUMBER(S) Harrison Steel Casting Company 13-02141-01	**MAIL CONTROL NUMBER(S)** CN 623076	

SUBJECT

Pending NRC License Renewal Request - Additional Information Required.

SUMMARY AND ACTION REQUIRED (IF ANY)

This is a record of the conversation between Laura Cender and Kerry Randles, of Harrison Steel Casting Company, regarding the pending NRC license renewal request.

While an NRC Form 313 dated September 9, 2020 was submitted, the full application response was not received. Please prepare and resubmit your license renewal request in accordance with the attached application. Please reference NRC guidance document NUREG 1556 Vol. 2 Rev. 1 when preparing your application, with particular attention to Section 8 which provides detailed guidance on completion of each application item.

Please provide your signed and dated response by no later than Friday, December 4, 2020.

NAME OF PERSON DOCUMENTING CONVERSATION

Laura B. Cender

SIGNATURE	DATE OF SIGNATURE
Laura B. Cender Digitally signed by Laura B. Cender Date: 2020.11.03 08:46:48 -06'00'	11/03/2020

NRC FORM 313 (06-2016)
10 CFR 30, 32, 33, 34
35, 36, 37, 39, and 40

U.S. NUCLEAR REGULATORY COMMISSION

APPLICATION FOR MATERIALS LICENSE

APPROVED BY OMB: NO. 3150-0120 **EXPIRES: 06/30/2019**

Estimated burden per response to comply with this mandatory collection request: 4.3 hours. Submittal of the application is necessary to determine that the applicant is qualified and that adequate procedures exist to protect the public health and safety. Send comments regarding burden estimate to the FOIA, Privacy, and Information Collections Branch (T-5 F53), U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001, or by e-mail to Infocollects.Resource@nrc.gov, and to the Desk Officer, Office of Information and Regulatory Affairs, NEOB-10202, (3150-0120), Office of Management and Budget, Washington, DC 20503. If a means used to impose an information collection does not display a currently valid OMB control number, the NRC may not conduct or sponsor, and a person is not required to respond to, the information collection.

INSTRUCTIONS: SEE THE CURRENT VOLUMES OF THE NUREG-1556 TECHNICAL REPORT SERIES ("CONSOLIDATED GUIDANCE ABOUT MATERIALS LICENSES") FOR DETAILED INSTRUCTIONS FOR COMPLETING THIS FORM: http://www.nrc.gov/reading-rm/doc-collections/nuregs/staff/sr1556/. SEND TWO COPIES OF THE COMPLETED APPLICATION TO THE NRC OFFICE SPECIFIED BELOW.

APPLICATION FOR DISTRIBUTION OF EXEMPT PRODUCTS FILE APPLICATIONS WITH:

MATERIALS SAFETY LICENSING BRANCH
DIVISION OF MATERIAL SAFETY, STATE, TRIBAL AND RULEMAKING PROGRAMS
OFFICE OF NUCLEAR MATERIALS SAFETY AND SAFEGUARDS
U.S. NUCLEAR REGULATORY COMMISSION
WASHINGTON, DC 20555-0001

ALL OTHER PERSONS FILE APPLICATIONS AS FOLLOWS:

IF YOU ARE LOCATED IN:

ALABAMA, CONNECTICUT, DELAWARE, DISTRICT OF COLUMBIA, FLORIDA, GEORGIA, KENTUCKY, MAINE, MARYLAND, MASSACHUSETTS, NEW HAMPSHIRE, NEW JERSEY, NEW YORK, NORTH CAROLINA, PENNSYLVANIA, PUERTO RICO, RHODE ISLAND, SOUTH CAROLINA, TENNESSEE, VERMONT, VIRGINIA, VIRGIN ISLANDS, OR WEST VIRGINIA,

SEND APPLICATIONS TO:

LICENSING ASSISTANCE TEAM
DIVISION OF NUCLEAR MATERIALS SAFETY
U.S. NUCLEAR REGULATORY COMMISSION, REGION I
2100 RENAISSANCE BOULEVARD, SUITE 100
KING OF PRUSSIA, PA 19406-2713

IF YOU ARE LOCATED IN:

ILLINOIS, INDIANA, IOWA, MICHIGAN, MINNESOTA, MISSOURI, OHIO, OR WISCONSIN, SEND APPLICATIONS TO:

MATERIALS LICENSING BRANCH
U.S. NUCLEAR REGULATORY COMMISSION, REGION III
2443 WARRENVILLE ROAD, SUITE 210
LISLE, IL 60532-4352

ALASKA, ARIZONA, ARKANSAS, CALIFORNIA, COLORADO, HAWAII, IDAHO, KANSAS, LOUISIANA, MISSISSIPPI, MONTANA, NEBRASKA, NEVADA, NEW MEXICO, NORTH DAKOTA, OKLAHOMA, OREGON, PACIFIC TRUST TERRITORIES, SOUTH DAKOTA, TEXAS, UTAH, WASHINGTON, OR WYOMING,

SEND APPLICATIONS TO:

NUCLEAR MATERIALS LICENSING BRANCH
U.S. NUCLEAR REGULATORY COMMISSION, REGION IV
1600 E. LAMAR BOULEVARD
ARLINGTON, TX 76011-4511

PERSONS LOCATED IN AGREEMENT STATES SEND APPLICATIONS TO THE U.S. NUCLEAR REGULATORY COMMISSION ONLY IF THEY WISH TO POSSESS AND USE LICENSED MATERIAL IN STATES SUBJECT TO U.S.NUCLEAR REGULATORY COMMISSION JURISDICTIONS.

1. THIS IS AN APPLICATION FOR *(Check appropriate item)*

- ☐ A. NEW LICENSE
- ☐ B. AMENDMENT TO LICENSE NUMBER _____
- ☐ C. RENEWAL OF LICENSE NUMBER _____

2. NAME AND MAILING ADDRESS OF APPLICANT *(Include ZIP code)*

3. ADDRESS WHERE LICENSED MATERIAL WILL BE USED OR POSSESSED

4. NAME OF PERSON TO BE CONTACTED ABOUT THIS APPLICATION

BUSINESS TELEPHONE NUMBER | BUSINESS CELLULAR TELEPHONE NUMBER

BUSINESS EMAIL ADDRESS

SUBMIT ITEMS 5 THROUGH 11 ON 8-1/2 X 11" PAPER. THE TYPE AND SCOPE OF INFORMATION TO BE PROVIDED IS DESCRIBED IN THE LICENSE APPLICATION GUIDE.

5. RADIOACTIVE MATERIAL

a. Element and mass number; b. chemical and/or physical form; and c. maximum amount which will be possessed at any one time.

6. PURPOSE(S) FOR WHICH LICENSED MATERIAL WILL BE USED.

7. INDIVIDUAL(S) RESPONSIBLE FOR RADIATION SAFETY PROGRAM AND THEIR TRAINING AND EXPERIENCE.

8. TRAINING FOR INDIVIDUALS WORKING IN OR FREQUENTING RESTRICTED AREAS.

9. FACILITIES AND EQUIPMENT.

10. RADIATION SAFETY PROGRAM.

11. WASTE MANAGEMENT.

12. LICENSE FEES (Fees required only for new applications, with few exceptions*)
(See 10 CFR 170 and Section 170.31)
***Amendments/Renewals that increase the scope of the existing license to a new or higher fee category will require a fee.**

FEE CATEGORY ☐ AMOUNT ENCLOSED $ ☐

13. CERTIFICATION. *(Must be completed by applicant) THE APPLICANT UNDERSTANDS THAT ALL STATEMENTS AND REPRESENTATIONS MADE IN THIS APPLICATION ARE BINDING UPON THE APPLICANT.*

THE APPLICANT AND ANY OFFICIAL EXECUTING THIS CERTIFICATION ON BEHALF OF THE APPLICANT, NAMED IN ITEM 2, CERTIFY THAT THIS APPLICATION IS PREPARED IN CONFORMITY WITH TITLE 10, CODE OF FEDERAL REGULATIONS, PARTS 30, 32, 33, 34, 35 , 36, 37, 39, AND 40, AND THAT ALL INFORMATION CONTANED HEREIN IS TRUE AND CORRECT TO THE BEST OF THEIR KNOWLEDGE AND BELIEF.
WARNING: 18 U.S.C. SECTION 1001 ACT OF JUNE 25, 1948 62 STAT. 749 MAKES IT A CRIMINAL OFFENSE TO MAKE A WILLFULLY FALSE STATEMENT OR REPRESENTATION TO ANY DEPARTMENT OR AGENCY OF THE UNITED STATES AS TO ANY MATTER WITHIN ITS JURISDICTION.

CERTIFYING OFFICER -- TYPED/PRINTED NAME AND TITLE | SIGNATURE | DATE

FOR NRC USE ONLY

TYPE OF FEE	FEE LOG	FEE CATEGORY	AMOUNT RECEIVED $	CHECK NUMBER	COMMENTS
APPROVED BY				DATE	

APPENDIX C

SUGGESTED FORMAT FOR PROVIDING INFORMATION REQUESTED IN ITEMS 5 THROUGH 11 OF U.S. NUCLEAR REGULATORY COMMISSION FORM 313

Suggested Format for Providing Information Requested in Items 5 through 11 of U.S. Nuclear Regulatory Commission Form 313

Item No.	Title and Criteria	Yes	Description Attached
5	**RADIOACTIVE MATERIAL** **Sealed Sources and Devices**		
	• Identify each radionuclide that will be used for performing radiography, maximum activity per source, and total possession limit.		[ ]
	• Identify the manufacturer (or distributor) and model number of each sealed source.		[ ]
	• Identify the manufacturer (or distributor) and model number of each exposure device. Indicate if a device is only to be used in a permanent radiographic installation.		[ ]
	• Identify the manufacturer (or distributor) and model number of each source changer.		[ ]
	• If depleted uranium is used as shielding material, specify the total amount (in kilograms).		[ ]
	• Confirm that each sealed source, device, and source/device combination possessed is registered as an approved sealed source or device by the U.S. Nuclear Regulatory Commission (NRC) or an Agreement State and will be possessed and used in accordance with the conditions specified in the registration certificate. Obtain from the manufacturer/distributor a copy of the SSD certificate and provide the SSD registry number with the application.	[ ]	
	• Confirm that associated equipment is compatible with the exposure devices, source changers, and sealed sources containing byproduct material.	[ ]	
	• Confirm that only radiographic exposure devices, source assemblies or sealed sources, and associated equipment, which meet the requirements specified in Title 10 of the *Code of Federal Regulations* (10 CFR) 34.20, "Performance requirements for industrial radiography equipment," will be used in radiographic operations.	[ ]	
	• Identify each radionuclide and the manufacturer (or distributor) and model number of each sealed source and/or device containing byproduct material that will not be used for performing radiography.	[ ]	

Item No.	Title and Criteria	Yes	Description Attached
5	**RADIOACTIVE MATERIAL** **Financial Assurance and Recordkeeping for Decommissioning** • 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. **AND** • If financial assurance is required, submit evidence following NUREG–1757, Volume 3.	[ ]	[ ]
6	**PURPOSE(S) FOR WHICH LICENSED MATERIAL WILL BE USED** Equipment will be used for the following: • industrial radiography • underwater radiography (see Appendix D) • lay-barge radiography (see Appendix D) • offshore platform radiography (see Appendix D) • other than radiography (example, Cs-137 instrument calibrator)	[ ] [ ] [ ] [ ]	[ ]

Item No.	Title and Criteria	Yes	Description Attached
7	**INDIVIDUAL(S) RESPONSIBLE FOR RADIATION SAFETY PROGRAM AND THEIR TRAINING AND EXPERIENCE** **Radiation Safety Officer (RSO)**		
	• The name of the proposed RSO and other potential designees who will be responsible for ensuring that the licensee's radiation safety program is implemented in accordance with approved procedures.		[ ]
	AND		
	• 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.		[ ]
	AND EITHER		
	• The specific training and experience of the RSO and other potential designees. Include the specific dates of certification and/or training in radiation safety.		[ ]
	• Documentation to show that the RSO has a minimum of 2,000 hours of hands-on experience as a qualified radiographer in industrial radiographic operations.		[ ]
	• Documentation to show that the RSO has obtained formal training in the establishment and maintenance of a radiation protection program.		[ ]
	OR		
	• Alternative information demonstrating that the proposed RSO is qualified by training and experience (e.g., certification by the American Board of Health Physicists, completion of a bachelor's or master's degree in the sciences with at least 1 year of experience in the conduct of a radiation safety program of comparable size and scope).		[ ]
	• Documentation to show that the RSO has obtained formal training in the establishment and maintenance of a radiation protection program.		[ ]

Item No.	Title and Criteria	Yes	Description Attached
8	**TRAINING FOR RADIOGRAPHERS AND RADIOGRAPHER'S ASSISTANTS**		
	• Submit an outline of the training to be given to prospective radiographers and radiographer's assistants. Submit your procedures for experienced radiographers who have worked for another licensee.		[ ]
	• Provide a copy of a typical examination and the correct answers to the examination questions. Indicate the passing grade.		[ ]
	• Submit all training program descriptions noted in 10 CFR 34.43, except for those training and examination program topics listed in 10 CFR 34.43(g).		[ ]
	• Specify the qualifications of your instructors in radiation safety principles and describe their experience with radiography. If training will be conducted by someone outside the applicant's organization, identify the course by title and provide the name and address of the company providing the training.		[ ]
	• Describe the practical field examination that will be given to prospective radiographers and radiographer's assistants.		[ ]
	• Describe the annual refresher training program, including topics to be covered and how the training will be conducted.		[ ]
	• Submit your procedures for verifying and documenting the certification status of radiographers and for verifying that their certification remains valid.		[ ]
	• Submit a description of your program for inspecting the job performance of each radiographer and radiographer's assistant at intervals not to exceed 6 months, as described in 10 CFR 34.43(e).		[ ]

Item No.	Title and Criteria	Yes	Description Attached
9	**FACILITIES AND EQUIPMENT** **Permanent Radiographic Installations** Provide the following information for each permanent radiographic installation:		
	• Provide an annotated sketch or drawing of the facility and its surroundings. (Note: Diagrams of facilities should be marked: "Security-related information—Withhold under 10 CFR 2.390.") Sketches or drawings should also include a compass directional arrow to indicate "North."		[ ]
	• Identify the scale to which the sketch or drawing is made.		[ ]
	• Identify the type, thickness, and density of shielding materials on all sides, including the floor and the roof.		[ ]
	• Identify the locations of entrance ways and other points of access to the facility.		[ ]
	• Describe the areas adjacent to the facility and the distance to these areas. Include information on areas adjacent to, above, and below the facility.		[ ]
	• Describe the general location of each proposed permanent radiographic facility listed in Item 3 (e.g., located in an industrial park, an office complex) and its current use.		[ ]
	• If a proposed permanent radiographic facility is a private residence, provide diagrams of the installation that include the building, the proposed restricted area(s), and adjacent areas, including above and below the restricted areas. (Note: Local municipalities may limit the use of radioactive material to certain zone areas.)		[ ]
	• Restricted areas do not include residential quarters.		[ ]
	• Explain how radiation levels in unrestricted areas will be maintained at less than 0.02 millisievert (mSv) [2 millirem (mrem)] in any one hour and less than 1 mSv [100 mrem] per year.		[ ]
	• Describe the visible-audible signal system or entrance control system and its locations.		[ ]
	• Provide the results of radiation-level calculations or actual radiation measurements adjacent to, above, and below the facility.		[ ]
	• Indicate whether or not radiography will be performed at the place of business outside of a permanent radiographic installation. If radiography will be performed at a site outside of a permanent radiographic installation, provide a diagram of the location where radiography may be performed and its surroundings, including a description of adjacent property.		[ ]

Item No.	Title and Criteria	Yes	Description Attached
9	**FACILITIES AND EQUIPMENT** **Permanent Radiographic Installations** Provide the following information to obtain approval for a variance if construction requirements preclude shielding the roof to meet the requirement not to exceed 2 mrem [0.02 mSv] in any one hour: • means of preventing access to the roof • procedures for ensuring that no individual is on the roof or could gain access to the roof during radiography • a commitment that the roof will be posted with "Caution (or Danger) Radiation Area" sign(s) • steps taken to minimize radiation on the roof • limitations (if needed) on positioning of sealed sources or type (radionuclide) and amount of radioactive material that may be used in the installation to ensure that areas adjacent to, above, and below the installation will be unrestricted areas during the performance of radiography In addition to the above, provide the following information to obtain approval for a variance if radiation levels on the radiographic installation roof exceed 100 mrem [1.0 mSv] in any one hour: • a commitment that the roof will be posted with a "Caution (or Danger) High-Radiation Area" sign(s) • evidence of constant surveillance of the roof by closed-circuit television • a description of a control device that would automatically reduce the radiation level to 100 mrem [1.0 mSv] in any one hour at 30 centimeters from the radiation source if someone enters the roof • a description of a control device that activates a visible-audible signal so that both an individual entering the roof and the radiographer on duty are made aware of the entry	[ ]	[ ] [ ] [ ] [ ] [ ] [ ] [ ] [ ]

Item No.	Title and Criteria	Yes	Description Attached
9	**FACILITIES AND EQUIPMENT** **Field Stations** Provide the following information for each field station: • Describe the storage location(s) at the address(es) listed in Item 3 of the application, and submit a diagram showing where the radiography camera will be stored at the field stations. • Indicate whether or not industrial radiography will be performed at the place of business outside of a field station. • 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. **Temporary Jobsites** Indicate in Item 3 of the application that the applicant is requesting authorization to perform work at temporary jobsites anywhere in the U.S. 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.	[ ] [ ]	[ ]
10	**RADIATION SAFETY PROGRAM** **1. Audit and Review of Program** The applicant is <u>not</u> required to, and should not, submit its audit program to the NRC for review during the licensing phase. (See Appendix G for a sample radiation safety program audit). Audits will be reviewed during inspections to determine compliance with NRC regulations.	Need Not Be Submitted With Application	

Item No.	Title and Criteria	Yes	Description Attached
10	**RADIATION SAFETY PROGRAM** **2. Instruments** We will possess and use calibrated and operable radiation survey meters.	[ ]	
	AND		
	Calibration will be performed by an NRC or Agreement State licensee specifically authorized to perform instrument calibration.	[ ]	
	OR		
	Calibration is to be performed in-house, and the model procedures in Appendix H will be followed.	[ ]	
	Calibration is to be performed in-house, and alternate procedures will be followed.		[ ]
	Identify the qualifications of the individuals who will perform the calibrations. **3. Material Receipt and Accountability**		[ ]
	Physical inventories will be conducted and documented at quarterly intervals (not to exceed 3 months) to account for all sealed sources containing byproduct material and devices containing depleted uranium received and possessed under the license.	[ ]	
	AND		
	We will develop, implement, and maintain procedures for ensuring accountability of licensed materials at all times.	[ ]	
	AND		
	We will comply with NSTS reporting requirements as described in 10 CFR 20.2207	[ ]	

Item No.	Title and Criteria	Yes	Description Attached
10	**RADIATION SAFETY PROGRAM** **4. Minimization of Contamination** The applicant is <u>not</u> required to provide a response to the minimization of contamination, if the applicant's responses meet the criteria for the following sections: "Radioactive Material—Sealed Sources and Devices;" "Facilities and Equipment;" "Radiation Safety Program—Leak Tests;" "Radiation Safety Program—Operating and Emergency Procedures;" and "Waste Management—Sealed Source/DU Device Transfer and Disposal."	Need Not Be Submitted With Application	
	5. Leak Tests Leak tests sample collection and analysis will be performed by an organization authorized by the NRC or an Agreement State to provide leak-testing services to other licensees; or by using a leak-test sample collection kit supplied by an organization licensed by the NRC or an Agreement State to provide leak-test kits and sample analysis services to other licensees and according to the instructions provided in the leak-test sample collection kit.	[ ]	
	OR		
	Leak testing will be done by the applicant.	[ ]	
	• The information in Appendix I supporting a request to perform leak testing and sample analysis is attached.		[ ]
	• We will follow the model procedures in Appendix I of NUREG—1556, Volume 2, Revision 1.	[ ]	
	• We will follow alternate procedures.		[ ]

Item No.	Title and Criteria	Yes	Description Attached
10	**RADIATION SAFETY PROGRAM** **6. Occupational Dosimetry** Radiography personnel will wear film, thermoluminescent dosimeter, or other personal dosimetry processed and evaluated by a processor accredited by the National Voluntary Laboratory Accreditation Program and exchanged at the required frequency. Radiographic personnel will wear the required personnel monitoring equipment, including 0–200 mrem [0–2 mSv] dosimeters or electronic personal dosimeters. All radiography personnel will wear alarming ratemeters, except those personnel at permanent radiography installations where other appropriate alarming or warning devices are in use and are operational. Pocket dosimeters and alarm ratemeters will be checked for correct response to radiation at intervals not to exceed 12 months. • If adjustment is necessary, the devices will be returned to the manufacturer. • If adjustment is necessary, in-house procedures for adjustments are described.	[ ] [ ] [ ] [ ] [ ]	[ ]
	7. Public Dose The applicant is <u>not</u> required to, and should not, submit a response to the public dose section during the licensing phase. Public dose will be reviewed during inspections to determine compliance with NRC regulations. Appendix J provides additional information for determining that radiation doses for other licensee personnel and members of the public will not exceed allowable limits.	Need Not Be Submitted With Application	

Item No.	Title and Criteria	Yes	Description Attached
10	**RADIATION SAFETY PROGRAM** **8. Quarterly Maintenance** Submit the quarterly maintenance procedures to the NRC for review and approval. The applicant should develop procedures specific to its equipment and program. The guidance provided in Sections 8.10.8, "Quarterly Maintenance," and 8.10.9, "Operating and Emergency Procedures," of NUREG–1556, Volume 2 should be of assistance in the development of the applicant's procedures.		[ ]
	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.		[ ]
	Before using a new sealed source/device combination, we will have written inspection and maintenance procedures that address the use of the new equipment as a Type B transport package. In addition, we will provide training to radiographic personnel before using a new sealed source/device combination.	[ ]	
	9. Operating and Emergency Procedures **(Note: If requesting authorization for underwater, lay-barge, or offshore radiography, provide appropriate additional information as described in Appendix D).** **Handling and Use of Sealed Sources and Radiography Exposure Devices** Submit operating and emergency procedures that provide step-by-step instructions for using each type of radiographic device. Submit operating and emergency procedures that provide instructions for performing source exchanges. Instructions for crankout devices should be separate from those for other categories of exposure devices.		[ ]
	Methods and Occasions for Conducting Radiation Surveys Submit operating and emergency procedures that, where applicable, include each of the radiation surveys included in Table 8-2.		[ ]
10	**RADIATION SAFETY PROGRAM** **Methods for Controlling Access to Radiographic Areas** Submit the procedures to control access to radiographic operations and storage areas.		[ ]

Item No.	Title and Criteria	Yes	Description Attached
	Methods and Occasions for Locking and Securing Radiographic Exposure Devices, Storage Containers, and Sealed Sources Submit operating and emergency procedures that include procedures for locking and securing radiographic equipment.		[ ]
	Personnel Monitoring and the Use of Personnel Monitoring Equipment Submit operating procedures that include instructions for proper use of personnel monitoring equipment.		[ ]
	Transporting Sealed Sources to Field Locations, Securing Exposure Devices and Storage Containers in Vehicles, Posting Vehicles, and Controlling Sealed Sources during Transportation Submit operating and emergency procedures for transporting sealed sources containing byproduct material, radiographic exposure devices, and source changers.		[ ]
	Daily Inspection and Maintenance of Radiographic Equipment Submit operating and emergency procedures for daily inspection and maintenance of radiographic equipment.		[ ]
	Ratemeter Alarms or Off-Scale Dosimeter Readings Submit operating and emergency procedures to address ratemeter alarms or off-scale dosimeters.		[ ]
	Procedure for Identifying and Reporting Defects and Noncompliance as Required by 10 CFR Part 21 Submit operating and emergency procedures for notifying management of equipment malfunction or defect.		[ ]
10	**RADIATION SAFETY PROGRAM** **Notification of Proper Persons in the Event of an Accident or Emergency** Submit operating and emergency procedures that include appropriate instructions for notifying the RSO and other personnel in the event of an accident or emergency. See Table 8-3.		[ ]
	Minimizing Exposure of Persons in the Event of an Accident or Emergency—Emergency Procedures Submit operating and emergency procedures that include instructions for minimizing exposure of persons in the event of an accident.		[ ]

Item No.	Title and Criteria	Yes	Description Attached
	Source Recovery (Retrieval) We will not perform sealed source recovery and will use the services of a person specifically licensed by the NRC or an Agreement State to perform the recovery of our sealed sources. **OR** Submit operating and emergency procedures that include instructions for sealed source recovery procedures and specific training.	[ ]	[ ]
	Maintenance of Records Submit operating and emergency procedures that ensure proper maintenance of records		[ ]
	10. Security Program Licensees must ensure the security and control of licensed material. In accordance with 10 CFR Part 37, "Physical Protection of Category 1 and Category 2 Quantities of Radioactive Material," licensees authorized to possess Category 1 or Category 2 quantities of radioactive material must establish, implement, and maintain a security program to ensure physical protection of the radioactive material.		Need Not Be Submitted With Application
11	**WASTE MANAGEMENT** **Disposal or Transfer of Radiography Sealed Sources Containing Byproduct Material or Devices Containing Depleted Uranium** The applicant does not need to provide a response to this item during the licensing process. However, the applicant should establish and include waste disposal procedures in its radiation safety program for the transfer or disposal of licensed material.	Need Not Be Submitted With Application	

Note: **Under 10 CFR Part 37, security plans are not to be submitted to the NRC for review and approval.**