



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

May 13, 2022

Salah M. Al-Bakri, Vice President and  
Radiation Safety Officer  
Coastal Materials Testing Lab, LLC  
10 Hart Street  
West Haven, CT 06516

SUBJECT: COASTAL MATERIALS TESTING LAB, LLC, REQUEST FOR ADDITIONAL  
INFORMATION, MAIL CONTROL NO. 630758

Dear Mr. Al-Bakri:

This is in reference to your application dated April 8, 2022, requesting to renew NRC License No. 06-31464-01. Many of the items listed below reference NUREG-1556, Volume 1, Revision 2. You can find this document online at: <https://www.nrc.gov/reading-rm/doc-collections/nuregs/staff/sr1556/v1/index.html>. In order to continue our review, we need the following additional information:

1. Your application's NRC Form 313 did not include a request for temporary job sites in Box 3 "Address Where Licensed Materials Will Be Used Or Possessed." It is assumed that you wish to retain this authorization from your present license, and it will be carried over to your pending renewal. No response is required for this item unless the above is incorrect.
2. Your application described the isotopes, quantities, and forms of the sources to be used, but did not provide the manufacturers and models, nor the activity per device. In addition, it was noted that your application requested 165 millicuries of cesium-137 and 200 millicuries of americium-241, while your present license authorizes 55 millicuries and 220 millicuries, respectively. Consistent with NUREG-1556, Volume 1, Revision 2, Section 8.5 "Radioactive Material," please either:
  - a. Confirm you wish to retain your current license authorizations, including the maximum possession limit per isotope and device authorizations. As a reminder, this includes the Troxler Electronic Laboratories Model 3400 series and 4640/4640-B portable gauging devices, as well as the Humboldt Scientific, Inc. Model 5001 portable gauging device, with up to 55 millicuries of cesium-137 and 220 millicuries of americium-241 total across all devices. If you elect this option: please provide a breakdown of the number of Humboldt devices and the number of Troxler devices you wish to authorize, as they have different source model authorizations.

OR:

- b. Provide a complete description of the radioactive active material authorizations you wish to request, including: the manufacturer, model, associated isotopes and activities, and the number of devices of each series or model.
3. Your application committed to providing in-house training to prospective gauge users by the RSO prior the using licensed materials. Consistent with NUREG-1556, Volume 1, Revision 2, Section 8.8 "Training for Individuals Working In or Frequenting Restricted Areas," please either:
  - a. Commit that the in-house training will meet the minimum criteria provided in NUREG-1556, Volume 1, Revision 2, Appendix C "Criteria for Acceptable Training Courses for Portable Gauge Users."

OR:

- b. Provide a description of your in-house training commensurate with and equivalent to the above-quoted Appendix C criteria for the NRC's review.
4. The following commitments and associated documents were noted as absent from your application. Consistent with NUREG-1556, Volume 1, Revision 2, please provide the following:
  - a. Commensurate with Section 8.9 "Facilities and Equipment," please 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."
  - b. Commensurate with Section 8.10.2 "Radiation Monitoring Instruments," either elect:
    - i. To commit to the following: *"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, Volume 1, Revision 2, "Consolidated Guidance About Materials Licenses: Program-Specific Guidance About Portable Gauge Licenses," in the event of an incident"*

OR:

- ii. Provide a description of an alternative procedure for determining source integrity after an incident involving the gauge

- c. Commensurate with Section 8.10.3 "Material Receipt and Accountability," either elect:
- i. To commit to the following: *"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."*
- OR:
- ii. Provide a description and justification of an alternate frequency and/or procedure to account for all sealed sources and devices received and possessed under the license
- d. Commensurate with Section 8.10.4 "Occupational Dose," commit to one of the following:
- i. *"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
- ii. *"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."*
- e. Commensurate with Section 8.10.6 "Operating, Emergency, and Security Procedures," please commit that the model procedures in Appendix G quoted in your application will be available at each jobsite to all gauge users.
- f. Commensurate with Section 8.10.7 "Leak Tests," either elect:
- i. *"Leak tests will be performed at intervals approved by the NRC or an Agreement State and specified in the Sealed Source and Device 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."*
- OR
- ii. *"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."*
- OR

- iii. Provide a description of alternative equipment and/or procedures for determining whether there is any radioactive leakage from sources contained in gauges and the statement: *"Records of leak tests will be maintained."*
  
- g. Commensurate with Section 8.10.8 "Maintenance," either elect:
  - i. To commit to the following:  
*Routine cleaning and lubrication: "We will implement and maintain procedures for routine maintenance of our gauges according to each manufacturer's written recommendations and instructions"*  
  
AND  
  
*Nonroutine maintenance or repair operations that require detaching the source or source rod from the gauge: "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."*  
  
OR
    - ii. As applicable: (1) For routine cleaning and lubrication: Provide alternative procedures; and/or (2) For nonroutine maintenance or repair operations that require detaching the source or source rod from the gauge: Request to perform this work "in-house," and provide information commensurate with Appendix F of NUREG-1556, Volume 1, Revision 2 to support the request.

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

Jason vonEhr  
Mail Control No. 630758  
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. 630758

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 me at (610) 337-5256 or via electronic mail at [Jason.vonEhr@nrc.gov](mailto:Jason.vonEhr@nrc.gov).

Thank you for your cooperation.

Sincerely,

Jason vonEhr, Health Physicist  
Commercial, Industrial, R&D  
and Academic Branch  
Division of Radiological Safety and Security  
Region I

License No.: 06-31464-01  
Docket No.: 030-38520  
Mail Control No.: 630758

COASTAL MATERIALS TESTING LAB, LLC, REQUEST FOR ADDITIONAL INFORMATION,  
MAIL CONTROL NO. 630758 DATED MAY 13, 2022

DOCUMENT NAME: G:\WBL Documents\WBL License RAI\L06-31464-01.630758.RAI.docx

**SUNSI Review Complete: JEV**

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OFFICE	RI:DRSS	N					
NAME	Jason vonEhr						
DATE	05/13/2022						

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