



May 3, 2021

United States Nuclear Regulatory Commission  
Division of Radiological Safety and Security  
Region I  
2100 Renaissance Boulevard  
King of Prussia, PA 19406  
Attention: Materials Licensing

Reference: Amendment Request for License #45-30874-01

Mr. Pfingsten,

This letter is in reference to your Request for Additional Information (RAI) dated April 30, 2021, regarding our previous letter requests for a license amendment dated February 24, 2021, and April 19, 2021, respectively.

As stated previously, we would like to request an increase to our maximum allowable nuclear material storage quantities on our current license. The current quantities listed are:

Cs 137 – 45 mCi Total  
Am 241 Be – 220 mCi Total

We have both Troxler 3400 series gauges and Troxler 4640-B gauges in our inventory that could be used within NRC jurisdiction at temporary jobsites. We anticipate that up to nine (9) Troxler 3400 series gauges and two (2) 4640-B gauges could potentially be active within NRC Jurisdiction at one time. The maximum activity for a Troxler 3400 series gauge for each radionuclide is 8 mCi (0.3 GBq) for the Cs 137 source, and 40 mCi for the Am 241 Be source; and the maximum activity for a Troxler 4640-B series gauge radionuclide is 8 mCi (0.3 GBq). Given the quantities stated above, and the maximum activity of each model, we formally request the following increase of our authorized allowable possession limit to the following total quantities:

CS 137 – 88 mCi Total  
Am 241 Be – 360 mCi Total

In response to your questions regarding the transfer of RSO duties from Mr. Kevin Kalb to Mr. Kenneth Tewalt, there was no lapse in coverage for the duties of RSO. Mr. Kalb is currently still employed with ECS; however, had an unexpected, extended leave of absence at the time you spoke with Mr. Tewalt. Mr. Kalb has returned to work as of April 27, 2021. Mr. Kalb was performing the RSO duties at the time of the initial letter request, dated February 24, 2021, as duties were transitioned to Mr. Tewalt during the month of March.

Mr. Tewalt has been employed by ECS since March 2015. He received his initial authorized user training on March 10, 2015. He has completed a refresher course each January following his

employment. In addition, he has completed the Troxler Nuclear Gauge Safety Certificate and HAZMAT online course on the same date as his RSO training, February 5, 2021. Please see the attached Authorized User Training certificates for the past three years, as well as Troxler training certificates for the RSO (#5B301A273D511BF8) and Nuclear Gauge Safety Certification (#ABA25F0E7F264F) training, as requested.

If you have any questions regarding the contents of this letter, or if there is need for further information, please contact us.

Sincerely,



Andrew R. Shontz, P.G.  
Vice President/Branch Manager

Enclosures

# Nuclear Gauge Safety Certification

This certifies that

**Kenneth Tewalt**

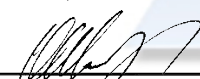
has successfully completed the official Troxler nuclear gauge user safety training course. This person was taught and demonstrated their knowledge of radiation safety and regulatory requirements associated with the use of portable nuclear density gauges on this date:

**Feb 05, 2021**

**This certificate is not valid until signed by the licensee RSO.**

I attest that the person named above, and no other, completed the online course and tests. I certify that the individual has completed practical skills training for setting up and making measurements, routine maintenance, packaging and transport, storage, and emergency procedures for portable nuclear gauges.

Licensee RSO

  
(Print Name)

Omer Duzyol

RSO

Title

05/03/2021

Date

Troxler Online Training meets the requirements in Chapter 64E, Part XIII, Florida Administrative Code.



Troxler Electronic Laboratories, Inc.  
P.O.BOX 12057 - 3008 E. Cornwallis Road - Research Triangle Park, NC 27709  
Phone:(919) 549-8661 - Fax: (919) 549-0761 - [www.troxlerlabs.com](http://www.troxlerlabs.com)



# *Hazmat Certification*

*as required by U.S DOT and IATA*

This certifies that

**Kenneth Tewalt**

has been trained and tested in accordance with the U.S. Department of Transportation and International Air Transport Association (IATA) hazardous material requirements for general awareness/familiarization, function-specific, safety and security awareness training as related to the transportation of nuclear gauges. A description of the training course materials is available from Troxler Electronic Laboratories, Inc.

Date **Feb 05, 2021** Expires **Feb 04, 2024**

## **EMPLOYER CERTIFICATION**

I certify that the hazmat employee identified on this certificate has been trained and tested as required by U.S. DOT Hazardous Material Regulations (49 CFR 172 Subpart H).

Signature  **Omer Duzyol** Title **RSO** Date **05/03/2021**



Troxler Electronic Laboratories, Inc.  
P.O.BOX 12057 - 3008 E. Cornwallis Road - Research Triangle Park, NC 27709  
Phone:(919) 549-8661 - Fax: (919) 549-0761 - [www.troxlerlabs.com](http://www.troxlerlabs.com)





# *ECS UNIVERSITY*

## *Radiation Safety Retraining*

### *Certificate of Completion*

*This is to certify that Kenneth Tewalt completed the Retraining Course on "Radiation Safety and Use of Nuclear Gauges" held on this Twenty Eight Day of January 2019 in the City of Chantilly, Commonwealth of Virginia by ECS Mid-Atlantic, LLC.*

#### Employer Certification

I certify that the hazmat employee identified  
On this certificate has been re-trained and tested  
As required by VDH Regulations 12VAC5-481.

  
Instructor

Omer M. Duzyol, R.S.O.

14026 Thunderbolt Place, Suite 100  
Chantilly, Virginia 20151  
Phone: 703-471-8400  
Fax: 703 – 834 – 5527

Expiration Date: January 28, 2020  
License Number: 45-24974-01  
107-314-1



# *ECS UNIVERSITY*

## *Radiation Safety Retraining*

### *Certificate of Completion*

*This is to certify that Kenneth Tewalt completed the Retraining Course on "Radiation Safety and Use of Nuclear Gauges" held on this Twenty Third Day of January 2020 in the City of Chantilly, Commonwealth of Virginia by ECS Mid-Atlantic, LLC.*

#### Employer Certification

I certify that the hazmat employee identified  
On this certificate has been re-trained and tested  
As required by VDH Regulations 12VAC5-481.

14026 Thunderbolt Place, Suite 100  
Chantilly, Virginia 20151  
Phone: 703-471-8400  
Fax: 703 – 834 – 5527

Expiration Date: January 23, 2021  
License Number: 45-24974-01  
107-314-1

  
Instructor

Omer M. Duzyol, R.S.O.

# Certificate Of Completion

We hereby award

**Kenneth Tewalt**

This certificate of completion for

**Radiation Safety for Chantilly Users Quiz**

on 01/15/2021 - 03:15 PM



---

---