UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION III
2056 WESTINGS AVENUE, SUITE 400
NAPERVILLE, IL 60563-2657

December 26, 2024

Richard Karrmann
Radiation Safety Officer
JRGO LLC
d/b/a Integrity Assessment Group
7445 Whitepine Rd.
Richmond, VA 23237

Dear Mr. Karrmann:

This letter is regarding the application dated July 19, 2024, signed by Cory Hoffmann, Secretary and Treasurer, for the renewal of your U.S. Nuclear Regulatory Commission (NRC) Materials License No. 04-24888-01.

The U.S. NRC's guidance document for your type of license, which I refer to below as "the guidance," is NUREG-1556, Volume 2, Rev. 1, dated February 2016, "Consolidated Guidance About Materials Licenses: Program-Specific Guidance About Industrial Radiography Licenses," This guidance is available on the U.S. NRC website at: https://www.nrc.gov/reading-rm/doc-collections/nuregs/staff/sr1556/v2/

Upon review of the request, I identified the following areas requiring additional or clarifying information:

1. Section 8.5.1, "Sealed Sources and Devices," of the guidance, specifies that the application should list each requested source assembly, exposure device, or source changer to be possessed.

   Your application omits previously authorized source changers. Further, your requested maximum possession limit of iridium-192 and selenium-75 varies from your current license authorization and will result in a decrease in your total authorized possession limit.

   Confirm that you are seeking to remove previously authorized source changers and reduce your total authorized possession limit. As applicable, provide records of transfer/disposal of licensed material previously in your possession.

2. Section 8.5.1, "Sealed Sources and Devices," of the guidance, specifies that all associated equipment must be compatible with the radiographic exposure devices, source changers, and radiography source assemblies.

   Confirm that all associated equipment will be compatible with requested radiographic exposure devices, source changes, and radiography source assemblies.

3. Section 8.5.1, “Sealed Sources and Devices,” of the guidance, along with Title 10 of the *Code of Federal Regulations* (10 CFR) §34.20, indicates that only radiographic exposure devices, radiography source assemblies and associated equipment meeting the requirements of 10 CFR §34.20 may be used in industrial radiography operations.

   Confirm that all radiography exposure devices, radiography source assemblies and associated equipment will adhere to the regulatory requirements specified in 10 CFR §34.20, including the requirements of ANS N432-1980, “American National Standard for Gamma Radiography - Specifications for Design and Testing of Apparatus,” which are incorporated in the regulation by reference.

   For additional information and guidance, refer to American National Standard N432-1980 and/or the redesignated and revised ANSI/HPS N43.9-2015, “American National Standard for Gamma Radiography— Specifications for the Design, Testing, and Performance Requirements for Industrial Gamma Radiography System Equipment Using Radiation Emitted by a Sealed Radioactive Source.”

4. Section 8.7.1, “Radiation Safety Officer,” of the guidance, identifies that the Radiation Safety Officer (RSO) is responsible for the oversight of licensed operations. The RSO must have sufficient organizational authority and management prerogative to enforce appropriate radiation protection rules, standards, and practices.

   Submit an updated delegation of authority supporting your continuing appointment as RSO. An example Delegation of Authority is provided in Appendix O, “Model Delegation of Authority,” of the guidance. The completed Delegation of Authority should be signed by the appointed RSO and a management representative. Include the printed name, title and date for each individual signing.

5. Section 8.8, “Item 8: Training for Radiographers and Radiographer’s Assistants,” of the guidance, identifies that the license application should include a copy of the typical examination provided to radiography personnel, including the answer key.

   Section 4 of QCP 99-02, Rev. 11, “Training Testing and Qualification of Radiographic Personnel,” refers to the written examinations provided to radiography personnel. Though, a copy of the typical examination provided was not located with your submission.

   Please provide a copy of the typical examination(s) provided to radiography personnel, including the answer key.

6. Section 8.8, “Item 8: Training for Radiographers and Radiographer’s Assistants,” and 10 CFR §34.43, specifies that all radiographers be certified by a certifying entity.

   Your application does not describe your procedures for verifying and documenting the certification status of radiographers and for verifying that their certification remains valid.

   Submit applicable revisions to your procedures for verifying and documenting the certification status of radiographers and verifying that their certification remains valid. As a minimum, your procedures for newly hired, previously certified individuals should require documentation that you contacted the certifying entity and confirmed the

certification. Your procedures should also ensure that you are aware of certification expiration dates and that individuals with expired certifications do not act as radiographers.

7. Section 8.8, “Item 8: Training for Radiographers and Radiographer’s Assistants,” and 10 CFR §34.43, require the performance of semiannual audits of radiographers and radiographer’s assistants.

   Your application does not describe your procedures for assessing the job performance of each radiographer and radiographer’s assistant.

   Therefore, please submit applicable revisions to your procedures for assessing the job performance of each radiographer and radiographer’s assistant at intervals not to exceed 6 months, as described in 10 CFR §34.43(e). Appendix F, “Six-Month Radiographer/Radiographer’s Assistant Inspection Checklist,” of the guidance provides a sample checklist.

8. 10 CFR §30.33(a) identifies that your equipment and facilities must be adequate to protect health and minimize danger to life or property.

   While your application identifies your intent to perform in-house survey meter calibrations, the submitted facility diagram and description does not identify the location of your calibration range within your facility.

   Submit a revised facility diagram and description identifying your survey meter calibration range. Identify safety equipment available to staff when performing survey meter calibrations.

9. Section 8.10.9.2, “Operating and Emergency Procedures: Methods and Occasions for Conducting Required Radiation Surveys,” describes that radiation surveys must be performed during use, movement, and storage of licensed material to ensure its safe use and to comply with regulatory requirements.

   While Section 19, "Summary of Required Radiation Surveys," of your QCP 203, Rev. 27, “Radiographic Operating and Emergency Procedures,” includes many of the applicable survey requirements, your procedures do not clearly address all of the regulatory requirements specified below.

   - 10 CFR §20.1302(a)(1), “Compliance with dose limits for individual members of the public”
   - 10 CFR §20.1906, “Procedures for receiving and opening packages”
   - 49 CFR §172.403, “Class 7 (radioactive) material”
   - 49 CFR 173.441, “Radiation level limitations and exclusive use provisions”

   To ensure compliance with the regulatory requirements, submit applicable revisions to your procedure addressing all of the above survey requirements. For additional information, please refer to Table 8-2, “Surveys Required for Radiographic Operations,” of the guidance.

10. Section 8.10.9.9, “Procedure for Identifying and Reporting Defects and Noncompliance As Required By 10 CFR Part 21,” of the guidance, identifies equipment defect reporting requirements specified in 10 CFR §21.21, 10 CFR §30.50, and 10 CFR §34.101(a)(3).

    Information Notice 91-39, “Compliance with 10 CFR Part 21, Reporting of Defects and Noncompliance,” dated June 17, 1991, provides guidance on determining whether a safety hazard exists and sample procedures for identifying and reporting defects. The Information Notice can be found on the NRC’s Generic Communications webpage under Information Notices at https://www.nrc.gov/reading-rm/doc-collections/gen-comm/.

    As this item is only advisory, no specific response or action is needed.

11. Section 8.10.9.10, “Notification of Proper Persons in the Event of an Accident or Emergency,” of the guidance, states that your Operating and Emergency Procedures must ensure that appropriate notifications are made to the U.S. NRC during and after an incident.

    Section C, “Emergency Procedures,” of your QCP 203, Rev. 27, “Radiographic Operating and Emergency Procedures,” describes applicable notification and reporting requirements. Though, your procedures unnecessarily restrict notification to be made exclusively by the Corporate RSO or senior Corporate Staff. Further, the accompanying Emergency Phone List omits all applicable emergency phone numbers.

    To ensure compliance with the immediate reporting requirements specified in regulation (e.g., notification of theft or loss or radioactive material), your procedures should be revised to direct radiography personnel and/or the Radiation Safety Officer to immediately notify the local law enforcement agency and the U.S. NRC’s Operations Center. Please also update your Emergency Phone List to include the U.S. NRC’s Operations Center’s phone number, (301) 951-0550. For a list of applicable notification and reporting requirements, please refer to Table 8-3, “Regulatory-Required Notifications,” of the guidance.

In accordance with 10 CFR §2.390 of the NRC’s “Rules of Practice,” a copy of this letter and its enclosure 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 website at https://www.nrc.gov/reading-rm/adams.html.

To continue review of your request, please submit your response to this letter within 20 calendar days from the date of this letter. In your response, please refer to the license, docket, and control number specified below. I will assume that you do not wish to further pursue this licensing action if I do not receive a reply within the specified timeframe noted above.

If you have questions, require additional time to respond, or require clarification on any of the information stated above, I encourage you to contact me at (630) 829-9737 or via e-mail at Jason.Kelly@nrc.gov.

Sincerely,

Digitally signed by JASON KELLY
Date: 2024.12.26 16:23:44 -06'00'
Adobe Acrobat version: 2024.005.20320

Jason M. Kelly, MPH, CPH
Health Physicist
Materials Licensing Branch

Control No.: 641907
Docket No.: 030-38303
License No.: 04-24888-01