



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555-0001

January 25, 2022

Mr. Michael Phillips  
President/CEO  
ChemPro Technologies Inc.,  
dba Environics USA  
1107 Wonder St. Ste 103  
Round Rock, TX 78681

SUBJECT: CHEMPRO TECHNOLOGIES INCORPORATED, DBA ENVIRONICS USA,  
REQUEST FOR ADDITIONAL INFORMATION

Dear Mr. Phillips:

This letter is in response to your amendment requests dated November 29, 2021, requesting amendments to your Exempt Distribution License (E-License) 42-35292-01E and Sealed Source and Device (SSD) Registration Certificate NR-1417-D-101-E.

We do not have sufficient information to complete the review of your application. In the enclosure to this letter, you will find the list of the questions and items not addressed in your application.

Please be aware that upon your request, proprietary information submitted to the U.S. Nuclear Regulatory Commission (NRC) may be withheld from public disclosure. To do this, you must follow the procedures in Title 10 of the *Code of Federal Regulations* (10 CFR) Paragraph 2.390(b) including requesting withholding at the time the information is submitted and complying with the document marking and affidavit requirements set forth in 10 CFR 2.390(b)(1).

We will continue our review upon receipt of this information. If we do not receive your reply within 30 calendar days from the date of this letter, we will consider your application as having been abandoned by you. This action would be without prejudice to the resubmission of another application with the required information.


In accordance with 10 CFR Section 2.390 of the NRC's "Agency 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 Publicly Available Records component of NRC's Agencywide Documents Access and Management System (ADAMS). ADAMS is accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html>.

Any correspondence regarding your amendment application should reference mail control number 629364.

If you have any questions regarding your SSD Registration Certificate, please contact Joseph Rolland at (301) 415-4059, or by e-mail at [Joseph.Rolland@nrc.gov](mailto:Joseph.Rolland@nrc.gov). If you have any questions regarding your E-License, please contact Shirley Xu at (301) 415-7640, or by e-mail at [Shirley.Xu@nrc.gov](mailto:Shirley.Xu@nrc.gov).

Sincerely,

Shirley S. Xu  
Materials Safety Tribal and Liaison Branch  
Division of Materials Safety, Security, State,  
and Tribal Programs  
Office of Nuclear Material Safety  
and Safeguards

 Digitally signed by Shirley S. Xu  
Date: 2022.01.25 14:12:12 -05'00'

Docket No. 030-38904  
License No. 42-35292-01E

Enclosure:  
Request for Additional Information

M. Phillips

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SUBJECT: CHEMPRO TECHNOLOGIES INCORPORATED, DBA ENVIRONICS USA,  
REQUEST FOR ADDITIONAL INFORMATION

DATED: January 25, 2022

ADAMS ACCESSION NO.: ML21336A559 (pkg.) ML22020A010 (Letter & Enclosure)

\*Concurrence Via email

OFFICE	MSST/MSTB	MSST/MSTB	MSST/MSTB	MSST/MSTB
NAME	SXu	TBrockington	JRolland	THerrera
DATE	1/19/2022	1/20/2022	1/20/2022	1/20/2022
OFFICE	MSST/MSTB	MSST/MSTB		
NAME	LSepulveda	SXu		
DATE	1/24/2022	1/25/2022		

OFFICIAL RECORD COPY

**CHEMPRO TECHNOLOGIES INC., DBA ENVIRONICS USA  
AMENDMENTS DATED NOVEMBER 29, 2021**

The U.S. Nuclear Regulatory Commission (NRC) staff has reviewed the ChemPro Technologies Inc., dba Environics USA (ChemPro) amendment request dated November 29, 2021, and determined that additional information is needed. In order to continue with our review, please address the issues listed below. This information is required by Title 10 of the *Code of Federal Regulations* (10 CFR) Sections 32.26 and 32.210 and described in the relevant guidance document NUREG-1556, Volume 3, Revision 2, titled "Applications for Sealed Source and Device Evaluation and Registration."

**Questions for Sealed Source and Device (SSD) Registration Certificate NR-1417-D-101-E**

1. Please indicate if there have been changes made to the design of the ChemProX to accommodate the NI3VZ40712432U source.
2. Please identify the SSD registration certificate for the model NI3VZ40712432U source containing nickel-63. If the sealed source does not have a separate registration certificate the source may be registered as part of the device. For a source to be registered as part of a device, you must submit enough information for NRC Staff to perform a complete evaluation of the sealed source. This would include the sealed source model designation, a complete description of the sealed source including assembly methods, engineering drawings, prototype testing results, etc. Please submit the source information.
3. Please indicate if the models AMM and NI3VZ40712432U are identical, if not please provide a detailed list of the differences.
4. Please indicate whether the inclusion of the new nickel-63 source will have an effect on the working life of the device.

**Questions for Exempt Distribution License No. 42-35292-01E, for using the NI3VZ40712432U source**

5. Provide maximum external radiation levels at 5 and 25 centimeters from any external surface of the product, averaged over an area not to exceed 10 square centimeters, and the method of measurement.
6. Provide the estimated external radiation doses and dose commitments relevant to the safety criteria in 10 CFR 32.27 and the basis for such estimates alongside a determination that the probabilities with respect to the doses referred to in 10 CFR Paragraph 32.27(c) meet the criteria of that paragraph.
7. Please indicate any changes made to ChemPro's Quality Assurance and Control program. Specifically, please confirm that the Quality Assurance and Control Program has been modified to include the new source manufacturer. Please provide an updated copy. If no changes were made, please explain why.

Enclosure