

From: [Frank Tran](#)
To: mark@towerscan.com
Subject: Request additional information for NRC Materials License No. 21-32347-01
Date: Friday, October 7, 2022 4:42:00 PM

Dear Mr. Gledhill:

This refers to the license renewal application for American Tower Scanning, Inc., NRC Materials License No. 21-32347-01. We reviewed the application in accordance with the NRC regulations and licensing guidance; specifically, NUREG-1556, Volume 3, Revision 2; Volume 18, 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. Provide: a) name and location of the manufacturer/vendor who made your custom source holders and the collimators, and b) name and location and radioactive material license number of the manufacturer/vendor who installed the sealed sources into your custom source holders.
3. Describe the conditions of use (environment) where licensed material will be used (maximum and minimum ambient temperature, corrosive, humidity, vibration, and/or shock environment).
4. Describe labeling for the radioactive source on the source holder (see Section 10.4, "Labeling", in NUREG-1556, Vol. 3, Rev. 2 for references).
5. Provide a confirmation that the custom source holder will be freely inserted into the custom collimators or custom shipping devices without any excessive force or modification to the custom source holder.
6. Provide a confirmation that the licensee will use the source holder according to the manufacturer/vendor instructions and applicable Sealed Source and Device Registry certifications.
7. Confirm that the Radiation Safety Officer will be available for emergencies and can be on-site within 24-48 hours, if applicable.
8. Provide the following: "Records of inventory will be maintained for a period of 5 years from the date of each inventory, and will include the radionuclides, quantities, manufacturer's name and model numbers, and the date of the inventory."

9. Confirm that the licensee will have a working calibrated survey meter at the site where source holder will be transferred from the storage container to the collimator and vice versa; and the survey meter will be used to verify the location of the source where it is intended after the transferring. Provide the following: “We will use instruments that meet the radiation monitoring instrument specifications published in Appendix F of NUREG–1556, Volume 18, Revision 1, ‘Consolidated Guidance About Materials Licenses: Program-Specific Guidance About Service Provider Licenses.’ We reserve the right to upgrade our survey instruments as necessary.”
10. Provide the following: “We will implement and maintain procedures for conducting routine maintenance of devices according to each manufacturer’s (or distributor’s) writing recommendations and instructions. We will have the device manufacturer (or distributor) or other person authorized by NRC or an Agreement State to perform nonroutine maintenance of devices.”
11. In accordance with 10 CFR 30.41 and 20.2006, provide the following: “We will dispose our licensed material by transferring to other authorized specific license(s)”.

To continue the review of your application, we request that you submit your response under a dated and signed cover letter by November 7, 2022. In the cover letter, please reference Mail Control No. 632305. 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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Email: Frank.Tran@nrc.gov



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](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>