

From: [Magdalena Gryglak](#)
To: rayacarlson@att.net; [Eric Ramsay](#)
Cc: [Darrell Fisher](#)
Subject: Amendment Request to add new services for Radiological Physics Service, Inc. - NRC license no. 21-26253-01
Date: Monday, July 7, 2025 8:20:00 AM

Good morning,

In a letter dated May 28, 2025, Radiological Physics Service, Inc. requested to receive and install Kr-85 sources into gauging devices. As we discussed on 7/3/25 and per guidance in NUREG 1556, Volume 18, this activity is a high-risk activity and NRC staff will need additional information outlined below. Please use NUREG 1556, Volume 18, for additional guidance when preparing your response. The guidance is available at <https://www.nrc.gov/reading-rm/doc-collections/nuregs/staff/sr1556/v18/index.html>.

In a signed and dated letter by R. Carlson, please provide the following information:

1. Please provide RSO qualifications to work with higher activity sources (experience working with the type and quantity of material)
2. Please name an Authorized User to perform the new activity and the individual's qualifications (experience working with the type and quantity of material)
3. Please provide procedures to install the Kr-85 source into the device (please see section 8.10.1 of the guidance, which also discusses an agreement with the customer)
4. Emergency procedure (Section 8.10.1 provides a summary of emergency scenarios, which may include high dose rate alarm; leaking source; stuck source; radioactive spill; natural phenomena, such as fire, earthquake, and tornados; medical emergency; contaminated or injured individual; inhalation or ingestion due to aerosolized contamination; radiation overexposure; unshielded source; device malfunction; device toppled over or damaged; activation of a safety or security alarm; lost or missing radioactive material, and transportation accident involving the transport of licensed material.
5. Please provide procedures for commissioning of the device.
6. Please provide procedures for transportation, receipt of Kr-85 sources and packaging, if sources are returned to manufacturer, at temporary job sites and accountability of material
7. Please provide procedures to ensure the Kr-85 sources are secured during receipt, storage, installation, and operation.
8. Please address and describe radiation safety measures during receipt, installation, and commissioning (equipment to handle material, personnel monitoring, ALARA, methods and frequency of performing radiation surveys during receipt, installation, and commissioning)
9. Please provide the commitment (the initial renewal application did not address surveys):

“We will conduct surveys and maintain contamination levels in accordance with the survey frequencies and contamination levels published in Section 8.10.4 of NUREG–1556, Volume 18,

Revision 1, “Consolidated Guidance About Materials Licenses: Program-Specific Guidance About Service Provider Licenses.””

OR

Submit a description of an alternative survey method and frequency for demonstrating how to evaluate a radiological hazard.

10. Please address maintenance of records (define responsibilities between service provider and distributor).
11. Please address routine maintenance and non-routine maintenance, if applicable.
12. Please address waste disposal.

Please note that some questions may not be applicable or they may have been already addressed in other correspondence with the NRC staff. You may reference a specific letter and section of the letter, if applicable.

Please respond by July 14, 2025.

Thank you

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