

October 18, 2021



Mr. Jason M. Kelly, MPH
Materials and Licensing for Portable Nuclear Density Gauges
United States Nuclear Regulatory Commission
U.S. NRC Region III
2443 Warrenville Road
Suite 210
Lisle, Illinois 60532-4352

**Re: Response to NRC Letter Dated October 5, 2021 Referencing GEI Consultants
Amendment Letter Dated August 12, 2021**

Dear Mr. Kelly:

The purpose of this letter is to answer questions regarding the Addendum dated August 12, 2021, to remove the locations of 925. W. Washington St. Marquette, Michigan and Counce, Tennessee from GEI Consultants, Inc. (GEI) NRC License 21-32834-01.

Question #1

“Submit records of the completed transfer and/or disposal for all sealed sources or portable gauging devices previously stored at the former locations. If transferred outside of your organization, please provide a copy of the transferee’s license and a letter confirming receipt of the transferred portable gauging devices”

Attached to the amendment request letter were leak test results from the portable devices previously stored at the former permanent storage locations. The portable gauging devices were kept within the company. The location of 925 W. Washington St. Marquette, Michigan was the former GEI Consultants (GEI) office, and all gauges were transferred to the current office location of 109 W. Baraga Ave, Marquette, Michigan in June 2014. The Counce, Tennessee location was a former project site. Upon completion of the onsite project use, the portable gauging device was transferred to GEI’s Green Bay office in 2020. The transfer paperwork is attached to this letter.

Question #2

“Describe any incidents involving ruptured, leaking or lost sealed sources or portable gauging devices along with any other incidents involving radioactive materials at the former permanent storage locations.”

I became the RSO for GEI’s Marquette office in 2021. As stated above, the portable gauging devices were transferred from GEI’s 925 W. Washington St., Marquette, Michigan address to the new address of 109 W. Baraga Ave, Marquette, Michigan in 2014, and the portable gauging device was transferred from Counce, Tennessee to GEI’s Green Bay, Wisconsin office in 2020. To my knowledge and upon reviewing previous leak test results; no incidents occurred at either location involving ruptured, leaking, or lost portable gauging devices. Also, to my knowledge, no other incidents occurred involving radioactive material at the former permanent storage locations.

If you have any additional questions, please contact Isaac Roberts at (906) 629-1377.

Sincerely,

GEI CONSULTANTS, INC.



Isaac N. Roberts, P.E.
Senior Project Engineer / RSO



Chris R. Abraham, P.E.
Branch Manager

Attachments:

2020 Portable Nuclear Density Gauge Transfer Form

GEI Consultants
Portable Nuclear Density Gauge
Transfer Form



3159 Voyager Dr
Green Bay, WI 54311

Type of Transfer

Transfer of Ownership GEI Office Transfer Disposal

Transferee Information

Transferee: GEI Consultants, Inc.
Kevin Dady

License No. _____
Telephone No. 781-721-4027

Comments:
Transferred Gauge ownership to Green Bay WI office

Device Information

Model No. <u>TROXLER 3440+</u>	<u>Cs-137</u>	<u>Radionuclide</u>	<u>Am-241:Be</u>
	8 mCi	<u>Activity</u>	40 mCi
Serial No. <u>75608</u>	50-6766	<u>Source S/N</u>	47-12812
	1/4/2021	<u>Date of Activity Measured</u>	1/4/2021
	1/4/2021	<u>Leak Test Date</u>	1/4/2021

Recipient

To: Company GEI Consultants, Inc.
License No. 009-1412-01
Street Address 3159 Voyager Drive
City and State Green Bay, WI
Zip Code 54311
Telephone 920-471-0295

Recipient Dan Braatz, RSO
(Print Name and Title)

Sign Upon Receipt *Dan Braatz* Date 7/16/2020
(Signature)

Comments or Remarks

GEI Consultants, Inc. office 4100 (Boston) transferred gauge #75608 Ownership to the Green Bay office (4100) of GEI Consultants,

From: [Kelly, Jason](#)
To: [Pavon, Sandy](#)
Cc: [Pavon, Martha](#)
Subject: FW: RE: U.S. NRC Materials License No. 21-32834-01
Date: Tuesday, October 19, 2021 7:35:51 AM
Attachments: [NRC Amendment Response Letter FINAL.pdf](#)
[Form 665 \(Additional Information - 10-18-2021\).pdf](#)

Sandy,

Good morning again.

Attached is an incoming response letter providing Additional Information for Materials License No. 21-32834-01 (GEI Consultants, inc.), Docket No. 030-38491 for Control No. 628183. I have also attached a Form 665.

Jason M Kelly, MPH
Health Physicist
U.S. NRC Region III – DNMS MLB
Phone: (630) 829-9737
E-mail: Jason.Kelly@nrc.gov

From: Roberts, Isaac <iroberts@geiconsultants.com>
Sent: Monday, October 18, 2021 1:10 PM
To: Kelly, Jason <Jason.Kelly@nrc.gov>
Cc: Abraham, Chris <cabraham@geiconsultants.com>
Subject: [External_Sender] RE: U.S. NRC Materials License No. 21-32834-01

Hello Mr. Kelly,

Please find attached Amendment Response letter to answer your questions regarding GEI's Amendment Request Dated August 12, 2021.

If you have any additional questions or need any additional information; please do not hesitate to contact me.

Thank you,
Isaac

GEI50

ISAAC N. ROBERTS, PE
Senior Engineer
906.629.1377 cell: 906.360.0808
109 W. Baraga Avenue, Marquette, MI 49855



From: Kelly, Jason <Jason.Kelly@nrc.gov>
Sent: Tuesday, October 5, 2021 12:58 PM
To: Roberts, Isaac <iroberts@geiconsultants.com>
Subject: [EXT] U.S. NRC Materials License No. 21-32834-01

EXTERNAL EMAIL

Mr. Roberts:

I have reviewed the amendment request dated August 12, 2021. Attached is a letter requesting additional information dated October 5, 2021, with a response requested by October 20, 2021.

Please confirm that you have received this e-mail and were able to access the attached file. You will not receive a hardcopy of this request due to the ongoing COVID-19 Public Health Emergency.

Jason M. Kelly, MPH
Health Physicist
Materials Licensing Branch
U.S. Nuclear Regulatory Commission
Region III
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Lisle, IL 60532-4352
Office: (630) 829-9737
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<http://www.nrc.gov/>

“America was not built on fear. America was built on courage, on imagination and an unbeatable determination to do the job at hand.” - Harry S. Truman