



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION I
475 ALLENDALE ROAD – SUITE 102
KING OF PRUSSIA, PA 19406-1415

December 18, 2024

Luis O. Garcia, P.E., President
Geo Cim, Inc.
Amelia Distribution Center
Emma Street, Lot 26A
Guaynabo, PR 00968

SUBJECT: GEO CIM, INC., REQUEST FOR ADDITIONAL INFORMATION, MAIL
CONTROL NO. 642282

Dear Luis Garcia:

This is in reference to your revised application dated November 6, 2024, requesting to renew NRC License No. 52-17776-02. In order to continue our review, we need the following additional information:

1. Your revised application dated November 6, 2024, included a request regarding the performance of non-routine maintenance, specifically the detachment of the source rod to perform certain maintenance activities on portable nuclear gauges. Your revised application appeared to suggest that these activities have been performed before. The NRC reviewed your inspection records back to May 2005, and no mention was found of Geo Cim ever performing non-routine maintenance activities. In addition, the NRC reviewed your license documents back through February 1984 and found no mention of a request nor corresponding authorization to perform non-routine maintenance.

Please confirm whether or not Geo Cim has ever performed non-routine maintenance activities, and if so, when and how often these activities have occurred, who performed these activities, and their qualifications, if any, related to these activities. If available, please submit any records associated with these activities.

2. Items 3 through 6 below are necessary to support a request to perform non-routine maintenance activities as described in your revised application. If you wish to withdraw your request for the authorization to perform non-routine maintenance, please clearly state this and no further response would be required for any of the below items. However, if you wish to continue and pursue this authorization, please review and address each Items 3 through 6 below.
3. NUREG-1556, Volume 1, Revision 2, Appendix F, describes that personnel performing non-routine maintenance require specialized training, usually from the manufacturer, to perform training. Your revised application requested authorization for Rolando Davila, and described that Rolando Davila had 35 years of experience *using* and *handling* nuclear gauges. Your revised application further included certificates for training for Rolando Davila from 1987, 1999, and 2024, and a resume describing Rolando Davila's professional certifications and training, including the safe use of nuclear gauges and U.S. Department of Transportation Hazardous Materials Transportation training.

However, the above training and experience does not address the performance of non-routine maintenance. Please provide evidence and/or descriptions of Rolando Davila's training and experience to support an authorization to perform non-routine maintenance, limited to the detachment of the source rod as described in your revised application.

4. If you wish to pursue an authorization for non-routine maintenance, the NRC will require a more stringent commitment related to the calibration of the radiation survey meter(s) used to perform this activity. Please commit to the below:

"Radiation monitoring instruments used to support non-routine maintenance activities will be calibrated before first use, at least annually thereafter, and after any repair, by a vendor who is licensed by the NRC or an Agreement State to perform instrument calibrations."

Please note that records of instrument calibration must be maintained for 3 years after the record is made in accordance with 10 CFR 20.2103 "Records of Surveys."

5. Your revised application did not describe what type of radiation survey meter will be used to support the non-routine maintenance activities.
 - a. Please provide a description of your radiation survey meter that will be used to support the non-routine maintenance activities (manufacturer, model), and confirm that it's capable of: (1) detecting gamma radiation; and (2) reading a range of at least as low as 1 millirem/hour and at least as high as 50 millirem/hour; and
 - b. Commit to having and using a calibrated radiation survey meter in the future that is capable of: (1) detecting gamma radiation; and (2) reading a range of at least as low as 1 millirem/hour and at least as high as 50 millirem/hour; at any time non-routine maintenance activities are performed.
6. Your revised application included the procedure to perform non-routine maintenance activities, limited to the detachment of the source rod. Please revise and re-submit the procedure to include two further actions:
 - a. Require the performance of a function check on the radiation survey meter, using either a check source or the portable nuclear gauge to verify the radiation survey meter is responding to radiation.
 - b. Require the performance of a survey of the portable nuclear gauge before detaching the source rod and after the re-installation of the source rod, and comparison between these surveys to provide a basis for confidence that the source rod and shielding were configured correctly.

We will continue our review upon receipt of this information. Please reply to my attention at:

R1DRSSMail.Resource@nrc.gov

Reference – Jason vonEhr

Mail Control No. 642282

In order to continue prompt review of your application, we request that you submit your response to this letter within 30 calendar days from the date of this letter.

An electronic version of the NRC's regulations is available on the NRC Web Site at: www.nrc.gov. Additional information regarding medical uses of radioactive materials may be obtained on the NRC Web Site at: <http://www.nrc.gov/materials/miau/med-use-toolkit.html>. This site also provides the updated Training and Experience NRC Form 313A series of forms and guidance, as well as information on the revised regulations for naturally-occurring and accelerator-produced radioactive materials (NARM).

In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice and Procedure," a copy of this letter will be available electronically for public inspection in the NRC Public Document Room or from the NRC's document system (ADAMS). ADAMS is accessible from the NRC Web Site at: <http://www.nrc.gov/reading-rm/adams.html>. Please be aware that you may request that certain portions of your submittal to NRC be withheld from public disclosure as proprietary information. To do this, you must execute an affidavit as specified in 10 CFR 2.390. You must list all portions that you wish to be held proprietary, along with your reasoning as to why that is appropriate. While it is allowable, please refrain from submitting proprietary information in support of a license unless necessary. Keep in mind that all NRC licenses are considered to be in the public domain, and therefore may be viewed by any member of the public who requests to see them.

If you have any questions regarding this request for additional information, please contact me at (610) 337-5370 or via electronic mail at Kelli.Trotter@nrc.gov.

Thank you for your cooperation.

Sincerely,

Jason vonEhr, Senior Health Physicist
Medical and Licensing Assistance Branch
Division of Radiological Safety and Security
Region I

License No. 52-17776-02
Docket No. 030-20896
Mail Control No. 642282

cc: Rolando Davila, RSO

GEO CIM, INC. AMELIA DISTRIBUTION CENTER, REQUEST FOR ADDITIONAL
INFORMATION, MAIL CONTROL NO. 642282 DATED DECEMBER 19, 2024

SUNSI Review Complete: JEV

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