



## ECS MID-ATLANTIC, LLC

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November 8, 2022

Jason VonEhr, Health Physicist  
USNRC, Region I  
Division of Radiological Safety and Security  
Commercial, Industrial, R&D and Academic Branch  
475 Allendale Road – Suite 102  
King of Prussia, PA 19406

Subject: ECS Mid-Atlantic, LLC, Request for Additional Information, Mail Control No. 632691

Dear Mr. VonEhr:

We are submitting this letter to provide additional information, as requested in your letter dated October 26, 2022.

1. In preparing to amend your license, it was determined that your present authorization for the Troxler Electronic Laboratories ("Troxler") Model 3400 Series and Model 3216 should not have been co-authorized under License Condition 6/7/8/9.D, as these devices have contrasting sealed source authorizations (i.e. the Model 3216's Am-241/Be source authorization does not include the Isotope Products Laboratories Model No. 3021 or 3027, which is present on the corresponding authorization for the Model 3400 series). During a phone call on October 26, 2022, Mr. Matheny stated that your ECS Mid-Atlantic office does not presently possess the Model 3216 nor does it intend to acquire this model of portable gauge in the near-future, and that this device authorization could be removed from the NRC license.

Please confirm you wish to remove this authorization, and that any gauges of this type that had been possessed, if ever, have been transferred to the authority of another NRC or Agreement State license (e.g. returned to a manufacturer or transferred to another specific licensee, such as the ECS Mid-Atlantic Commonwealth of Virginia license).

**Response: License Conditions 6/7/8/9.D, we confirm the removal of Troxler Electronic Laboratories Model 3216 from our license.**

**The Troxler 3216 equipment was transferred to our Roanoke, VA office as authorized under their Commonwealth of Virginia Radioactive Materials License.**

2. In addition to the above, on the call with Mr. Matheny on October 26, 2022, Mr. Matheny further stated that the present authorization for CPN International Model MC Series PORTAPROBE portable gauges could likewise be removed from the NRC license. Consistent with Item No. 1 of this letter: Please confirm you wish to remove this authorization, and that any gauges of this type that had been possessed, if ever, have been transferred to the authority of another NRC or Agreement State license.



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**Response: ECS, currently does not possess any CPN International Model MC Series PORTAPROBE portable gauges. Since many other ECS offices in the Virginia currently use CPN International Model MC Series PORTAPROBE gauges, we wish to retain the ability to possess and use this equipment in the future. We ask to retain 22mci of Cs:137 and 110mci of Am:241Be.**

**The CPN International Model MC Series PORTAPROBE portable gauges were transferred to our Chantilly, VA office as authorized under their Commonwealth of Virginia Radiation Materials License., our San Antonio, TX office as authorized under their Texas Department of State Health Services Radioactive Materials License and transferred to an authorized manufacturer's service center North East Technical Services as authorized under their Maryland Department of the Environment Radioactive Materials License.**

3. Please note that the authorizations on your license for the Troxler Model 3400 Series and Model 3411-B will be merged in your amended license, since the Model 3411-B is incorporated by reference in the Sealed Source and Device Registry within the Model 3400 Series. As a result, the NRC no longer needs to list the Model 3411-B explicitly on portable gauge licenses separately from the Model 3400 series. No response is required for this item.
4. The Troxler Model 3400 series and the requested Model 4640/4640-B share the same Cs-137 source authorizations and as a result these authorizations can be listed under the same license condition. Your present authorization under License Condition 6/7/8/9.A authorizes up to 63 mCi of Cs-137 for the Troxler Model 3400 Series and Model 3411-B (\*see note above regarding the merger of these two model authorizations). Your letter dated September 27, 2022, requested authorization for a single Model 4640/4640-B device (up to 9 mCi of Cs-137). Please confirm that an authorization in License Condition 6/7/8/9.A for up to 72 mCi of Cs-137 for the Troxler Model 3400 Series and Model 4640/4640-B will be sufficient for your NRC licensed activities.

**Response: License Condition 6/7/8/9.A can remain at 63 mCi for Cs-137 will be sufficient to cover the Troxler Model 3400 Series and Model 4640/4640 portable gauges for this license. ECS recently transferred our existing Troxler Model 3411B series gauges for disposal to InstroTek, Inc., an authorized portable density gauge manufacturer licensed with the state of North Carolina Department of Health and Human Services.**

If you have any further questions or concerns, please feel free to contact me at 757-449-2017 or email me at [dmatheny@ecslimited.com](mailto:dmatheny@ecslimited.com).



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Respectfully submitted,

A handwritten signature in blue ink that reads 'Dave M. Matheny'. The signature is fluid and cursive, with a large initial 'D'.

Dave Matheny

Field Services Manager/Radiation Safety Officer

Cc: David Anderson, PE, Branch Manager

Jeffrey Castonguay, Subsidiary Radiation Compliance Officer

Ron Newman, Corporate Radiation Compliance Officer