



**UNITED STATES
NUCLEAR REGULATORY COMMISSION**
REGION I
475 ALLENDALE ROAD – SUITE 102
KING OF PRUSSIA, PA 19406-1415

November 9, 2022

Peter J. Branch, President &
Radiation Safety Officer
Branch Radiographic Laboratories, Inc.
32 South Avenue West
Cranford, New Jersey 07016

**SUBJECT: BRANCH RADIOGRAPHIC LABORATORIES, INC., REQUEST FOR
ADDITIONAL INFORMATION, MAIL CONTROL NO. 632153**

Dear Mr. Branch:

This is in reference to your application dated July 25, 2022, requesting to renew NRC License No. 29-03405-02. In order to continue our review, we need the following additional information:

- 1) NUREG 1556, Vol. 2, Rev. 1, "Consolidated Guidance About Materials Licenses: Program-Specific Guidance About Industrial Radiography Licenses," requests licensees to state the following.

"Pursuant to 10 CFR 30.35(g), we shall maintain records important to decommission and transfer these records to an NRC or Agreement State licensee before licensed activities are transferred or assigned, in accordance with 10 CFR 30.34(b). Furthermore, pursuant to 10 CFR 30.51(f), prior to license termination, we shall forward the records required by 10 CFR 30.35(g) to the appropriate NRC regional office."

Your license renewal application did not specifically include this statement. Please provide this commitment.

- 2) NUREG 1556, Vol. 2, Rev. 1, "Consolidated Guidance About Materials Licenses: Program-Specific Guidance About Industrial Radiography Licenses," requests licensees to submit

"procedures for verifying and documenting the certification status of radiographers and for verifying that their certification remains valid. As a minimum, your procedures for newly hired, previously certified individuals should require documentation that you contacted the certifying entity and confirmed the certification. Your procedures should also ensure that you are aware of certification expiration dates and that individuals with expired certifications do not act as radiographers. Consider adding to the form for inspecting job performance."

The license renewal application did not specifically include this statement. Please provide these procedures.

- 3) NUREG 1556, Vol. 2, Rev. 1, "Consolidated Guidance About Materials Licenses: Program-Specific Guidance About Industrial Radiography Licenses," requests licensees to provide the following statements:

- “Physical inventories will be conducted and documented at quarterly intervals (not to exceed 3 months) to account for all sealed sources containing byproduct material and devices containing depleted uranium received and processed under the licenses.”

AND

- “We will develop, implement, and maintain procedures for ensuring accountability of licensed materials at all times.”

AND

We will comply with the NSTS reporting requirement, as described in 10 CFR 20.2207.”

Your license renewal application did not specifically include these statements. Please provide these commitments.

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

Randolph C. Ragland, Jr.
Mail Control No. 632153
USNRC, Region I
Division of Radiological Safety and Security
475 Allendale Road – Suite 102
King of Prussia, PA 19406

Or

R1DRSSMail.Resource@nrc.gov
Reference – Randolph C. Ragland, Jr.
Mail Control No. 632153

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. 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 "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 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 610-337-5083 or via electronic mail at Randolph.Ragland@nrc.gov.

Thank you for your cooperation.

Sincerely,

Randolph C. Ragland, Jr., Senior Health
Physicist
Commercial, Industrial, R&D
and Academic Branch
Division of Radiological Safety and Security
Region I

License No. 29-03405-02
Docket No. 03005291
Mail Control No. 632153

BRANCH RADIOGRAPHIC LABORATORIES, INC., REQUEST FOR ADDITIONAL INFORMATION, MAIL CONTROL NO. 632153 DATED NOVEMBER 9, 2022

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SUNSI Review Complete: R. Ragland

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