



**UNITED STATES
NUCLEAR REGULATORY COMMISSION**

REGION IV
1600 E. LAMAR BLVD
ARLINGTON, TX 76011-4511

June 29, 2021

David Torres
Radiation Safety Officer
Kakivik Asset Management, LLC
5020 Fairbanks Street
Anchorage, AK 99503

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION

Dear Mr. Torres:

The Nuclear Regulatory Commission (NRC) has reviewed your response letter dated June 4, 2021 and additional information is still needed. Please correct the deficiencies and submit the requested information within 30 days of receipt of this letter. Make reference to mail control number 624678 in your response. We will assume that you do not wish to further pursue this licensing action if we do not receive a reply within the specified timeframe noted above.

1. The dose limit to members of the public in unrestricted areas shall not exceed 2 millirem in any one hour in accordance with 10 CFR 20.1301. Provide calculated exposure rate for all the locations A1C through C8N in unrestricted areas to demonstrate that exposure rates will not exceed 2 millirem in any one hour. A deviation from this requirement is allowed for measurements at the roof as shown below.
2. If the exposure rate measurements at the roof of the container will exceed 2 millirem in any one hour, 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 millirem in any one hour.
 - A. means of preventing access to the roof
 - B. procedures for ensuring that no individual is on the roof or could gain access to the roof during radiography
 - C. a commitment that the roof will be posted with "Caution (or Danger) Radiation Area" sign(s)
 - D. steps taken to minimize radiation on the roof
 - E. 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

3. In addition to item 2, provide the following information to obtain approval for a variance if radiation levels on the radiographic installation roof exceed 100 mrem in any one hour.
 - A. a commitment that the roof will be posted with a “Caution (or Danger) High-Radiation Area” sign(s)
 - B. evidence of constant surveillance of the roof by closed-circuit television
 - C. a description of a control device that would automatically reduce the radiation level to 100 mrem in any one hour at 30 centimeters from the radiation source if someone enters the roof
 - D. 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

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 www.nrc.gov/reading-rm/adams.html.

Thank you for your cooperation.

Sincerely,

Roberto J. Torres, M.S., Senior Health Physicist
Materials Licensing and Decommissioning Branch

Docket: 030-35371
License: 50-27667-01
Control: 624678