

From: [Jason Kelly](#)
To: mikefoley@ppimo.com
Cc: eparrish@ppimo.com
Subject: U.S. NRC Materials License No. 24-25998-01
Date: Tuesday, April 18, 2023 6:12:00 PM

Mr. Foley:

I have reviewed the request dated February 18, 2023, signed by Erin Parrish, Ph.D., President, for an amendment to U.S. Nuclear Regulatory Commission (NRC) Materials License No. 24-25998-01. Upon review, I identified the following areas in which additional or clarifying information is needed:

1. Section 8.7.1, "Radiation Safety Officer," of NUREG-1556, Volume 1, Rev. 2 (Consolidated Guidance About Materials Licenses: Program-Specific Guidance About Portable Gauge Licenses," identifies that the Radiation Safety Officer (RSO) must have adequate training and experience. This may include evidence of completion of a portable gauge manufacturer/distributor's course for Authorized Users or Radiation Safety Officers, with hands-on experience with portable gauges. An equivalent course meeting the criteria specified in Appendix C, "Criteria for Acceptable Training Courses for Portable Gauge Users," is also acceptable.

The request referred to the proposed RSO's radiation safety training and experience but did not identify the completion of hands-on experience with portable gauging devices.

Please provide supplemental documentation identifying that the proposed RSO has attained hands-on experience with portable gauging devices.

2. An update to your license is needed to align with the current format specified in our Web-based Licensing System and our current licensing policy that does not permit open-ended license authorizations as currently identified in Items 6, 7, 8 and 9 of your license. Please identify the number of and total activity required for each of the following portable gauging devices identified on your license:

- Troxler Electronic Laboratories Model 3400 Series portable gauging devices
- Troxler Electronic Laboratories Model 3241 Series asphalt content gauging devices
- Troxler Electronic Laboratories Model 4640 thin layer density gauging device
- Humboldt Scientific, Inc., Model 5001 portable gauging devices

Further, please clarify which Troxler Electronic Laboratories Model 3241 Series asphalt content gauging devices are in your possession. This likely includes either of the following Troxler Electronic Laboratories Models 3241-C, 3241-D or 3241-G. Though, there are some older models in the series that may also be applicable, including the Troxler Electronic Laboratories Model 3241, 3241-B and 3241-M.

Please respond to this request for additional information within 15 calendar days so that I may timely complete the request. In your signed response letter, please refer to your U.S. NRC Materials

License No. 24-25998-01, Docket No. 030-30927 and Control No. 634584.

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