



**L.P.C. & D., INC.**

P.O. Box 2025 Las Piedras, Puerto Rico 00771  
Tel. (787) 733-6121 Fax (787) 733-4808

April 12, 2021

U.S. Nuclear Regulatory Commission  
Division of Nuclear Materials Safety  
2100 Renaissance Boulevard, Suite 100  
King of Prussia, PA 19406-2713  
E-mail: [R1DNMSMAIL.RESOURCE@NRC.GOV](mailto:R1DNMSMAIL.RESOURCE@NRC.GOV)

**Re: L.P.C. & D. INC License Termination, Lic. # 52-25125-01**

Dear Sir:

This letter is to inform our decision of termination of the license. Today we complete all the transfers of all NUCLEAR GAUGES MACHINES with radioactive materials. We also include the forms NRC 314; certifications of disposition of materials are completed and signed.

If you need additional information feel free to contact us, at 787-607-3754

Cordially,  
L.P.C. & D., Inc.

Luis E. Rodriguez Arcelay, CE, PE

Cc: Pedro Feliciano Benitez, President

REC RG 10505-21 PM 1227



# CERTIFICATE OF DISPOSITION OF MATERIALS

Estimated burden per response to comply with this mandatory collection request: 30 minutes. This submittal is used by NRC as part of the basis for its determination that the facility is released for unrestricted use. 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 Infocollections.Resource@nrc.gov, and to the Desk Officer, Office of Information and Regulatory Affairs, NEOB-10202, (3150-0028), 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.

LICENSEE NAME AND ADDRESS

LPCED, INC  
P.O. Box 2025  
Las Piedras, PR. 00781

LICENSE NUMBER

52-25125-01

DOCKET NUMBER

030-31955

LICENSE EXPIRATION DATE

September 30, 2021

### A. LICENSE STATUS (Check the appropriate box)

This license has expired.  This license has not yet expired; please terminate it.

### B. DISPOSAL OF RADIOACTIVE MATERIAL

(Check the appropriate boxes and complete as necessary. If additional space is needed, provide attachments)

The licensee, or any individual executing this certificate on behalf of the licensee, certifies that:

- 1. No radioactive materials have ever been procured or possessed by the licensee under this license.
- 2. All activities authorized by this license have ceased, and all radioactive materials procured and/or possessed by the licensee under this license number cited above have been disposed of in the following manner:
  - a. Transfer of radioactive materials to the licensee listed below:  
EARTH ENGINEER, INC (TRANSFER LETTER ATTACHED) CPN - M381204756 (1)  
#Lic. 52-31427-01 CPN - M330701585 (2)
  - b. Disposal of radioactive materials:
    - 1. Directly by the licensee:
    - 2. By licensed disposal site:
    - 3. By waste contractor:
  - c. All radioactive materials have been removed such that any remaining residual radioactivity is within the limits of 10 CFR Part 20, Subpart E, and is ALARA.

### C. SURVEYS PERFORMED AND REPORTED

- 1. A radiation survey was conducted by the licensee. The survey confirms:
  - a. the absence of licensed radioactive materials
  - b. that any remaining residual radioactivity is within the limits of 10 CFR 20, Subpart E, and is ALARA.
- 2. A copy of the radiation survey results:
  - a. is attached; or  b. is not attached (Provide explanation); or  c. was forwarded to NRC on: \_\_\_\_\_ Date
- 3. A radiation survey is not required as only sealed sources were ever possessed under this license, and
  - a. The results of the latest leak test are attached; and/or
  - b. No leaking sources have ever been identified.

The person to be contacted regarding the information provided on this form:

NAME	TITLE	TELEPHONE (Include Area Code)	E-MAIL ADDRESS
Luis E. Rodriguez	ENGINEER	787-607-3754	LERAL66@GMAIL.COM

Mail all future correspondence regarding this license to:

### C. CERTIFYING OFFICIAL

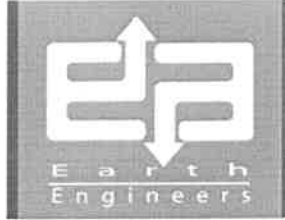
I CERTIFY UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT

PRINTED NAME AND TITLE	SIGNATURE	DATE
Pedro Feucianu Benitez - President	<i>[Signature]</i>	

WARNING: FALSE STATEMENTS IN THIS CERTIFICATE MAY BE SUBJECT TO CIVIL AND/OR CRIMINAL PENALTIES. NRC REGULATIONS REQUIRE THAT SUBMISSIONS TO THE NRC BE COMPLETE AND ACCURATE IN ALL MATERIAL RESPECT. 18 U.S.C. SECTION 1001 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.

**Earth Engineers, Inc.**

4 Terrazas de Carraízo  
San Juan, PR 00926



787-922-5579 (Mobile)  
787-755-9500 (office)  
info@eeipr.com  
marocho@eeipr.com

January 27, 2021

**Nuclear Materials Safety Branch**  
**U.S. Nuclear Regulatory Commission, Region-1**  
2100 Renaissance Boulevard, Suite 100  
King of Prussia, PA 19406-2713  
Tel. (610)-337-5364

To whom it may concern:

I hereby acknowledge that I received from Mr. Luis Rodríguez and Las Piedras Construction (LPC) Company, two (2) MC-1-DR-P PortaProbe CPN Density/Moisture gauges models. The NRC License number of Las Piedras Construction company is: 52-25430-01.

I received the gauges on mid-January in my storage facilities and headquarter; located on PR-843 km 1.5 Carraízo Ward, Trujillo Alto, Puerto Rico, 00976.

I currently operate my business Earth Engineers Inc.; under NRC license number #52-31427-01.

Respectfully submitted,  
EARTH ENGINEERS, INC.

A handwritten signature in black ink that reads 'Marcos O. Arocho Ramírez'.

Marcos O. Arocho Ramírez, P.E., RSO  
Geotechnical Engineer/President



## CERTIFICATE OF DISPOSITION OF MATERIALS

Estimated burden per response to comply with this mandatory collection request: 30 minutes. This submittal is used by NRC as part of the basis for its determination that the facility is released for unrestricted use. 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 [InfoCollect.Resource@nrc.gov](mailto:InfoCollect.Resource@nrc.gov), and to the Desk Officer, Office of Information and Regulatory Affairs, NE03-10202, (3150-0028), 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.

LICENSEE NAME AND ADDRESS

L.P.C.&D. Inc.  
P.O. Box 2025  
Las Piedras, PR 00771

LICENSE NUMBER

52-25125-01

DOCKET NUMBER

030-31955

LICENSE EXPIRATION DATE

February 28, 2021

**A. LICENSE STATUS (Check the appropriate box)**

- This license has expired.       This license has not yet expired; please terminate it.

**B. DISPOSAL OF RADIOACTIVE MATERIAL**

*(Check the appropriate boxes and complete as necessary. If additional space is needed, provide attachments)*

The licensee, or any individual executing this certificate on behalf of the licensee, certifies that:

- 1. No radioactive materials have ever been procured or possessed by the licensee under this license.
- 2. All activities authorized by this license have ceased, and all radioactive materials procured and/or possessed by the licensee under this license number cited above have been disposed of in the following manner:
  - a. Transfer of radioactive materials to the licensee listed below:  
CPN International a Division of Instrotek, Inc. ( see attached receipt)
  - b. Disposal of radioactive materials:
    - 1. Directly by the licensee:
    - 2. By licensed disposal site:
    - 3. By waste contractor:
  - c. All radioactive materials have been removed such that any remaining residual radioactivity is within the limits of 10 CFR Part 20, Subpart E, and is ALARA.

**C. SURVEYS PERFORMED AND REPORTED**

- 1. A radiation survey was conducted by the licensee. The survey confirms:
  - a. the absence of licensed radioactive materials
  - b. that any remaining residual radioactivity is within the limits of 10 CFR 20, Subpart E, and is ALARA.
- 2. A copy of the radiation survey results:
  - a. is attached; or  b. is not attached (Provide explanation); or  c. was forwarded to NRC on: \_\_\_\_\_ Date
- 3. A radiation survey is not required as only sealed sources were ever possessed under this license, and
  - a. The results of the latest leak test are attached; and/or
  - b. No leaking sources have ever been identified.

The person to be contacted regarding the information provided on this form:

NAME	TITLE	TELEPHONE (Include Area Code)	E-MAIL ADDRESS
David Rhoe	Consultant	(787) 245-7248	

Mail all future correspondence regarding this license to:

**C. CERTIFYING OFFICIAL**

I CERTIFY UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT

PRINTED NAME AND TITLE	SIGNATURE	DATE
Pedro Feliciano Benitez - President	<i>[Handwritten Signature]</i>	

**WARNING: FALSE STATEMENTS IN THIS CERTIFICATE MAY BE SUBJECT TO CIVIL AND/OR CRIMINAL PENALTIES. NRC REGULATIONS REQUIRE THAT SUBMISSIONS TO THE NRC BE COMPLETE AND ACCURATE IN ALL MATERIAL RESPECT. 18 U.S.C. SECTION 1001 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.**



CPN, Division of Instrotek, Inc.  
5052 Commercial Circle  
Concord, CA 94520 U.S.A.  
Ph: 925-363-9770  
[www.Instrotek.com](http://www.Instrotek.com)

## LETTER OF RECEIPT OF GAUGE/ SEALED SOURCE

To Radioactive Material Licensing Agencies: CPN International a Division of Instrotek, Inc. has taken possession of the following nuclear gauge(s). A certificate of leak test is on file.

Gauge Manufacturer	Model	Serial Number(s)	Nuclide	Nuclide Activity
CPN	MC -3	M320300766	Cesium-137 Americium-241	10mCi 50mCi
CPN	MC-3	M30069635	Cesium-137 Americium-241	10mCi 50mCi
CPN	MC-3	M351102935	Cesium-137 Americium-241	10mCi 50mCi

Gauge(s) Transferred From: \_\_\_\_\_

CRMI  
David Rhoe  
D-4 Tivoli St, Paseo De Las Fuentes  
Puerto Rico, 00926

Date Received: 3/25/2021

DocuSigned by:  
JENNIFER RICHARDSON  
Signature: 05EC3452E40C4FA

# INSTROTEK® COMPANIES



INSTROTEK • CPN • HMA • RAINHART

InstroTek, Inc.  
5052 Commercial Circle  
Concord CA 94520  
925-363-9770 Fax: 919-875-8328

David Rhoe  
CRMI (Rio Piedras)  
D-4 Pivoli St, Paseo De Las Fuentes  
Rio Piedras, PR 00926

Phone: 787-245-7248

## LEAK TEST CERTIFICATE InstroTek License #1100-07

This certifies that leak test analysis was conducted on the sample with the following information. The results shown below accurately represent the level of removable contamination.

Make: CPN  
Model: MC-1  
Serial Number: M320300766  
Date Swabbed: 3/2/2021

Source Type	Serial Number	Reading (uCi)
AmBe-241	0766	0
Cs-137	0766	0.00007

Note: 0.005 MicroCuries (185 Bq) or greater is considered a leaking source. The source(s) tested above may remain in use.

Reviewed by: *Jennifer Richardson* Print Date: 3/28/2021  
Customer Signature: \_\_\_\_\_ Date: \_\_\_\_\_

CPN gauges are 50 mCi Am241:Be and 10 mCi Cs-137. Humboldt gauges are 40 mCi Am241:Be and 10 mCi Cs-137. InstroTek Gauge is 40 mCi Am241:Be and 10 mCi Cs-137. Troxler gauges all, except 4640, are 40 mCi Am241:Be and 8 mCi Cs-137. Troxler 4640 is 8 mCi Cs-137. Refer to the manual for other products.

# INSTROTEK® COMPANIES



INSTROTEK • CPN • HMA • RAINHART

InstroTek, Inc.  
5052 Commercial Circle  
Concord CA 94520  
925-363-9770 Fax: 919-875-8328

David Rhoe  
CRMI (Rio Piedras)  
D-4 Pivoli St, Paseo De Las Fuentes  
Rio Piedras, PR 00926

Phone: 787-245-7248

## LEAK TEST CERTIFICATE InstroTek License #1100-07

This certifies that leak test analysis was conducted on the sample with the following information. The results shown below accurately represent the level of removable contamination.

Make: CPN  
Model: MC-1  
Serial Number: M15076239  
Date Swabbed: 3/28/2021

Source Type	Serial Number	Reading (uCi)
AmBe-241	6239	0
Cs-137	6239	0.00007

Note: 0.005 MicroCuries (185 Bq) or greater is considered a leaking source. The source(s) tested above may remain in use.

Reviewed by: *Jennifer Richardson* Print Date: 3/28/2021  
Customer Signature: \_\_\_\_\_ Date: \_\_\_\_\_

CPN gauges are 50 mCi Am241:Be and 10 mCi Cs-137. Humboldt gauges are 40 mCi Am241:Be and 10 mCi Cs-137. InstroTek Gauge is 40 mCi Am241:Be and 10 mCi Cs-137. Troxler gauges all, except 4640, are 40 mCi Am241:Be and 8 mCi Cs-137. Troxler 4640 is 8 mCi Cs-137. Refer to the manual for other products.

# INSTROTEK® COMPANIES



INSTROTEK • CPN • HMA • RAINHART

InstroTek, Inc.  
5052 Commercial Circle  
Concord CA 94520  
925-363-9770 Fax: 919-875-8328

David Rhoe  
CRMI (Rio Piedras)  
D-4 Pivoli St, Paseo De Las Fuentes  
Rio Piedras, PR 00926

Phone: 787-245-7248

## LEAK TEST CERTIFICATE InstroTek License #1100-07

This certifies that leak test analysis was conducted on the sample with the following information. The results shown below accurately represent the level of removable contamination.

Make: CPN  
Model: MC-1  
Serial Number: M351102935  
Date Swabbed: 3/28/2021

Source Type	Serial Number	Reading (uCi)
AmBe-241	2935	0
Cs-137	2935	0.00007

Note: 0.005 MicroCuries (185 Bq) or greater is considered a leaking source. The source(s) tested above may remain in use.

Reviewed by: *Jennifer Richardson* Print Date: 3/28/2021  
Customer Signature: \_\_\_\_\_ Date: \_\_\_\_\_

CPN gauges are 50 mCi Am241:Be and 10 mCi Cs-137. Humboldt gauges are 40 mCi Am241:Be and 10 mCi Cs-137. InstroTek Gauge is 40 mCi Am241:Be and 10 mCi Cs-137. Troxler gauges all, except 4640, are 40 mCi Am241:Be and 8 mCi Cs-137. Troxler 4640 is 8 mCi Cs-137. Refer to the manual for other products.