

From: [Betsy Ullrich](#)
To: [Betsy Ullrich](#)
Subject: RE: Re: your request to extend your license by 5 years
Date: Wednesday, November 16, 2022 8:55:00 AM

Gary – do you have a change of control request coming in? it's been almost 4 weeks. I've had a few discussions with other staff and here is what we can and cannot do at this time.

Your action is 57 days old today, and I have to get it completed within 90 days. Options are:

- I can issue the 5-year extension and relief from decommissioning if I get a change of control request in. Otherwise, I can't think do either.
 - Your current license expires November 2024
 - You have not done work since at October 2020, so not having worked for 24 months [as we discussed before] means you are required to notify us by December 2022 [that is within 60 days of the 24 months without doing work] that you will be decommissioning; or by November 2022 [within 30 days...] request a delay for beginning decommissioning
 - A likely/probable sale is not enough to delay the decommissioning requirement, unless I have an actual request to change control of the license
 - You would be required to complete decommissioning no later than October 2024. That means transfer of any sources (I believe you do not currently possess any sources) and cameras containing DU [not sure if you do or do not have cameras on hand]. October 2024 is prior to the current expiration date of your license, so it is not reasonable to extend that date at this time.
- If you change your request to that of a "Standby" license, I can issue that for a 2-year period. A "stand-by" license means
 - you cannot do any work under the license but that you expect to need it in the future due to an expectation that business demands are likely to change; you can amend the license any time to return to work status and the original license expiration date; we could add the 5 years at that time
 - the stand-by is issued only for a 2-year period but may be renewed
 - you have to submit an inventory of licensed material on hand and describe how you will secure it during the interim. Based on the past 2 inspections, you do not currently possess any sources, but I am unsure if you have any cameras etc with DU licensed material.

Please think about this and let me know what you want to do.
Thanks,
Betsy

From: Betsy Ullrich
Sent: Thursday, October 20, 2022 10:36 AM
To: Gary Gwisdalla <ramblinacres@frontier.com>

Subject: RE: Re: your request to extend your license by 5 years

Gary,

Yes, I am the one with the horses.

We can talk about how to accomplish the amendment etc and if you can get the change of ownership to me in the next couple of weeks, the extension will likely be unnecessary. You have requested it, and we have not given an answer yet. That tends to be a long process, so.... I suspect we could get the change of ownership done before we would get the actual answer. In the meantime, you are fine.

Betsy

From: Gary Gwisdalla <ramblinacres@frontier.com>

Sent: Wednesday, October 19, 2022 4:27 PM

To: Betsy Ullrich <Elizabeth.Ullrich@nrc.gov>

Subject: [External_Sender] Re: your request to extend your license by 5 years

Betsy,

I have spoke to Danny Schroder with Titan Inspection in PA. We will be going forward with a request to the Commission for a transfer of ownership within the next couple weeks, so yes we are still wanting the five year license extension to our current license. Is this a justifiably reason to request an extension to 10 CFR 30.36(f) the 24 month without principal activities? Can I call or email you if I have other specific questions? I thought being retired was going to be a lot easier! LOL Thanks! Are you the Gal that has Horses?

"G" @ GT&I

Sent from my iPad

On Oct 19, 2022, at 2:59 PM, Gary Gwisdalla <ramblinacres@frontier.com> wrote:

Betsy,

The reason for the five year extension is that a friend of mine in PA also owns a Radiography Inspection company and has a current Materials License with the State of PA. He is interested in doing work in West Virginia but first he/we need to do a transfer of ownership correct me if I'm wrong. He has contacted Region 1 about what is required going forward. I'm not sure where things are at currently but will contact him and find out. Thanks for your help.

"G" @ General Testing.

Sent from my iPad

On Oct 19, 2022, at 1:40 PM, Betsy Ullrich <Elizabeth.Ullrich@nrc.gov> wrote:

Mr. Gwisdalla,

I am reviewing your request to extend your license by 5 years. however, I reviewed the notes from the 2021 and 2022 inspections, and both indicate that you have not possessed material since October 2020, and both reminded you that there is a regulatory requirement to notify the NRC if you have not worked with licensed material for 24 months. It may be that you have worked with material since the most recent inspection September, but I do not see any changes of your licensed material inventory in NSTS.

This requirement is in 10 CFR 30.36(d), and there are additional actions that you must take. There may be some options within those actions.

<image003.jpg>

As you can see, you must

1. notify us within 60 days (so by the end of December 2022) that you have not performed licensed activities for a period of 24 months
2. then you must either
 1. begin decommissioning, which in your case means transferring all your licensed material, which you did in 2020, or
 2. if you facility is contaminated, submit a decommissioning plan within 12 months
3. note that 30.36(f) allows you to request an extension to the 24 months, but you must submit that request within 30 days of the 24 months (so by the end of November)

<image004.jpg>

Your current license does not expire until 2024. However, by the end of October 2022, it will be 24 months without doing any licensed activities. Unless you request an extension of the 30.36(d)(3) requirement to notify us and begin decommissioning of (and ultimately terminate) your license, there will be no need to extend or renew the license.

Please let me know if you still wish the 5-year extension.

If you wish to make a request to extend the 24 months without principal activities, you must make that request by the end of November, and that request has to include as justification as to

why such an extension is needed.

Please contact me if you have any questions. I can be reached by email, or by cell phone 240-704-4575.

Thanks,
Betsy

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