



July 11, 2024

Mr. Jason VonEhr
U.S. Nuclear Regulatory Commission
Nuclear Materials Safety Region I
2100 Renaissance Boulevard
King of Prussia, PA 19406-2713

RE: Radioactive Materials License Number 47-11451-01
Docket Number: 030-06692
Mail Control Number: 639368

Dear Mr. VonEhr:

This is in response to your letter of July 9, 2024 which you requested additional clarifying information regarding the renewal of the above referenced radioactive materials license. Our reply is enumerated in the same manner as your letter.

1. This correspondence is being signed by the plant manager in accordance with your request. His signature confirms that he has reviewed and concurred with the application, the subsequent changes to the application and all the statements and representations contained therein.
 2. Regarding the SSDR:
 - a. This is confirmation of the acceptance of the generalized authorization.
 - b. This is confirmation that the USNRC should proceed to add any compatible source authorization.
 - c.i. We confirm that Eckert & Ziegler Isotope Products model NFS series can be struck from the license.
 - c.ii. Eckert & Ziegler Isotope Products model N-252 and Sodern model NEM16 do not need to be added to the license.
 - ciii. Authorization is requested for the model "Omni"
 - d. The Thermo Gamma Metrics CBX at Martinsburg is configured for the analysis of "non-hydrogenous materials" used in cement manufacturing, including limestone, clay, shale, sand and iron ore. This is in contrast to hydrocarbon-based materials such as coal.
 3. This is to confirm that John Palmer is our RSO.
 4. This is to confirm the following:
"The location of the gauge is compatible with the 'Conditions of Normal User' and 'Limitations and/or Other Considerations of Use' on the Sealed Source and Device registration certificate."
- And,
- "The fixed gauge is secured to prevent unauthorized removal or access (e.g., located in a locked room, permanently mounted, or chained and locked to a storage rack."*



5. This is to confirm that the Company does not use fixed gauges at temporary jobsites.
6. Please see the following:
 - a. This is to confirm that *"Replacement components, parts, or other materials (e.g., lubricants) other than those supplied, specified or recommended by the manufacturer, or distributor are evaluated to ensure that they do not degrade the engineering safety analysis performed and accepted as part of the Sealed Source Device Registration certificate"*
 - b. Please note the revised Radiation Protection Manual.
 - c. This is confirmation that non-routine activities include only those authorized fixed gauges containing Cs-137 and Co-60.
 - d. Please note the revised Radiation Protection Manual. This is also to confirm that if a more robust survey is necessary to perform non-routine tasks, it will be obtained prior to performing the task or the task will not be performed.
7. This is to confirm that the name on the application should be Argos North America Corporation.

As a final note, you provided multiple requests for clarification or edits to the Radiation Protection Manual that was submitted in the renewal. Please see the attached revised copy with the tracking of those changes for your easy read. Upon acceptance of your perusal, a final copy with the tracked changes accepted will be prepared and forwarded to your office. In addition, please replace the annual ALARA checklist that was submitted with the renewal with the USNRC Appendix E checklist from your NUREG 1556. This document will now be a part of the official submittal for renewal.

If you have any additional questions, please contact our RSO, John Palmer, our consultant, Ben Warren of Applied Environmental Consulting, Inc. at (352) 215-1231 or me. Thank you for your attention to this matter.

Sincerely,

Michael Saeger
Plant Manager
Email: msaeger@argos-us.com
Cell Phone: 843-860-7272

Enc. Radiation Protection Manual Rev. 6
USNRC NUREG Appendix E – Annual ALARA Checklist

C: John Palmer, RSO
Dina Didion, EH&S Manager
Ben Warren, AEC