

From: [Frank Tran](#)
To: brianh@tymeengineering.com; ogeu@tymeengineering.com
Subject: Request additional information for NRC Materials License No. 21-32523-01
Date: Monday, November 28, 2022 3:15:00 PM

Dear Mr. Udegbunam:

We have reviewed your amendment request dated October 27, 2022, for NRC License No. 21-32523-01 in accordance with the NRC regulations and NUREG-1556, Volume 1, Revision 2. Based on the review, we will need additional information for Item 1 below. Item 2 is for your information only.

1. You request an additional location of use and a change to the licensed material. Specifically, you request to add the facility located at 3186 Pinetree Road, Lansing, Michigan 48911 as a new location of use and to increase the possession of portable gauges from 20 to 30. Please provide the maximum number of gauges will be stored at the new location, the estimated maximum radiation dose rate (millirem per hour) and the maximum annual dose (millirem per year) in the unrestricted areas surrounding the storage area. You could refer to Appendix H, "Dosimetry-Related Guidance" in the licensing guidance NUREG-1556, Volume 1, Revision 2, for estimating the radiation dose-rate/dose. A pdf copy of the guidance can be obtained from the NRC website at <https://www.nrc.gov/reading-rm/doc-collections/nuregs/staff/sr1556/v1/index.html>.
2. You provided that Jamie Dick will be the Associate Radiation Safety Officer. For your information, the NRC does not have a definition for the Associate Radiation Safety Officer except for radioactive materials licenses for medical use permitted by 10 CFR part 35 (10 CFR 35.2). In addition, the NRC licensing guidance recommends to name only one RSO in the license. The RSO is the person responsible for the licensee's radiation protection program and that responsibility may not be transferred to other individuals. Many tasks and duties associated with managing the program may be assigned or delegated to other qualified individuals; however, the responsibility for these tasks and duties remains with the RSO. The NRC recognizes that a qualified individual will on occasion fill in for the RSO when the RSO is away for short periods of time (e.g., professional conferences, vacation, illness). Absences that have a major impact on licensed activities should not occur for extended or indefinite periods of time. Consideration should be given to how individuals temporarily delegated the duties and tasks of the absent RSO could contact the RSO in the event of an emergency. With that, you can establish the Assistant RSO(s) (who is qualified for the tasks and is delegated in writing) within your company to support the RSO. We will not list Jamie Dick in the license.

To continue the review of your application, we request that you submit your response under a dated and signed cover letter by December 28, 2022. In the cover letter, please refer the license number, docket number and Mail Control No. 633344. 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>.

Sincerely,

Frank Tran

Health Physicist/License Reviewer

Phone: 630-829-9623

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