

April 12, 2021

Licensing Assistance Team  
Division of Nuclear Materials Safety  
US Nuclear Regulatory Commission – Region 1  
2100 Renaissance Boulevard, Suite 100  
King of Prussia, PA 19406-2713

Re: Additional Information - Renewal of NRC License No. 37-17717-02  
MC 624834

Dear Mr. Pfingsten:

Please find below, the responses to requested information pursuant to your letter dated April 7, 2021:

1. Item 3 – Address Where Licensed Materials Will be Used or Possessed – The location you provided in Item 3 of your application dated March 3, 2021 is in the Agreement State jurisdiction of the State of Pennsylvania. Additionally, you did not request to utilize the licensed materials at temporary jobsites nationwide in NRC jurisdiction. Please confirm the following:

- a. Confirm that your location of use and storage in Ebensburg, PA is not in NRC jurisdiction and thus is not to be authorized specifically on your NRC license;

**L.R. Kimball confirms that use and storage in Ebensburg, PA is not in NRC jurisdiction and thus is not to be authorized on our NRC License.**

- b. Confirm that you are requesting authorization to use licensed materials at temporary jobsites 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.

**L.R. Kimball confirms that we are requesting authorization to use licensed materials at jobsites anywhere in the United States where the NRC maintains jurisdiction for regulating the use of licensed material, including areas of exclusive Federal jurisdiction within Agreement States.**

2. Information only, no response needed - Item 5 – Materials To Be Possessed and Proposed Uses – Your current amendment authorizes the possession and utilization of Troxler Electronic Laboratories Model No. 3411B gauges; however, your submittal on March 30, 2021, did not include a request to possess and utilize Troxler Electronic Laboratories Model No. 3411B gauges.

As discussed on the telephone on April 5, 2021, you no longer possess these gauges and are not seeking authorization to possess or utilize them at this time. However, the 3411B gauges are now approved under the Troxler Electronic Laboratories Model No. 3400 Series Sealed Source and Device (SSD) registration. As such, you will only need to request an adjustment in your Troxler Electronic Laboratories Model No. 3400 Series possession limits if you require approval for 3411B gauges in the future. No further information is needed on this specific model gauge at this time.

**Information is noted, and L.R. Kimball is in agreement.**

3. Item 5 – Materials To Be Possessed and Proposed Uses – Your renewal request dated March 30, 2021 contained a request to possess and utilize Troxler Electronic Laboratories Model No. 1351 gauges containing 8 mCi of Cs-137; however, this does not match the SSD registration for these gauges. The SSD registration authorizes three Cs-137 maximum source sizes:

- a. 5.5 mCi per source in the following sealed source models:
  - i. General Nuclear Inc. Model No. 2184
  - ii. Amersham Corporation Model No. CDCQ4431 and CDCW556
  - iii. U.S. Nuclear Corporation Model No. 373
- b. 9.0 mCi per source in Amersham Corporation Model No. CDCW556 sealed sources; AND
- c. 11.0 mCi per source in Amersham Corporation Model No. CDCW556 sealed sources

Please confirm the maximum activity per source, maximum number of gauges, and maximum possession limit of Cs-137 requested for possession and utilization in your Troxler Electronic Laboratories Model No. 1351 gauges.

L.R. Kimball currently owns ten (10) Troxler Model 1351 Depth Density Gauges. Each gauge has a Cesium 137 Source. They are Amersham Corp. Model No. CDCW556 with 9.0 mCi sources. Hence, maximum possession limit of Cs-137 is calculated to be 90 mCi.

4. Information only, no response needed – Your updated renewal request dated March 30, 2021 contained references to source models or drawing numbers under the column “Chemical and/or Physical Form”. We will be updating your license to reflect the SSD registrations for the individual gauge models and sources as appropriate. We will not be referencing the various drawing numbers. You do not need to provide a response to this item.

Information is noted, and L.R. Kimball is in agreement.

If you need further details and/or information, please feel free to contact me at your convenience. I can be reached at 814-419-7896 or via email at [bill.stenger@lrkimball.com](mailto:bill.stenger@lrkimball.com). Thank you for your assistance in this matter.

Sincerely,



William Stenger  
Director – Geosciences  
Radiation Safety Officer

WES

Enclosures

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