

**From:** [Paul R. Steinmeyer](#)  
**To:** [Lisa Forney \(She/Her/Hers\)](#)  
**Subject:** [External\_Sender] Re: Follow-Up Items  
**Date:** Thursday, August 22, 2024 8:59:54 PM

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Hello Lisa,

### *Columbia Location*

*It is my understanding that the Columbia location was inactive/not used for licensed work from 2013 – 2020. Is this correct?*

That is correct.

*I reviewed a decommissioning report dated 05/20/2020. Is this the most current version of the report?*

Yes.

*If a more current version exists, please provide it.*

No work has been performed in that location since that time. No more current version exists.

*At any point, did you provide notification to the NRC that site activities were discontinued?*

I do not believe so.

*In December of 2020, you committed to submitting an updated report for this location. Was a report sent to the NRC?*

It was not.

*Why was no action taken to remove the Columbia location from the license prior to the 2024 inspection?*

Several

- Manchester Location
  - It is my understanding that your son Ben (who left employment on 12/15/2021) was responsible for much of the cleaning and decommissioning activity at the Manchester facility. Is this correct?
  - At what point was work at the Manchester location discontinued?
  - When did the decommissioning activity begin and conclude?
  - I reviewed a decommissioning report dated 12/27/2023. Is this the most current version?
  - If a more current version exists, please provide it.
  - At any point, did you provide notification to the NRC that site activities were discontinued?
  
- HAZMAT Employee Training & Shipping Papers
  - It is my understanding that you are the sole person who prepares radioactive shipments and that you transport sources to a site in Maine. Is this true?
  - Please provide the shipping papers for the Gd-153 shipments.
  - Please provide documentation of HAZMAT Employee training.

- Training
  - You provided a roster of training attendees. Please provide documentation of the scope of the training.
  
- Inventory
  - You provided a copy of the most current inventory.
  - At what frequency were inventories performed?
  - Who is responsible for completing the inventories?
  - Please provide documentation of inventories completed throughout this review period (since 2020).
  
- The version of the Radiation Safety Manual provided for review at the time of inspection still referenced the sandblast room, which has since been decommissioned. Please ensure that the manual is updated appropriately.
  
- Public Dose Survey Records (08/16/2024 version provided)
  - Please provide documentation of any surveys to ensure compliance with public dose limits completed from 2020 to 08/16/2024.
  
- Records of Receipt, Disposal & Transfer
  - Please provide copies of these records for shipments during the review period.

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On 2024-08-19 16:46, Lisa Forney (She/Her/Hers) wrote:

Paul,

Thank you for your email and for the information that you submitted. I am reviewing the information and will follow-up if any areas require clarification.

As I have been reviewing my inspection notes, I need to gain a better understand of a few items. Specifically,

- Columbia Location

It is my understanding that the Columbia location was inactive/not used for licensed work from 2013 – 2020. Is this correct?

- I reviewed a decommissioning report dated 05/20/2020. Is this the most current version of the report?
  - If a more current version exists, please provide it.
  - At any point, did you provide notification to the NRC that site activities were discontinued?
  - In December of 2020, you committed to submitting an updated report for this location. Was a report sent to the NRC?
  - Why was no action taken to remove the Columbia location from the license prior to the 2024 inspection?
- Manchester Location
    - It is my understanding that your son Ben (who left employment on 12/15/2021) was responsible for much of the cleaning and decommissioning activity at the Manchester facility. Is this correct?
    - At what point was work at the Manchester location discontinued?
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    - If a more current version exists, please provide it.
    - At any point, did you provide notification to the NRC that site activities were discontinued?
- HAZMAT Employee Training & Shipping Papers
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    - Please provide the shipping papers for the Gd-153 shipments.
    - Please provide documentation of HAZMAT Employee training.
- Training
    - You provided a roster of training attendees. Please provide documentation of the scope of the training.
- Inventory
    - You provided a copy of the most current inventory.
    - At what frequency were inventories performed?
    - Who is responsible for completing the inventories?
    - Please provide documentation of inventories completed throughout this review

period (since 2020).

- The version of the Radiation Safety Manual provided for review at the time of inspection still referenced the sandblast room, which has since been decommissioned. Please ensure that the manual is updated appropriately.
  
- Public Dose Survey Records (08/16/2024 version provided)
  - Please provide documentation of any surveys to ensure compliance with public dose limits completed from 2020 to 08/16/2024.
  
- Records of Receipt, Disposal & Transfer
  - Please provide copies of these records for shipments during the review period.

Thank you for your cooperation.

Lisa A. Forney, MEPC  
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**From:** Paul R. Steinmeyer <prstein@radpro.com>  
**Sent:** Monday, August 19, 2024 12:10 PM  
**To:** Lisa Forney (She/Her/Hers) <Lisa.Forney@nrc.gov>  
**Subject:** [External\_Sender] Re: Follow-Up Items

Hello Lisa,

Ben Steinmeyer worked for RSA from 6/19/2017 about 12/15/2021. Jon Steinmeyer worked at RSA from 2/12/2014 to about 6/11/2018.

I've attached "2021 Fourth Quarter Dosimetry.pdf," covering Ben's final dosimetry. This includes is total cumulative lifetime dose, which includes the time in question.

I've attached "RSA Inventory 2024.pdf" for our inventory. The first page is the totals by isotope, the remainder lists by individual source.

Also attached are the audits (four files) and training records.

"Public Dose Survey.pdf" is attached.

"RSA Rad Safety Manual rev 3 (2023).pdf" contains our current operating and emergency procedures, as submitted with our license amendment.

Regarding the overall business scope, the majority of our daily work does consist primarily of what you describe. However, I'm not comfortable with reducing the scope of our license quite yet. I'm working with Chase Environmental for disposal of our excess material, and I am in talks with another (New Hampshire) licensee to take over much of the business. Should the business transfer occur, that would likely be accompanied by a transfer of some of the licensed materials to their license, appropriate disposition (or retention) of the remaining materials, and decommissioning of all or most of the Hebron facility. It is likely that some fashion of substantially reduced license will be maintained.

I will submit the paperwork as soon as possible to remove the Manchester and Columbia sites from our license.

Best Regards,

Paul

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On 2024-08-13 12:03, Lisa Forney (She/Her/Hers) wrote:

Paul,

Thank you for speaking with me earlier today. As we discussed, there were a few items that were unclear at the time of inspection, and I am requesting that you follow-up with me via email by Monday, August 19, 2024. As I have several items requiring clarification, it is ok to send files in separate messages if that is your preference.

- Dates of employment for Ben and John Steinmeyer.
- Dosimetry records or a prospective evaluation for Ben Steinmeyer (decommissioning work at the Manchester location).
- Inventory of Isotopes currently in possession/storage.
- Annual program audits since 2020.

- Safety training for workers who use/work around radioactive materials since 2020.
- Public Dose Surveys
- Current Operating and Emergency Procedures

Based upon discussions, it is my understanding that your business has reduced in scope to instrument calibration, leak testing and the recovery of orphaned isotopes discovered at solid waste facilities. Is this correct? If not, please specify the scope of your current operations.

It is my understanding that decommissioning of the Columbia and Manchester locations is complete. As discussed, locations no longer in use on the license can be removed via an amendment request. Attached please find NRC Form 313 (ML13083A072), which would need to be completed. The form and appropriate documentation to support the request may be directed to [R1DRSSMail.Resource@nrc.gov](mailto:R1DRSSMail.Resource@nrc.gov). It is best to direct any licensing requests to this resource account, which is checked regularly and the request would be assigned to a reviewer.

For your reference, I am also attaching NRC Form 314 (ML13083A079), which would need to be completed in the event that you may wish to terminate your license. The form and adequate supporting documentation would need to be submitted to the same resource email address for processing and review ([R1DRSSMail.Resource@nrc.gov](mailto:R1DRSSMail.Resource@nrc.gov)).

Thank you for your cooperation. Please contact me at your convenience with any questions.

Have wonderful day!

Lisa A. Forney, MEPC

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