



Request for Additional Information

DATE: December 5, 2023

TO: Jason M Kelly, MPH U.S. NRC Region III

FROM: Travis Behnke, Owner-Director of Operations- Summit NDE

RE: U.S. NRC Materials License No. 13-35681-01 – Request for Additional Information
Control Number: 637474

This is a formal response to your email request for the following items. Please find the below items attached to my email response to you.

1. We would like to request an amendment to our license requesting the use of depleted uranium in the amount of 15.6 kilograms (34.4 pounds) for *each* licensed radiographic exposure device.
2. We do not require authorization for other manufacturers' radiographic source assemblies compatible with the QSA Global, Inc., Model 880 Delta radiographic exposure devices at this time.

Sincerely,

Travis Behnke

Owner-Director of Operations
Summit NDE, LLC.
8762 Louisiana St. Suite R
Merrillville, IN 46410
O: (219) 213-3180
C: (219) 902-6110

Martha Pavon

From: Jason Kelly
Sent: Tuesday, December 5, 2023 5:05 PM
To: Martha Pavon
Subject: FW: RE: RE: Materials License #13-35681-01 - Request for Additional Information
Attachments: RAI_12-5-2023_SummitNDE.pdf

Martha,

Hello again. Attached is an incoming Response to a Request for Additional Information Letter dated December 5, 2023 for Materials License No. 13-35681-01 (Summit NDE, LLC), Docket No. 030-39315 for Control No. 637474.

Jason M Kelly, MPH
Health Physicist
U.S. NRC Region III – DRSS MLB
Phone: (630) 829-9737
E-mail: Jason.Kelly@nrc.gov

From: Travis Behnke <Travis.Behnke@summitnde.com>
Sent: Tuesday, December 5, 2023 4:57 PM
To: Jason Kelly <Jason.Kelly@nrc.gov>
Cc: Matt DiMonte <Matt.Dimonte@summitnde.com>
Subject: [External_Sender] RE: RE: Materials License #13-35681-01 - Request for Additional Information

Hello Mr. Kelly,

I apologize for the delay in my response, and I appreciate your patience. Please see the attached for our response to your request for additional information. Thank you!

From: Jason Kelly <Jason.Kelly@nrc.gov>
Sent: Monday, December 4, 2023 10:18 AM
To: Travis Behnke <Travis.Behnke@summitnde.com>
Cc: Matt DiMonte <Matt.Dimonte@summitnde.com>
Subject: FW: RE: Materials License #13-35681-01 - Request for Additional Information

Mr. Behnke:

I am following-up on the below request as I haven't received a response to these two questions in which I was seeking to confirm that you were requesting authorization for 15.6 kg (34.4 lbs.) of Depleted Uranium for each licensed radiographic exposure device and to clarify if you wanted authorization for other manufacturers' radiography source assemblies compatible with the QSA Global, Inc., Model 880 Delta radiographic exposure device.

Please respond as soon as possible, but within 10 calendar days of this request so that I may complete your amendment request promptly.

Jason M Kelly, MPH
Health Physicist
Materials Licensing Branch
U.S. Nuclear Regulatory Commission

Region III
2443 Warrenville Road, Suite 210
Lisle, IL 60532-4352
Office: (630) 829-9737
Fax: (630) 515-1078



<http://www.nrc.gov/>

From: Jason Kelly
Sent: Wednesday, November 15, 2023 12:05 PM
To: Travis Behnke <Travis.Behnke@summitnde.com>
Cc: Matt DiMonte <Matt.Dimonte@summitnde.com>; Frank Tran <Frank.Tran@nrc.gov>
Subject: RE: RE: Materials License #13-35681-01 - Request for Additional Information

Mr. Behnke:

I have reviewed your response letter dated November 15, 2023 and wanted to confirm that you require 15.6 kg (34.4 lbs.) of Depleted Uranium for *each* licensed radiographic exposure device.

Additionally, your response did not address whether you would like authorization for compatible radiography source assemblies produced by other manufacturers for use with the QSA Global, Inc., Model 880 Delta radiographic exposure device as I referred to in Item 4 of my request dated October 31, 2023. Lacking a response, I will presume that you only need authorization for the currently authorized radiography source assembly.

Finally, I will remove authorization for source retrieval at this time since your response indicates that this will be subcontracted out to a third-party. You may request to have this authorization in the future by providing your applicable procedures and the identification of an appropriate source changer that will be available for storing the recovered source. Thanks.

Jason M Kelly, MPH
Health Physicist
Materials Licensing Branch
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Region III
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Office: (630) 829-9737
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<http://www.nrc.gov/>

From: Travis Behnke <Travis.Behnke@summitnde.com>
Sent: Wednesday, November 15, 2023 11:27 AM
To: Jason Kelly <Jason.Kelly@nrc.gov>
Cc: Matt DiMonte <Matt.Dimonte@summitnde.com>; Frank Tran <Frank.Tran@nrc.gov>
Subject: [External_Sender] RE: Materials License #13-35681-01 - Request for Additional Information

Hello Mr. Kelly,

I hope you are well. Please see the attached for our response to your request for additional information. Thank you!

From: Jason Kelly Jason.Kelly@nrc.gov

Sent: Tuesday, October 31, 2023 11:45 AM

To: Travis Behnke Travis.Behnke@summitnde.com

Cc: Matt DiMonte Matt.Dimonte@summitnde.com; Frank Tran Frank.Tran@nrc.gov

Subject: Materials License #13-35681-01 - Request for Additional Information

Mr. Behnke:

During the course of the review of your amendment request dated October 12, 2023, and your current license authorizations, my colleague, Frank Tran, Senior Health Physicist, and I, identified additional items requiring additional or clarifying information. This included the following items:

1. Item 6, 7, 8, and 9, Subpart A, of your license identifies that your company is authorized to possess and use the QSA Global, Inc., Model 880 *Series* Delta radiographic exposure device, which matches the request identified in your license application dated July 13, 2022, signed by Mitchyll Fuller, Chief Executive Officer. The QSA Global, Inc., Model 880 *Series* includes the following models: QSA Global, Inc., Model 880 Delta, 880 Sigma, 880 Elite, 880 Omega and 880 Atlas. The reference to the QSA Global, Inc., Model 880 *Series* is not necessary if your company only requires license authorization for the 880 *Delta* radiographic exposure device.

Please confirm that your company only requires continuing authorization for the QSA Global, Inc., Model 880 Delta radiographic exposure devices, or otherwise specify models within the QSA Global, Inc., Model 880 *Series* that you require license authorization to possess and use. For additional information and guidance, please refer to Section 8.5.1, "Sealed Sources and Devices," from NUREG-1556, Volume 2, Rev. 1, "Consolidated Guidance About Materials Licenses Program-Specific Guidance About Industrial Radiography Licenses," which may be accessed at: <https://www.nrc.gov/docs/ML1606/ML16062A091.pdf>

2. Item 6, 7, 8 and 9, of your license does not authorize your company to possess and use depleted uranium as shielding in your radiographic exposure devices. According to the Massachusetts Sealed Source & Device (SS&D) Registry Sheet No. MA-1059-D-334-S for the QSA Global, Inc., Model 880 Delta, each camera requires 15.6 kilograms (34.4 pounds) of depleted uranium as shielding. An amendment is needed to your license to identify the total number of kilograms of depleted uranium required for use as shielding in your radiographic exposure devices. For additional information, see Section 8.5.1, "Sealed Sources and Devices," from NUREG-1556, Volume 2, Rev. 1, "Consolidated Guidance About Materials Licenses Program-Specific Guidance About Industrial Radiography Licenses."

Please respond by requesting the addition of depleted uranium for use as shielding in radiographic exposure devices and identify the total number of kilograms required.

3. Item 6, 7, 8 and 9, of your license does not authorize your company to possess and use radiography source changers. The license application dated July 13, 2022, signed by Mitchyll Fuller, Chief Executive Officer, identified that you were seeking authorization to possess and use the QSA Global, Inc., Model 650L and 880SC radiography source changers. As your license authorizes the performance of source retrieval, the possession and use of a source changer may be necessary to facilitate recovery of a radiography source assembly.

Therefore, please clarify if you'd like to add authorization for possession and use of radiography source changers. If applicable, please identify the manufacturer and model numbers of the source changers that you would like to possess and use. Further, if you'd like authorization to perform source change in-house, include your source change procedures with your response. For additional guidance for developing source change procedures, please refer to Appendix K,

“Information for Applicants to Consider when Developing Procedures for Operating Radiography Equipment,” of NUREG-1556, Volume 2, Rev. 1.

4. Item 7, Subpart A, restricts your license authorization to possession and use of a single compatible radiography source assembly. Though, the license application dated July 13, 2022, signed by Mitchyll Fuller, Chief Executive Officer, identified that you were seeking authorization to also possess and use additional compatible radiography source assemblies.

It appears that these additional compatible radiography source assemblies were inadvertently withheld upon issuance of the new license. Please clarify if you’d like to add authorization for additional radiography source assemblies in addition to the radiography source assembly currently identified in your license. If applicable, please identify the manufacturer/distributor and model number for each additional radiography source assembly to be authorized.

5. Condition 10 of your license restricts your license authorization to use and store licensed material at temporary job sites. Storage, but not use, is permitted at your licensed facility in Merrillville, Indiana. Upon review of the submitted facility diagram included with the license application dated July 13, 2022, it was noted that your cameras are stored in a vault with additional shielding that may have been intended to serve as a permanent radiographic installation. Therefore, please clarify if you are seeking to perform industrial radiography within a permanent radiographic installation at your facility in Merrillville, Indiana.

If radiography will be performed in a permanent radiographic installation at your licensed facility, provide all the following information for each installation:

- An annotated sketch or drawing of the facility and its surroundings.
- The scale to which the sketch or drawing is made. The same scale should be used for all sketches and drawings. The recommended scale is 1/4 in = 1 ft. Drawings to this scale that do not fit on 8-1/2 × 11-inch paper may be provided as sectional drawings. Sketches or drawings should also include a compass directional arrow to indicate “North.”
- The type, thickness, and density of shielding materials on all sides, including the floor and the roof.
- The locations of entrance ways and other points of access to the facility.
- A description of the areas adjacent to the facility and the distance to these areas. Include information on areas adjacent to, above, and below the facility.
- A description of the general location of each proposed permanent radiographic installation (e.g., located in an industrial park, an office complex) and its current use.
- A description of the visible-audible signal system or entrance control system and its location.
- The results of radiation-level calculations or actual radiation measurements adjacent to, above, and below the installation. Provide the radiation level in all directions around the installation, including the roof. The radiation level should not exceed 0.02 mSv [2 mrem] in any one hour. Clearly identify the type of sealed source (radionuclide), the amount of radioactive material in the sealed source (activity), and the position or location of the sealed source within the installation for the calculations or measurements.

Further, indicate whether or not radiography will be performed at your licensed facility outside of a permanent radiographic installation. If radiography will be performed at a site outside of a permanent radiographic installation, provide a diagram of the location where radiography may be performed and its surroundings, including a description of adjacent property. Note: Radiographic operations may be conducted outside a permanent radiographic installation, as if the work was performed “in the field” at a temporary jobsite, provided that you comply with all NRC regulatory requirements (e.g., two-person crew).

Please respond to this request in writing within 15 calendar days. In your signed response letter, please include a reference to your U.S. NRC Materials License Number 13-35681-01 along with Control Number 637474.

You may also contact me at (630) 829-9737 or Jason.Kelly@nrc.gov if you have any questions or if you need additional time to respond to this request.

Jason M Kelly, MPH
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