

From: [Frank Tran](#)
To: richard.savola@gentex.com
Subject: Request additional information for NRC Materials License No. 21-32837-01
Date: Monday, October 3, 2022 6:03:00 PM

Dear Mr. Savola:

This refers to the license renewal application for Gentex Corporation, NRC Materials License No. 21-32837-01. We reviewed the application in accordance with the NRC regulations and licensing guidance; specifically, NUREG-1556, Volume 7, Revision 1; and Volume 20, Revision 1. Based on the review, we will need the following information.

1. Provide the following statement: ““Pursuant to 10 CFR 30.35(g), we will maintain records important to decommissioning 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 will forward the records required by 10 CFR 30.35(g) to the appropriate NRC Regional Office.”
2. Please verify if the licensee would like only one user, Michael Malski, in the license.
3. Please confirm that the licensee will follow the manufacturer instructions for operating and maintaining the device containing licensed material.
4. Describe the training and experience in radiation safety for individuals who will perform the cleaning of the source holder containing the foil source (e.g., authorized user listed in the license who has been trained in the cleaning procedure in accordance with the manufacturer manual and has been trained in the use of appropriate radiation survey instrument for the type of licensed material.)
5. Please confirm and state that maintenance, repair, replacement, and disposal of foils contained in detector cells (source holders) shall be performed only by the device manufacturer or other persons specifically authorized by the NRC or an Agreement State to perform such services.
6. Please confirm that a radiation contamination survey will be conducted before and after the radioactive source is serviced; and if contamination is detected, the source shall be removed immediately from service and decontaminated, repaired, or disposed of in accordance with NRC regulations.
7. The current licensing guidance for your license is NUREG-1556, Volume 7, Revision 1 dated February 2018; however, for the radiation monitoring instruments you committed to follow Appendix M in NUREG-1556, Vol. 7 dated December 1999. Please resubmit the following: “We will use instruments that meet the radiation monitoring instrument specifications published in Appendix I in NUREG–1556, Volume 7, Revision 1, ‘Program-Specific Guidance About Academic, Research and Development, and Other Licenses of Limited Scope.’ We reserve the right to upgrade

our survey instruments as necessary”.

8. To ensure survey instrument can perform its intended function in monitoring radiation levels, provide one of the following:

State that survey instruments will be calibrated before first use, at least annually thereafter, and after any repair, by a vendor that the NRC or an Agreement State has licensed to perform instrument calibration.

Or

State that: “We will implement the model radiation survey meter calibration program published in Appendix I in NUREG–1556, Volume 7, Revision 1 ‘Program-Specific Guidance About Academic, Research and Development, and Other Licenses of Limited Scope.’”

Or

Submit equivalent procedures for instrument calibrations.

9. The licensee stated that it has developed procedures for safe use of licensed material, security and emergencies. However, the licensee did not commit to implement and maintain those procedures. Please provide the following: “We will develop, implement, and maintain procedures for safe use of licensed material, security and emergencies.”
10. Based on the manufacturer’s manual which the licensee provided, licensed material will not be disposed by the licensee. Please confirm that the licensee will dispose its radioactive sources by transferring to other authorized person who is licensed by the NRC or an Agreement State.
11. Provide a copy of the delegation of authority for the Radiation Safety Officer.
12. The licensee stated that it will not post radiation sign for the room because the radiation level did not meet the criteria for a radiation area. Please note that the licensed material in the room may exceed the threshold to post a radioactive material sign. Please verify and confirm that the licensee will follow the requirement specified in 10 CFR 20.1902(e).

To continue the review of your application, we request that you submit your response under a dated and signed cover letter by October 31, 2022. In the cover letter, please reference Mail Control No. 631648. We will assume that you do not wish to further pursue this licensing action if we do not receive a reply within the specified timeframe noted above.

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,

Frank Tran

Health Physicist/License Reviewer

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Fax: 630-515-1078

Email: Frank.Tran@nrc.gov



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References:

NRC Regulations: <https://www.nrc.gov/reading-rm/doc-collections/cfr/index.html>

NUREG-1556 Series: <https://www.nrc.gov/reading-rm/doc-collections/nuregs/staff/sr1556/index.html>

NUREG-1757: <https://www.nrc.gov/reading-rm/doc-collections/nuregs/staff/sr1757/index.html>