



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

August 20, 2021

Philip C. Palilla, Owner, RSO  
Q/C Resource Technical Services  
3 Simm Lane  
Newtown, CT 06470

**SUBJECT: Q/C RESOURCE TECHNICAL SERVICES, REQUEST FOR ADDITIONAL  
INFORMATION, MAIL CONTROL NO. 627118**

Dear Mr. Palilla:

This is in reference to your application dated May 24, 2021, requesting to renew NRC License No. 06-30610-01. Please note that several items below refer to NUREG-1556, Volume 18, Revision 1, which can be found online at: <https://www.nrc.gov/reading-rm/doc-collections/nuregs/staff/sr1556/v18/index.html>. In order to continue our review, we need the following additional information:

1. Your present license authorizes the possession and storage of the Seaman Nuclear Corporation Model No. C-300, however your license renewal did not include this authorization in the list of requested materials and devices. Based on the phone call conducted on August 20, 2021, Q/C Resource Technical Resources never possessed a gauge of this description, and therefore no response is necessary to this item.
2. Your renewal application requested the following uses for the sealed sources: transportation, packaging, leak test acquisition, calibration of portable gauges, routine and nonroutine maintenance, instruction of clients, repair of devices (limited to the cleaning of the source rod and excluding the opening or manipulation of the source or source rod), as well as for the purposes of density and moisture density. No response is necessary to this item unless the above list is inaccurate. (reference NUREG-1556, Volume 18, Revision 1, Section 8.6.1)
3. Regarding Item 8.6 "Purpose(s) For Which Licensed Materials Will Be Used," NUREG-1556, Volume 18, Revision 1, Section 1 splits licensed activities for service providers into categories of "high risk" and "low risk" for the purposes of Section 9 "Facilities And Equipment" and Section 10.1 "Operating and Emergency Procedures." The requested authorized activities that the NRC understands you are requesting are covered in Item No. 2 of this letter include several items that are explicitly called out as "high risk" activities, such as the service or repair of portable nuclear gauges that involve the removal of the source or source rod (i.e. nonroutine maintenance). Please either:
  - a. Revise or otherwise clarify your request for authorizations (in accordance with Item No. 2 of this letter) to remove activities corresponding to "high risk" activities covered in Chapter 1 of NUREG-1556, Volume 18, Revision 1.

- b. Provide the additional information noted in Section 9 “Facilities and Equipment” and Section 10.1 “Operating and Emergency Procedures” for the activity or activities identified in Chapter 1 of the NUREG that you wish to be authorized for. Given the type of activity we understand you are requesting that qualifies as “high risk,” (the repair/nonroutine maintenance of portable gauges) please ensure the provided information covers the information noted in with NUREG-1556, Volume 1, Revision 2, Appendix F “Information Needed to Support Applicant’s Request to Perform Nonroutine Maintenance.” This NUREG can be found at <https://www.nrc.gov/reading-rm/doc-collections/nuregs/staff/sr1556/v1/index.html>.
4. Please note that several of your commitments were referencing NUREG-1556, Volume 18, which was revised in August 2017. As a result, there are new or updated commitments that are needed to continue our review. You may choose to go through the list below, or alternatively review and complete the checklist found in NUREG-1556, Volume 18, Revision 1, Appendix B.
- a. Regarding Item 7 “Individuals Responsible For Radiation Safety Program And Their Training Experience:”
- i. “Authorized Users and Radiation Workers,” please select one of the following:
- Before using licensed material, authorized users will receive the training described in Appendix D of NUREG–1556, Volume 18, Revision 1, ‘Consolidated Guidance About Materials Licenses: Program-Specific Guidance About Service Provider Licenses.’*
- OR
- Provide a description of the training and experience for proposed authorized users and a description of the radiation safety training involving the use of licensed materials that will be provided as a service to customers, if training is provided by the service provider.
- OR
- If there will be no further authorized users, you may commit to having no further authorized users and provide no further information regarding this section.
- ii. “Training for Individuals Working In or Frequenting Restricted Areas,” please select one of the following:
- Before working in the vicinity of licensed materials, personnel will have successfully completed training commensurate with assigned duties.*
- OR
- Provide a description of the radiation safety training program, including topics covered, groups of workers, assessment of training, qualifications of instructors, and the method and frequency of refresher training.
- OR
- If there will be no further individuals that will meet this criteria, you may commit to ensuring no other individuals will work in or frequent restricted areas and provide no further information regarding this section.

- b. Regarding Item 10.2 “Material Receipt and Accountability,” NUREG-1556, Volume 18, Revision 1, no longer contains model procedures. As a result, please update your commitment to the following:

*“We will develop, implement, and maintain procedures for ensuring accountability of licensed materials at all times.”*

AND EITHER:

*“Physical inventories will be conducted at intervals not to exceed 6 months, to account for all sealed sources and devices received and possessed under the license. Records of inventory will be maintained for a period of 5 years from the date of each inventory, and will include the radionuclides, quantities, manufacturer’s name and model numbers, and the date of the inventory.”*

OR

Provide a description of the procedures for ensuring that no sealed sources have been lost, stolen, or misplaced.

- c. Regarding Item 10.3 “Radiation Monitoring Instruments,” please update your commitment to:

*We will use instruments that meet the radiation monitoring instrument specification published in Appendix F of NUREG–1556, Volume 18, Revision 1, ‘Consolidated Guidance About Materials Licenses: Program-Specific Guidance About Service Provider Licenses.’ We reserve the right to upgrade our survey instruments as necessary.*

AND

Verify the possession of at least one survey instrument meeting the criteria listed in NUREG-1556, Volume 1, Revision 2, Appendix F.

- d. Regarding Item 10.6 “Occupational Dose,” please update to the following:

*We will have a prospective evaluation and determine that unmonitored individuals are not likely to receive, in one year, a radiation dose in excess of 10% of the allowable limits in 10 CFR Part 20, or we will monitor individuals in accordance with the criteria in Section 8.10.6 ‘Radiation Safety Program: Occupational Dose’ in NUREG-1556, Volume 18, Revision 1, “Consolidated Guidance About Materials Licenses: Program-Specific Guidance About Service Provider Licenses.”*

5. Your present license authorizes your activities at temporary job sites where the NRC maintains its jurisdiction. Given your requests and presently authorized activities your license will be renewed with this authorization. No response is necessary for this item.
6. Regarding Item No. 11 “Waste Management,” your application states that all of the options in NUREG-1556, Volume 18, Revision 0, Appendix B options under Item 10 “Waste Management” are not applicable. Please provide a description of why, for the activities you are being authorized for, all selections are not applicable.

We will continue our review upon receipt of this information. Please reply to the attention of:

Jason vonEhr  
Mail Control No. 627118  
USNRC, Region I  
Division of Radiological Safety and Security  
2100 Renaissance Boulevard  
King of Prussia, PA 19406

Or

[R1DRSSMail.Resource@nrc.gov](mailto:R1DRSSMail.Resource@nrc.gov)

Reference – Jason vonEhr

Mail Control No. 627118

In order to continue prompt review of your application, we request that you submit your response to this letter within 30 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](http://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 and Procedure," 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 Mr. vonEhr at (610) 337-5256 or via electronic mail at [Jason.vonEhr@nrc.gov](mailto:Jason.vonEhr@nrc.gov).

Thank you for your cooperation.

Sincerely,

Betsy Ullrich, Senior Health Physicist  
Commercial, Industrial, R&D  
and Academic Branch  
Division of Radiological Safety and Security  
Region I

License No. 06-30610-01  
Docket No. 030-35611  
Mail Control No. 627118

Q/C RESOURCE TECHNICAL SERVICES, REQUEST FOR ADDITIONAL INFORMATION,  
MAIL CONTROL NO. 627118 DATED AUGUST 20, 2021

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**SUNSI Review Complete: JEV1**

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NAME	Jason vonEhr		Betsy Ullrich					
DATE	08/20/2021 JEV		8/20/21 exu					

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