



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

April 1, 2021

Bill Hunt, President
TERRADON Corporation
P.O. Box 519
Nitro, WV 25143

**SUBJECT: TERRADON CORPORATION, REQUEST FOR ADDITIONAL INFORMATION,
MAIL CONTROL NO. 624799**

Dear Mr. Hunt:

This is in reference to your letter dated February 18, 2021, requesting to amend NRC License No. 47-25539-01. You requested a change in Radiation Safety Officer (RSO) and change in locations of use and storage. In order to continue our review, we need additional information. The "Item" numbers below refer specifically to the item numbers in Appendix B to NUREG-1556, Volume 1, Revision 2, "Consolidated Guidance About Materials Licenses: Program-Specific Guidance About Portable Gauge Licenses, Final Report".

Your current license authorizes you for the following:

- 9 mCi of Cs-137 per source and 160 mCi of Cs-137 total (17.78 gauges)
- 44 mCi of Am-241/Be per source and 800 mCi of Am/Be total (18.18 gauges)

The issue comes from the nominal activity per source (8 mCi of Cs-137 per source, 44 mCi of Am-241/Be per source) vs maximum allowed activity per source (nominal +/- 10%). Our licenses list the maximum allowed activity per source.

Your renewal request stated you had 14 gauges, with a request to possess up to 20 gauges.

As such, please provide an updated request concerning the possession limits for your gauges:

- Request to reduce the possession limits to match the 14 gauges in your inventory
 - 9 mCi of Cs-137 per source and 126 mCi of Cs-137 total
 - 44 mCi of Am-241/Be per source and 616 mCi of Am/Be total
- Request to reduce the maximum number of gauges to 18 gauges allowed to most closely match the current limits
 - 9 mCi of Cs-137 per source and 162 mCi of Cs-137 total
 - 44 mCi of Am-241/Be per source and 792 mCi of Am/Be total
- Request to increase the maximum possession limits to match the original request to possess up to 20 gauges
 - 9 mCi of Cs-137 per source and 180 mCi of Cs-137 total
 - 44 mCi of Am-241/Be per source and 880 mCi of Am/Be total
- Request other maximum possession limits, if appropriate.

We will continue our review upon receipt of this information. Please reply to my attention at Jonathan.Pfingsten@nrc.gov.

In order to continue prompt review of your application, we request that you submit your response to this letter within 15 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. 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 me at 610-337-5170 or via electronic mail at Jonathan.Pfingsten@nrc.gov.

Thank you for your cooperation.

Sincerely,

Jonathan B. Pfingsten
Digitally signed by
Jonathan B. Pfingsten
Date: 2021.04.01
06:02:22 -04'00'

Jonathan Pfingsten, Health Physicist
Commercial, Industrial, R&D
and Academic Branch
Division of Nuclear Materials Safety
Region I

License No. 47-25539-01
Docket No. 030-35483
Mail Control No. 624799

cc: Brittany Beckwith, Project Designer

TERRADON CORPORATION, REQUEST FOR ADDITIONAL INFORMATION, MAIL CONTROL NO. 624799 DATED APRIL 1, 2021

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SUNSI Review Complete: Jonathan Pfingsten

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