

From: [Frank Tran](#)
To: KillingsworthT@michigan.gov
Subject: Request additional information for NRC Materials License No. 21-03039-01
Date: Friday, March 8, 2024 8:39:00 AM

Dear Tom Killingsworth,

This refers to the renewal license application for Michigan Department of Transportation, NRC License No. 21-03039-01. We reviewed the application in accordance with the licensing guidance in NUREG-1556, Volume 1, Revision 2. A pdf copy of the licensing guidance can be downloaded from the NRC website link below. The NRC policy is to renew a radioactive materials license in its entirety. All relevant information as required by NRC Form 313 must be submitted. Based on the review, we will need the following.

1. The address for Davison Transportation Services Center is listed as 9495 E. Potter Road on the license but 9445 E. Potter Road on the application. Please confirm the correct address for Davison Transportation Services Center.
2. There was a typographical error in Section 10.3., "Radiation Safety Program – Material Receipt and Accountability". Please provide the following statement: "The licensee will develop, implement, and maintain procedures for ensuring accountability of licensed materials at all times."
3. There was a typographical error in Section 10.4., "Radiation Safety Program – Occupational Dose". Please provide the following statement: "The licensee will maintain, for inspection by the NRC, documentation demonstrating that unmonitored individuals are not likely to receive a radiation dose in excess of the limits in 10 CFR 20.1502(a)."
4. If you plan to collect leak test samples and send to other authorized licensees for analyzing, provide the following statement: "The licensee may collect leak test samples for sealed sources using a leak test sample collection kit supplied by an organization licensed by the NRC or an Agreement State to provide leak test kits and/or sample analysis services to other licensees and according to the kit supplier's instructions."
5. You request to perform non-routine maintenance activities for your portable gauges. Those activities were previously authorized in your license. Please review Appendix F to NUREG-1556, Volume 1, Revision 2 and your letter dated November 17, 2013, and provide information for the request.
6. Regarding the request to perform non-routine maintenance activities, please provide a confirmation for the following: a) individuals who perform non-routine maintenance will wear personal dosimetry; b) dosimetry will be exchanged at a frequency recommended by the manufacturer/vendor; c) dosimetry will be processed and evaluated by a NVLAP-approved processor; d) non-routine maintenance activities will be performed in accordance with the gauge manufacturer/vendor instructions and

recommendations; e) tests will be performed on the gauge after non-routine maintenance activities to ensure that it functions as designed before returning to routine use; f) the licensee will possess and use radiation survey instrument which is capable of detecting the type of radiation from licensed material to ensure the dose limits in 10 CFR 20.1201 or 20.1301 not exceeded and ALARA; g) radiation survey instrument will be calibrated at least annually and by a person specifically licensed by the NRC or an Agreement State to calibrate radiation detection instruments; h) radiation survey instrument will be checked for functionality prior to use (e.g., with the gauge or a check source); and i) records of radiation surveys and instrument calibration will be maintained for 3 years after the record is made in accordance with Title 10 of the Code of Federal Regulations (10 CFR) Part 20.2103.

7. Provide a copy of the delegation of authority for the Radiation Safety Officer (a sample is in Appendix D in NUREG-1556, Volume 1, Revision 2).

To continue the review of your application, we request that you submit your response under a dated and signed cover letter by April 8, 2024. In the cover letter, please reference the license number and Mail Control No. 639236. 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

Senior Health Physicist/License Reviewer

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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>

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

NRC License Fees: <https://www.nrc.gov/about-nrc/regulatory/licensing/fees.html>

Materials Licensees Toolkits: <https://www.nrc.gov/materials/miau/mat-toolkits.html>