

From: [Tran, Frank](#)
To: [Weidner, Peter](#)
Subject: Request additional information for NRC License No. 24-26136-01
Date: Friday, March 11, 2022 2:23:00 PM

Dear Mr. Weidner:

We reviewed your letter dated February 18, 2022 providing information to renew NRC License No. 24-26136-01. We reviewed the letter according to the licensing guidance in NUREG-1556, Volume 2, Revision 1 and Volume 20, Revision 1. Based the review, we will need the following.

1. Your license is currently authorized for QSA Global, Inc. Model 680B and QSA Global, Inc. Model 771; however, you would like to remove them from your license. You provided that you have possessed and used QSA Global, Inc. Model 680-OP, instead of Model 680B. Please confirm that you no longer possess QSA Global, Inc. Model 680B and QSA Global, Inc. Model 771 and provide a copy of the transferring receipt and the last leak test for the QSA Global, Inc. Model 680B.
2. Provide a confirmation that MetalTek International will not permit any individual to act as a radiographer's assistant until the individual has received copies of and instruction in the requirements described in NRC regulations contained in 10 CFR 30.7, 30.9, and 30.10, in the applicable sections of 10 CFR parts 19 and 20, in applicable DOT regulations as referenced in 10 CFR part 71, in the NRC license under which the radiographer's assistant will perform industrial radiography, and the licensee's operating and emergency procedures.
3. Provide a confirmation that MetalTek International will not permit any individual to act as a radiographer until the individual has received copies of and instruction in the requirements described in NRC regulations contained in 10 CFR 30.7, 30.9, and 30.10.
4. Describe the practical field examination that will be given to prospective radiographer's assistants.
5. Describe the process for verifying and documenting the certification status of radiographers and for verifying that their certification remains valid.
6. Describe how the annual refresher training for radiographers and radiographer's assistants will be conducted (e.g., classroom, computer-based).
7. Based on 10 CFR 34.43(e), please confirm that MetalTek International will conduct observation of the performance of each radiographer's assistant during an actual industrial radiographic operation, at intervals not to exceed 6 months.
8. The description for inspecting the job performance of each radiographer and radiographer's assistant was not provided; however, MetalTek International states

that the performance audit will be documented on Radiation Record Form RR-8. Please provide a description for inspecting the job performance or a copy of the Radiation Record Form RR-8.

9. It is not clear about the qualification of individuals (instructors) who will provide training in radiation safety for prospective radiographers and radiographer assistants or annual refresher training. Based on the licensing guidance, instructors who provide classroom training to individuals in the principles of radiation and radiation safety should have knowledge and understanding of these principles beyond those obtainable in a course similar to the one given to prospective radiographers. Please provide a brief description of the qualification for the instructors (e.g., RSO, Health Physics consultant).
10. It is not clear about the qualification of individuals (instructors) who will provide training in hands-on use of radiography equipment for prospective radiographers and radiographer assistants. Based on the licensing guidance, the instructors should be qualified radiographers with at least 1 year of experience in performing radiography or should possess a thorough understanding of the operation of radiographic equipment (e.g., a manufacturer's service representative). Please provide a brief description of the qualification for the instructors (e.g., a qualified radiographer with at least 1 year of experience in performing industrial radiography.)
11. In License Condition 10 of the current license, the NRC authorizes MetalTek International to conduct industrial radiography operations outside the permanent radiographic installations at its facility located at 8600 Commercial Blvd., Pevely, Missouri. If there is no change to the area listed in this license condition, please confirm.
12. The radiation shielding calculations were not based on the maximum radioactive material (Co-60 or Ir-192) in the sealed sources per your request. Please update the calculations or provide the actual dose rate in the unrestricted areas in the worst case scenario. If the dose in the unrestricted areas will exceed the NRC requirement, please provide steps the licensee will take to control and limit the radiation dose to below the NRC requirement.
13. Provide the statement that physical inventories will be conducted and documented at least quarterly (not to exceed 3 months) to account for all sealed sources containing byproduct material and devices containing depleted uranium received and possessed under the license.
14. Provide the statement that calibration for radiation survey meters will be performed by an NRC or Agreement State licensee specifically authorized to perform instrument calibration.
15. Provide the statement that MetalTek International will comply with NSTS reporting requirements as described in 10 CFR 20.2207.

16. Provide the statement that leak tests sample collection and analysis will be performed by an organization authorized 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 sample analysis services to other licensees and according to the instructions provided in the leak-test sample collection kit.
17. Provide a confirmation that MetalTek International will perform routine maintenance activities for radiography devices and equipment in accordance with the manufacturer/vendor instructions.
18. The quarterly maintenance activities were not provided in details. Instead, MetalTek International states that it will use the steps in Form RR-6 for quarterly maintenance of radiography devices and equipment. Please provide the quarterly maintenance procedures or a copy of Form RR-6.
19. In the instruction for operating QSA Global, Inc. Model 680-OP, Step 21 referenced the dismantling instructions for QSA Global, Inc. Model 680B. In Section 8.10.3.2, "Method for Co-60 Source Replacement", Steps B.10, B.35, and B.36 referenced QSA Global, Inc. Model 680B. It is not clear if these steps referred to QSA Global, Inc. Model 680B or in fact Model 680-OP. Please review and update those areas if needed or provide a clarification.
20. For your information only, the unit for removable contamination indicated in Section 8.10.4, "Leak Test", should be micro-curie.

To continue the review of your application, we request that you submit your response under a dated and signed cover letter by April 1, 2022. In the cover letter, please refer the license number, docket number and Mail Control No. 629933.

If you have questions, require additional time to respond, or require clarification on any of the information stated above, please contact me at 630-829-9623 or reply to this email.

In accordance with Title 10 of the *Code of Federal Regulations* (10 CFR) 2.390 of the NRC's "Rules of Practice," a copy of this correspondence 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>.

Best regards,

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