



# Suelos, PSC.

Soil & Construction Materials Laboratory and Environmental Drilling Services

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August 16, 2021

**UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
REGION 1  
2100 Renaissance BLVD.  
King of Prussia, PA, 19406-2713**

**Attention: Jonathan B. Pfungsten  
Health Physicist, Commercial  
Industrial, R&D, and Academic Branch  
Division of Radiological Safety and Security, Region 1**

Dear Mr. Pfungsten:

Responding to our telephone conversation on August 12, 2021, we are requesting a change of name from **Soil & Materials, Inc** to **Suelos, PSC.** at P.O. Box 10208 San Juan PR 00922-0208.

Our organization has been doing work under both names for 31 years (since 1990). We are requesting a change of name and not a change of ownership, since the ownership has not changed.

Regarding Form 313 and the supporting information for Items 5-11 from the NUREG-1556, Vol. 1, Revision 2: "Consolidated Guidance About Materials Licenses", we are currently filling Items 5 through 11. These items will follow shortly.

Thanks for your assistance,

Respectfully submitted,

**Carlos Rodriguez Molina PE, PG, MA  
President of Suelos, PSC.**

The following is based on Portable Gauge Licenses, NUREG 1556 Vol 1, November 2001, Appendix B

Item 5 and 6: Materials to be Possessed and Proposed Uses

Radioisotope	Manufacturer	Quantity	Use as Listed on SSD Certificate	Other Uses Not Listed on SSD Certificate
Cs-137	Sealed Sources CPN Model CPN-131	No single source to exceed the maximum activity per device as specified in Sealed Source and Registration Certificate.  70 mCi total	Yes	Not Applicable
Am-241	Sealed Sources CPN Model CPN-131	No single source to exceed the maximum activity per device as specified in Sealed Source and Registration Certificate.  350 mCi total	Yes	Not Applicable
Ra-226	Sealed Sources Radium Chemical Company Model RAN-W25, DWG. No. 21.94; QSA Global model Ran.C1	No single source to exceed the maximum activity per device as specified in Sealed Source and Registration Certificate.  9 mCi total	Yes	Not Applicable

In CPN International Model MC Series and Instro Tek Model 3500, Smart MC, MC3 Elite gauging devices for measuring physical properties of materials.

Items 7 through 11: Training and Experience, Facilities and Equipment, Radiation Safety Program, and Waste Disposal

Item No. and Title	Suggested Response	Yes	Alternative Procedures Attached
<p>7. <b>INDIVIDUAL(S) RESPONSIBLE FOR RADIATION SAFETY PROGRAM AND THEIR TRAINING AND EXPERIENCE— RADIATION SAFETY OFFICER</b>  <i>Carlos Rodriguez</i>            Name: <u>Molina</u></p>	<p>Documentation demonstrating the proposed radiation safety officer's training and experience (e.g., certificate of completion of the RSO's course and/or the authorized user's course).</p> <p><i>Currently Listed on License</i></p>	<p>Submit applicable documentation.</p>	
<p>8. <b>TRAINING FOR INDIVIDUALS WORKING IN OR FREQUENTING RESTRICTED AREAS</b></p>	<p>Before using licensed materials, authorized users will have successfully completed one of the training courses described in the "Criteria" part of the section titled, "Training for Individuals Working in or Frequenting Restricted Areas" in NUREG-1556, Vol. 1, Rev. 2, "Consolidated Guidance About Materials Licenses: Program-Specific Guidance About Portable Gauge Licenses."</p>	<p><input checked="" type="checkbox"/></p>	<p><input type="checkbox"/></p>
<p>9. <b>FACILITIES AND EQUIPMENT</b></p>	<p>Provide a facility diagram for each permanent portable gauge storage location. Include on the diagram the use of adjacent areas (including above and below), and information relevant to public dose and security as discussed in Sections 8.10.5, "Public Dose," and 8.10.6, "Operating, Emergency, and Security Procedures," respectively, in NUREG-1556, Vol. 1, Rev. 2, "Consolidated Guidance About Materials Licenses: Program-Specific Guidance About Portable Gauge Licenses"</p>	<p>Submit applicable documentation.</p>	

Item No. and Title	Suggested Response	Yes	Alternative Procedures Attached
10.1 RADIATION SAFETY PROGRAM—AUDIT PROGRAM	The applicant should not submit its audit program to the NRC for review during the licensing phase. The audit program will be reviewed during NRC inspections.	Need Not Be Submitted with Application	
10.2 RADIATION SAFETY PROGRAM—RADIATION MONITORING INSTRUMENTS	We will either possess and use, or have access to and use, a radiation survey meter that meets the criteria in the section titled, "Radiation Safety Program—Radiation Monitoring Instruments" in NUREG-1556, Vol. 1, Rev. 2, "Consolidated Guidance About Materials Licenses: Program-Specific Guidance About Portable Gauge Licenses," in the event of an incident.	<input checked="" type="checkbox"/>	<input type="checkbox"/>
10.3 RADIATION SAFETY PROGRAM—MATERIAL RECEIPT AND ACCOUNTABILITY	Physical inventories will be conducted every 6 months or at other intervals approved by the NRC to account for all sealed sources and devices received and possessed under the license.  AND We will develop, implement, and maintain procedures for ensuring accountability of licensed materials at all times.	<input checked="" type="checkbox"/>	<input type="checkbox"/>
10.4 RADIATION SAFETY PROGRAM—OCCUPATIONAL DOSE	We will maintain, for inspection by the NRC, documentation demonstrating that unmonitored individuals are not likely to receive a radiation dose in excess of the limits in 10 CFR 20.1502(a).  OR We will provide and require the use of individual monitoring devices (dosimetry). All personnel dosimeters that require processing to determine the radiation dose will be processed and evaluated by a NVLAP-approved processor.	<input type="checkbox"/>  <input checked="" type="checkbox"/>	<input type="checkbox"/>

Item No. and Title	Suggested Response	Yes	Alternative Procedures Attached
10.5 RADIATION SAFETY PROGRAM—PUBLIC DOSE	The applicant is <i>not</i> required to submit a response to the public dose section in a license application. This matter will be examined during NRC inspections.	Need Not Be Submitted with Application	
10.6 RADIATION SAFETY PROGRAM—OPERATING, EMERGENCY, AND SECURITY PROCEDURES	<p>We will implement and maintain the operating, emergency, and security procedures in Appendix G to NUREG-1556, Vol. 1, Rev. 2, "Consolidated Guidance About Materials Licenses: Program-Specific Guidance About Portable Gauge Licenses." Copies of these procedures will be provided to all gauge users and will be available at each jobsite.</p> <p>OR</p> <p>Operating, emergency, and security procedures will be developed, implemented, and maintained and will meet the criteria in section 8.10.6, "Radiation Safety Program—Operating, Emergency, and Security Procedures," NUREG-1556, Vol. 1, Rev. 2, "Consolidated Guidance About Materials Licenses: Program-Specific Guidance About Portable Gauge Licenses." Copies of these procedures will be provided to all gauge users and will be available at each jobsite.</p>	<input checked="" type="checkbox"/>  <input type="checkbox"/>	<input type="checkbox"/> For this item, checking this box indicates that alternative procedures will be provided as part of the application and that these procedures will be provided to all gauge users and will be available at each jobsite.

Item No. and Title	Suggested Response	Yes	Alternative Procedures Attached
<b>10.7 RADIATION SAFETY PROGRAM—LEAK TEST</b>	<p>Leak tests will be performed at intervals approved by the NRC or an Agreement State and specified in the SSD registration certificate. Leak tests will be performed by an organization licensed by the NRC or an Agreement State to provide leak testing services to other licensees; or by using a leak test sample collection kit supplied by an organization licensed by the NRC or an Agreement State to provide leak test kits and/or sample analysis services to other licensees and according to the kit supplier's instructions. Records of leak test results will be maintained.</p> <p style="text-align: center;">OR</p> <p>We will implement the model leak test program published in Appendix I of NUREG-1556, Volume 1, Revision 2, "Consolidated Guidance About Materials Licenses: Program-Specific Guidance About Portable Gauge Licenses." Records of leak tests will be maintained.</p>	<p style="text-align: center;"><input checked="" type="checkbox"/></p> <p style="text-align: center;"><input type="checkbox"/></p>	<p><input type="checkbox"/> For this item, checking this box indicates that alternative equipment and/or procedures will be provided as part of the application and that records of leak tests will be maintained.</p>

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Item No. and Title	Suggested Response	Yes	Alternative Procedures Attached
<b>10.8 RADIATION SAFETY PROGRAM— MAINTENANCE</b>	<p><i>Routine Cleaning and Lubrication</i> We will implement and maintain procedures for routine maintenance of our gauges according to each manufacturer's written recommendations and instructions.</p> <p><i>Nonroutine Maintenance</i> The gauge manufacturer or other person licensed by the NRC or an Agreement State will perform nonroutine maintenance or repair operations that require detaching the source or source rod from the gauge.</p>	<input checked="" type="checkbox"/>          <input checked="" type="checkbox"/>	<input type="checkbox"/>          <input type="checkbox"/> The information listed in Appendix F of this NUREG supporting a request to perform nonroutine maintenance in house is attached.
<b>10.9 RADIATION SAFETY PROGRAM— TRANSPORTATION</b>	The applicant is <i>not</i> required to submit a response about transportation during the licensing process. The NRC will review this issue during inspection.	Need Not Be Submitted with Application	
<b>11. WASTE MANAGEMENT— GAUGE DISPOSAL AND TRANSFER</b>	The applicant is <i>not</i> required to submit a response about waste management during the licensing process; however, the licensee should establish and include gauge transfer and waste disposal procedures in its radiation safety program.	Need Not Be Submitted with Application	