



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

March 11, 2025

Jose Castillo, Radiation Safety Officer
DMY Engineering Consultants Inc.
4170 Lafayette Center Drive
Suite 500
Chantilly, VA 20151

SUBJECT: DMY ENGINEERING CONSULTANTS, INC., REQUEST FOR ADDITIONAL
INFORMATION, MAIL CONTROL NO. 644838

Dear Jose Castillo,

This is in reference to your application dated January 08, 2025, requesting a new NRC License. In order to continue our review, we need the following additional information:

1. The submitted NRC Form 313 listed the Radiation Safety Officer the certifying officer whereas your Virginia license submitted in the application listed a vice president. Pursuant to Title 10 of the *Code of Federal Regulations* (10 CFR) 30.32(c), each application must be signed by the applicant or licensee or a person duly authorized to act for and on behalf of the applicant or licensee.

The signature on an application acknowledges the licensee's commitments and responsibilities for the following:

- radiation safety, security, and control of radioactive materials and compliance with regulations
- completeness and accuracy of the radiation safety records and all information provided to the NRC (10 CFR 30.9, "Completeness and accuracy of information")
- knowledge about the contents of the license and application
- compliance with current NRC and U.S. Department of Transportation (DOT) regulations, the licensee's operating, emergency, and security procedures, and NRC license commitments
- commitment to provide adequate resources (including space, equipment, personnel, time, and, if needed, contractors) to the radiation protection program to ensure that the public and workers are protected from radiation hazards and compliance with regulations is maintained
- commitment to report defects, noncompliances, or reportable events in accordance with regulations
- selection and assignment of a qualified individual to serve as the radiation safety officer (RSO) for licensed activities and confirmation that the RSO has independent authority to stop unsafe operations and will be given sufficient time to fulfill radiation safety duties and responsibilities
- commitment to ensure that radiation workers have adequate training
- prevention of discrimination of employees engaged in protected activities (10

- CFR 30.7, "Employee protection")
- commitment to provide information to employees about the employee protection and deliberate misconduct provisions in 10 CFR 30.7, "Employee protection," and 10 CFR 30.10, "Deliberate misconduct"
- commitment to obtain the NRC's prior written consent before transferring control of the
- license (see Section 9.1, "Timely Notification of Transfer of Control," of this report)
- notification of the appropriate NRC regional administrator, in writing, immediately following the filing of a petition for voluntary or involuntary bankruptcy [10 CFR 30.34(h)], as discussed further in Section 8.2.1, "Notification of Bankruptcy Proceedings," of this report

Provide the following:

Statement confirming that the radiation safety officer is duly authorized to act for and on behalf of the applicant or licensee.

A signed Delegation of Authority for the Radiation Safety Officer (see attached model delegation).

2. **NUREG-1556 Vol. 1, Rev. 2, Section 8.5**, "Radioactive Material" applicants must provide the radionuclide and nominal activity for each requested sealed source, the manufacturers or distributor's name, and model number for each device, and the number of gauges for each model. Licensees will be authorized to possess and use only those sealed sources and devices specifically approved and registered by the NRC or an Agreement State.

Your application did not specify the request number of gauges for each model.

Provide the following:

Confirm if the inventory submitted in the application dated January 8, 2025, is the requested manufacturers or distributor's name, and model number for each device, and the number of gauges for each model for the NRC license.

3. Please fill out the attached NUREG 1556 Volume 1, Revision 2, "Program Specific Guidance About Portable Gauge Licenses." The full document can be found online here: <https://www.nrc.gov/reading-rm/doc-collections/nuregs/staff/sr1556/v1/index.html>.
4. Please provide a receipt from pay.gov or other proof of payment for the license application fee.

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

R1DRSSMail.Resource@nrc.gov

Reference – **Casey Alldredge**

Mail Control No. **644838**

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 use of radioactive materials may be obtained on the NRC Web Site at: <http://www.nrc.gov/materials/miau/mat-toolkits.html>. This site also provides the link to the toolbox for updated information on the revised regulations for naturally-occurring and accelerator-produced radioactive materials (NARM).

If you have any questions regarding this request for additional information, please contact me at **817-200-1546** or via electronic mail at Casey.Aldredge@nrc.gov copying Candace.Krout@nrc.gov.

Thank you for your cooperation.

Sincerely,

Casey Alldredge, Health Physicist
U.S. Nuclear Regulatory Commission

License No. 45-35776-01
Docket No. 3039403
Mail Control No. 644838

Enclosures: Model Delegation of Authority Memo
NUREG 1556 Volume 1, Revision 2 Checklist

SUBJECT: DMY ENGINEERING CONSULTANTS, INC., REQUEST FOR ADDITIONAL INFORMATION, MAIL CONTROL NO. 644838 DATED MARCH 11, 2025

SUNSI Review Complete: Casey Alldredge

After declaring this document "An Official Agency Record" it **will** be released to the Public.

OFFICE	RI:DRSS	RI:DRSS		
NAME	CKrout	CAlldredge		
DATE	3/11/25	3/11/25		

OFFICIAL RECORD COPY

Model Delegation of Authority to Radiation Safety Officer

Memo To: Radiation Safety Officer
From: Chief Executive Officer
Subject: Delegation of Authority

You, _____, have been appointed radiation safety officer and are responsible for ensuring the safe use of radiation. You are responsible for managing the Radiation Protection Program; identifying radiation protection problems; initiating, recommending, or providing corrective actions; verifying implementation of corrective actions; stopping unsafe activities; and ensuring compliance with regulations. You are hereby delegated the authority necessary to meet those responsibilities, including prohibiting the use of byproduct material by employees who do not meet the necessary requirements and shutting down operations, when justified, to maintain radiation safety. You are required to notify management if staff does not cooperate and does not address radiation safety issues. In addition, you are free to raise issues with the U.S. Nuclear Regulatory Commission at any time. It is estimated that you will spend _____ hours per week conducting radiation protection activities.

Signature of Management Representative

Date

I accept the above responsibilities,

Signature of Radiation Safety Officer

Date

cc: Affected department heads

**Items 7 through 11: Training and Experience,
Facilities and Equipment, Radiation Safety Program,
and Waste Disposal**

Item No. and Title	Suggested Response	Yes	Alternative Procedures Attached
7. INDIVIDUAL(S) RESPONSIBLE FOR RADIATION SAFETY PROGRAM AND THEIR TRAINING AND EXPERIENCE—RADIATION SAFETY OFFICER Name: _____	Documentation demonstrating the proposed radiation safety officer's training and experience (e.g., certificate of completion of the RSO's course and/or the authorized user's course).	Submit applicable documentation.	
8. TRAINING FOR INDIVIDUALS WORKING IN OR FREQUENTING RESTRICTED AREAS	Before using licensed materials, authorized users will have successfully completed one of the training courses described in the "Criteria" part of the section titled, "Training for Individuals Working in or Frequenting Restricted Areas" in NUREG-1556, Vol. 1, Rev. 2, "Consolidated Guidance About Materials Licenses: Program-Specific Guidance About Portable Gauge Licenses."	<input type="checkbox"/>	<input type="checkbox"/>
9. FACILITIES AND EQUIPMENT	Provide a facility diagram for each permanent portable gauge storage location. Include on the diagram the use of adjacent areas (including above and below), and information relevant to public dose and security as discussed in Sections 8.10.5, "Public Dose," and 8.10.6, "Operating, Emergency, and Security Procedures," respectively, in NUREG-1556, Vol. 1, Rev. 2, "Consolidated Guidance About Materials Licenses: Program-Specific Guidance About Portable Gauge Licenses"	Submit applicable documentation.	

Item No. and Title	Suggested Response	Yes	Alternative Procedures Attached
10.1 RADIATION SAFETY PROGRAM—AUDIT PROGRAM	The applicant should not submit its audit program to the NRC for review during the licensing phase. The audit program will be reviewed during NRC inspections.	Need Not Be Submitted with Application	
10.2 RADIATION SAFETY PROGRAM—RADIATION MONITORING INSTRUMENTS	We will either possess and use, or have access to and use, a radiation survey meter that meets the criteria in the section titled, "Radiation Safety Program—Radiation Monitoring Instruments" in NUREG-1556, Vol. 1, Rev. 2, "Consolidated Guidance About Materials Licenses: Program-Specific Guidance About Portable Gauge Licenses," in the event of an incident.	<input type="checkbox"/>	<input type="checkbox"/>
10.3 RADIATION SAFETY PROGRAM—MATERIAL RECEIPT AND ACCOUNTABILITY	Physical inventories will be conducted every 6 months or at other intervals approved by the NRC to account for all sealed sources and devices received and possessed under the license. AND We will develop, implement, and maintain procedures for ensuring accountability of licensed materials at all times.	<input type="checkbox"/>	<input type="checkbox"/>
10.4 RADIATION SAFETY PROGRAM—OCCUPATIONAL DOSE	We 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). OR We will provide and require the use of individual monitoring devices (dosimetry). All personnel dosimeters that require processing to determine the radiation dose will be processed and evaluated by a NVLAP-approved processor.	<input type="checkbox"/> <input type="checkbox"/>	<input type="checkbox"/>

Item No. and Title	Suggested Response	Yes	Alternative Procedures Attached
10.7 RADIATION SAFETY PROGRAM—LEAK TEST	<p>Leak tests will be performed at intervals approved by the NRC or an Agreement State and specified in the SSD registration certificate. Leak tests will be performed by an organization licensed by the NRC or an Agreement State to provide leak testing services to other licensees; or by 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. Records of leak test results will be maintained.</p> <p>OR</p> <p>We will implement the model leak test program published in Appendix I of NUREG-1556, Volume 1, Revision 2, "Consolidated Guidance About Materials Licenses: Program-Specific Guidance About Portable Gauge Licenses." Records of leak tests will be maintained.</p>	<p><input type="checkbox"/></p> <p><input type="checkbox"/></p>	<p><input type="checkbox"/> For this item, checking this box indicates that alternative equipment and/or procedures will be provided as part of the application and that records of leak tests will be maintained.</p>

