



UNITED STATES  
NUCLEAR REGULATORY COMMISSION

REGION III  
2443 WARRENVILLE RD. SUITE 210  
LISLE, IL 60532-4352

February 23, 2022

Jeffrey A. Blum  
Radiation Safety Officer  
Weaver Consultants Group  
400 Ann St. NW, Ste. 201A  
Grand Rapids, MI 49504

Dear Mr. Blum:

I am reviewing your application received on October 26, 2021, in which you requested the renewal of U.S. Nuclear Regulatory Commission (NRC) Materials License No. 21-32761-01.

The NRC's guidance document for your proposed type of license, which I refer to below as "the guidance", is NUREG-1556, Volume 1, Rev. 2, dated June 2016, "Consolidated Guidance About Materials Licenses - Program Specific Guidance About Portable Gauge Licenses." This guidance is available on the NRC Web site at:

<https://www.nrc.gov/docs/ML1617/ML16175A375.pdf>

Upon review of your application, I identified the following areas requiring additional or clarifying information:

1. Section 8.2, "Item 2: Name and Mailing Address of Applicant," indicates that the legal name of the applicant's corporation or other legal entity be identified in the license application.

Your application identifies your company's legal name as *WEAVER CONSULTANTS GROUP*. A recent check with the Michigan Department of Licensing and Regulatory Affairs' Corporations Division was not successful in confirming your company's registration as *WEAVER CONSULTANTS GROUP*.

A business registration was located for the legal entity identified as *WEAVER CONSULTANTS GROUP OF MICHIGAN, LLC*.

Please clarify if your company's complete legal name is *WEAVER CONSULTANTS GROUP OF MICHIGAN, LLC*. Otherwise, please provide the complete legal name under which your company is actively registered.

2. Section 8.3, "Address(es) where Licensed Material will be Used or Possessed," of the guidance and Item 3 of the NRC Form 313, "Application for Materials License," require that you specify the address(es) where licensed materials will be used or possessed.

Item 3 of your license application identifies only three permanent storage locations. Condition 10 of your license authorizes five permanent storage locations, but your license application omitted your licensed locations in Evansville and Griffith, Indiana.

Clarify the status of your licensed sites in Evansville and Griffith, Indiana. If you require continuing authorization to use and possess licensed material at these locations, please submit a facility diagram and description of the locations with your response. Otherwise, please provide documentation supporting the release of these locations to unrestricted use.

If applicable, please provide the following information in support of your request to release the license locations to unrestricted use:

- Submit records of transfer and/or disposal for all sealed sources or portable gauging devices previously used and/or stored at the former location. 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.
  - Submit current Leak Test Reports for all sealed sources or portable gauging devices previously stored at the former location.
  - 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 location, including records of transfer/disposal of licensed materials and associated leak test reports.
3. Section 8.5.1, "Sealed Sources and Devices," specifies that you should provide the manufacturer's or distributor's name, model number for each device, and the number of gauges for each model.

Your license application does not account for the total number of portable gauging devices that you are currently licensed to possess.

If applicable, submit records of the transfer/disposal of portable gauging devices formerly in your possession.

4. Section 8.7.1, "Radiation Safety Officer," of the guidance identifies that the Radiation Safety Officer (RSO), is responsible for the oversight of licensed operations. The RSO must have sufficient organizational authority and management prerogative to enforce appropriate radiation protection rules, standards, and practices.

To formally establish the organizational authority of your office, please submit a current Delegation of Authority signed by a management representative. A model Delegation of Authority is provided in Appendix D, "Typical Duties and Responsibilities of the Radiation Safety Officer," of the guidance.

5. Section 8.13, "Item 13: Certification," specifies that a representative of the legal entity filing the application must sign and date the [NRC Form 313, "Application for Materials License."](#) The representative signing the application must be authorized to make binding commitments and to sign official documents on behalf of the applicant (i.e., a certifying official).

You signed the submitted application for license renewal. Though, your title is not recognized as that of a certifying official (i.e., President, Director or Manager).

Therefore, please revise and submit the application bearing the signature of a certifying official. For additional information, you may refer to Chapter 3, "Management Responsibility," of the guidance.

In accordance with 10 CFR §2.390 of the NRC's "Rules of Practice," a copy of this letter will be made available electronically for public inspection in the NRC Public Document Room or from the NRC's Agencywide Documents Access and Management System (ADAMS), accessible from the NRC Web site at <https://www.nrc.gov/reading-rm/adams.html>.

To continue review of your application, I request that you submit your response to this letter within 30 calendar days from the date of this letter. In your response, please refer to the license, docket, and control number specified below. I will assume that you do not wish to further pursue this licensing action if I do not receive a reply within the specified timeframe noted above.

If you have questions, require additional time to respond, or require clarification on any of the information stated above, I encourage you to contact me at [Jason.Kelly@nrc.gov](mailto:Jason.Kelly@nrc.gov) or at (630) 829-9737.

Sincerely,

Jason M. Kelly, MPH  
Health Physicist  
Materials Licensing Branch

Docket No.: 030-38128  
License No.: 21-32761-01  
Control No.: 629081