GENTEX CORPORATION

August 27, 2025

US Nuclear Regulatory Commission
2443 Warrenville Road, Suite 210
Lisle, IL 60532

RE: Request for NRC License 21-32837-01 Amendment

To Whom It May Concern:

Gentex Corporation ("Gentex") respectfully requests that the U.S. Nuclear Regulatory Commission ("NRC") amend Gentex's NRC License 21-32837-01 ("License").

Gentex requests to change Michael Malski from an Authorized User to Radiation Safety Officer and to remove Richard Savola from the license.

If you have any questions regarding this matter, please do not hesitate to contact Justin Olejniczak, EHS Director. Mr. Olejniczak may be contacted directly at (616) 772-1800 or via email at justin.olejniczak@gentex.com.

We appreciate your consideration and attention to this matter.

Sincerely,

Scott Ryan, Vice President

Enclosure

cc: Justin Olejniczak, EHS Director – Gentex Corporation
Michael Malski, Laboratory Group Leader – Gentex Corporation
Cindy Beyer, Director of Conformance Quality – Gentex Corporation

NRC FORM 313 **U.S. NUCLEAR REGULATORY COMMISSION**
(09-11-2024)
10 CFR 30, 32, 33, 34, 35, 36, 37, 39, and 40

APPLICATION FOR MATERIALS LICENSE

APPROVED BY OMB: NO. 3150-0120 **EXPIRES: 07/31/2026**

Estimated burden per response to comply with this mandatory collection request: 4.3 hours. Submittal of the application is necessary to determine that the applicant is qualified and that adequate procedures exist to protect the public health and safety. Send comments regarding burden estimate to the FOIA, Library, and Information Collections Branch (T-6 A10M), U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001, or by email to Infocollects.Resource@nrc.gov, and the OMB Reviewer at: OMB Office of Information and Regulatory Affairs, (3150-0120), Attn: Desk Officer for the Nuclear Regulatory Commission, 725 17th Street NW, Washington, DC 20503. The NRC may not conduct or sponsor, and a person is not required to respond to, a collection of information unless the document requesting or requiring the collection displays a currently valid OMB control number.

INSTRUCTIONS: SEE THE CURRENT VOLUMES OF THE NUREG-1556 TECHNICAL REPORT SERIES ("CONSOLIDATED GUIDANCE ABOUT MATERIALS LICENSES") FOR DETAILED INSTRUCTIONS FOR COMPLETING THIS FORM: http://www.nrc.gov/reading-rm/doc-collections/nuregs/staff/sr1556/. SEND ONE COPY OF THE COMPLETED APPLICATION TO THE NRC OFFICE SPECIFIED BELOW.

APPLICATION FOR DISTRIBUTION OF EXEMPT PRODUCTS FILE APPLICATIONS WITH:

MATERIALS SAFETY AND TRIBAL LIAISON BRANCH
DIVISION OF MATERIALS SAFETY, SECURITY, STATE AND TRIBAL PROGRAMS
OFFICE OF NUCLEAR MATERIALS SAFETY AND SAFEGUARDS
U.S. NUCLEAR REGULATORY COMMISSION
WASHINGTON, DC 20555-0001

ALL OTHER PERSONS FILE APPLICATIONS AS FOLLOWS:

IF YOU ARE LOCATED IN:

ALABAMA, CONNECTICUT, DELAWARE, DISTRICT OF COLUMBIA, FLORIDA, GEORGIA, KENTUCKY, MAINE, MARYLAND, MASSACHUSETTS, NEW HAMPSHIRE, NEW JERSEY, NEW YORK, NORTH CAROLINA, PENNSYLVANIA, PUERTO RICO, RHODE ISLAND, SOUTH CAROLINA, TENNESSEE, VERMONT, VIRGINIA, VIRGIN ISLANDS, OR WEST VIRGINIA,

SEND APPLICATIONS TO:

LICENSING ASSISTANCE TEAM
DIVISION OF RADIOLOGICAL SAFETY AND SECURITY
U.S. NUCLEAR REGULATORY COMMISSION, REGION I
475 ALLENDALE ROAD, SUITE 102
KING OF PRUSSIA, PA 19406-1415
R1DRSSMail.Resource@nrc.gov
*Note: The preferred method to submit NRC Form 313 is email. Any other document (e.g., financial assurance documents) should be sent via mail.

IF YOU ARE LOCATED IN:

ILLINOIS, INDIANA, IOWA, MICHIGAN, MINNESOTA, MISSOURI, OHIO, OR WISCONSIN, SEND APPLICATIONS TO:

MATERIALS LICENSING BRANCH
DIVISION OF RADIOLOGICAL SAFETY AND SECURITY
U.S. NUCLEAR REGULATORY COMMISSION, REGION III
2056 WESTINGS AVENUE, SUITE 400
NAPERVILLE, IL 60563-2657
R3-DRSSMAIL.Resource@nrc.gov
*Note: The preferred method to submit NRC Form 313 is email. Any other document (e.g., financial assurance documents) should be sent via mail.

IF YOU ARE LOCATED IN:

ALASKA, ARIZONA, ARKANSAS, CALIFORNIA, COLORADO, HAWAII, IDAHO, KANSAS, LOUISIANA, MISSISSIPPI, MONTANA, NEBRASKA, NEVADA, NEW MEXICO, NORTH DAKOTA, OKLAHOMA, OREGON, PACIFIC TRUST TERRITORIES, SOUTH DAKOTA, TEXAS, UTAH, WASHINGTON, OR WYOMING,

SEND APPLICATIONS TO:

MATERIALS LICENSING BRANCH
DIVISION OF RADIOLOGICAL SAFETY AND SECURITY
U.S. NUCLEAR REGULATORY COMMISSION, REGION IV
1600 E. LAMAR BOULEVARD
ARLINGTON, TX 76011-4511
R4licensing@nrc.gov
*Note: The preferred method to submit NRC Form 313 is email. Any other document (e.g., financial assurance documents) should be sent via mail.

PERSONS LOCATED IN AGREEMENT STATES SEND APPLICATIONS TO THE U.S. NUCLEAR REGULATORY COMMISSION ONLY IF THEY WISH TO POSSESS AND USE LICENSED MATERIAL IN STATES SUBJECT TO U.S. NUCLEAR REGULATORY COMMISSION JURISDICTIONS.

1. THIS IS AN APPLICATION FOR *(Check appropriate item)*

- ☐ A. NEW LICENSE
- ☑ B. AMENDMENT TO LICENSE NUMBER 21-32837-01
- ☐ C. RENEWAL OF LICENSE NUMBER

2. NAME AND MAILING ADDRESS OF APPLICANT *(Include zip code)*

Gentex Corporation
600 N. Centennial St.
Zeeland, MI 49464

3. LIST ADDRESS AND/OR TEMPORARY JOB SITE (TJS) ADDRESS, WHERE LICENSED MATERIALS WILL BE USED OR POSSESSED

380 E. Riley St.
Zeeland, MI 49464

4. NAME OF PERSON TO BE CONTACTED ABOUT THIS APPLICATION

Michael Malski

BUSINESS TELEPHONE NUMBER	BUSINESS CELLULAR TELEPHONE NUMBER
616-931-3503	

BUSINESS E-MAIL ADDRESS
Michael.Malski@Gentex.com

SUBMIT ITEMS 5 THROUGH 11 ON 8-1/2 X 11" PAPER. THE TYPE AND SCOPE OF INFORMATION TO BE PROVIDED IS DESCRIBED IN THE APPLICABLE **LICENSING GUIDANCE**.

5. RADIOACTIVE MATERIAL
   a. Element and mass number; b. chemical and/or physical form; and c. maximum amount which will be possessed at any one time.

6. PURPOSE(S) FOR WHICH LICENSED MATERIAL WILL BE USED.

7. INDIVIDUAL(S) RESPONSIBLE FOR RADIATION SAFETY PROGRAM AND THEIR TRAINING AND EXPERIENCE.

8. TRAINING FOR INDIVIDUALS WORKING IN OR FREQUENTING RESTRICTED AREAS.

9. FACILITIES AND EQUIPMENT.

10. RADIATION SAFETY PROGRAM.

11. WASTE MANAGEMENT.

12. LICENSE FEES (Fees required only for new applications, with few exceptions*)
(See 10 CFR 170 and Section 170.31)
***Amendments/Renewals that increase the scope of the existing license to a new or higher fee category will require a fee.**

FEE CATEGORY: Amendment | AMOUNT ENCLOSED $: 0.00

PER THE DEBT COLLECTION IMPROVEMENT ACT OF 1996 (PUBLIC LAW 104-134), YOU ARE REQUIRED TO PROVIDE YOUR TAXPAYER IDENTIFICATION NUMBER. PROVIDE THIS INFORMATION BY COMPLETING NRC FORM 531: https://www.nrc.gov/reading-rm/doc-collections/forms/nrc531info.html. FAX THE COMPLETED NRC FORM 531 TO (301) 415-6725.

13. CERTIFICATION. *(Must be completed by applicant) THE APPLICANT UNDERSTANDS THAT ALL STATEMENTS AND REPRESENTATIONS MADE IN THIS APPLICATION ARE BINDING UPON THE APPLICANT.*

THE APPLICANT AND ANY OFFICIAL EXECUTING THIS CERTIFICATION ON BEHALF OF THE APPLICANT, NAMED IN ITEM 2, CERTIFY THAT THIS APPLICATION IS PREPARED IN CONFORMITY WITH TITLE 10, CODE OF FEDERAL REGULATIONS, PARTS 30, 32, 33, 34, 35, 36, 37, 39, AND 40, AND THAT ALL INFORMATION CONTAINED HEREIN IS TRUE AND CORRECT TO THE BEST OF THEIR KNOWLEDGE AND BELIEF.
WARNING: 18 U.S.C. SECTION 1001 ACT OF JUNE 25, 1948 62 STAT. 749 MAKES IT A CRIMINAL OFFENSE TO MAKE A WILLFULLY FALSE STATEMENT OR REPRESENTATION TO ANY DEPARTMENT OR AGENCY OF THE UNITED STATES AS TO ANY MATTER WITHIN ITS JURISDICTION.

CERTIFYING OFFICER -- TYPED/PRINTED NAME AND TITLE	SIGNATURE	DATE
Michael Malski - RSO		

FOR NRC USE ONLY

TYPE OF FEE	FEE LOG	FEE CATEGORY	$ AMOUNT RECEIVED	CHECK NUMBER	COMMENTS
APPROVED BY				DATE	

5. Radioactive material

a. Element and mass number

> Sealed Source: Americium-241

b. Chemical and/or physical form

> Custom sealed source (foil source, QSA Global GmbH Braunschweig, Germany, Model AMMV577). The Am-241 is incorporated in the form of a relatively insoluble compound in a gold matrix. Which is covered on the alpha emitting face of the gold palladium alloy. The rear side is silver with a thin gold interface.

c. Maximum amount which will be possessed at any one time.

> Activity: 3.5 µCi (130 kBq) ±5%
> Type: Disc AMMV577
> Sealing: The disc is mounted in a metal holder and the edges are completely sealed.
> Maximum possession limit=17.5µCi, 5 units @ 3.5µCi each.

6. Purpose(s) for which licensed material will be used.

> The radioactive material is used in a measuring ionization chamber (MIC) that will measure smoke particle size while testing Gentex smoke detectors.

7. Individual(s) responsible for radiation safety program and their training and experience.

Radiation Safety Officer (RSO) Training and Experience Application (NUREG-1556 Vol. 7 Rev. 1)

Michael Malski, Laboratory Group Leader II, Gentex Corporation
380 Riley St.
Gentex Corporation
Zeeland, MI 49464
Michael.Malski@gentex.com
(616) 931-3503

Laboratory Group Leader II 01/30/2022 – Present
Laboratory Validation Engineer III, 11/30/2015 – 01/30/2022
Product Development Technician, 12/04/2008 – 11/30/2015
Ferris State University, BS EET, 2008

Training

- Radiation Protection Principles (8hrs, 2/6/2018)
- Radiation Safety Officer Course Online satisfying 10CFR33.15 (45hrs, 10/5/2020)
  Thomas Edison State University, Trenton, NJ
  - safe handling of radioactive materials
  - characteristics of ionizing radiation
  - *units of radiation dose and quantities*
  - *radiation detection instrumentation*
  - *biological hazards of exposure to radiation appropriate to the type and forms of byproduct material to be used*

Related Experience

- working with MIC type EC-912 smoke measuring devices which contain Americium-241 (2019)

Authorized User Training and Experience Application (NUREG-1556 Vol. 7 Rev. 1)

Benjamin McKenzie, Laboratory Validation Engineer II, Gentex Corporation
380 Riley St.
Gentex Corporation
Zeeland, MI 49464
ben.mckenzie@gentex.com
(616) 931-3553

Laboratory Validation Engineer II August 21, 2022 – Present
Process Engineering Technician September 12, 2021 – August 21, 2022
Production Team Member February 15, 2021 – September 12, 2021
Michigan Technological University, BS ChE, December 2020

Training

- Went through the Safety Training for the Smoke room at Gentex. (04/04/2023)
- Has used the MICs for testing with supervision from Richard Savola (RSO) (12/01/2022 – Present)
  - For UL fire testing to help the designers/engineers collect the needed data.
- Has gone over T030-xx9 MIC Source Cleaning Procedures (12/01/2022)
  - Help with maintenance of equipment needed for the MICs (pumps, filters, etc.)
- Online Unit Radiation Safety Officer Training (02/02/2022)
- Michigan Tech CM4310 Chemical Process Safety/ Environment (Fall 2019)
- Additional Duty Safety Officer Corse (03/14/2022-03/15/2022)

Related Experience

- Unit Radiation Safety Officer, 1-119 Forward Support Company 10/01/2021 – Present
  - Maintaining required records and documentation of radiation safety program
  - Meeting Michigan National Guard and National Guard Bureau requirements for safe handling and storage of radioactive materials
  - Facilitating the annual inspection of the armory for Michigan National Guard Radiation Safety Officer
- Unit Safety Officer, 1-119 Forward Support Company 10/01/2021-Present

8. Training for individuals working in or frequenting restricted areas.

Not applicable because there is no exposure to individuals greater than 1 mSv (100 mrem)

9. Facilities and Equipment

MIC locations for the 380 Riley smoke room are as follows. One is in the center of the room mounted to the ceiling, and the other two are mounted on the North and South walls. The MICs will be used for testing Gentex smoke detectors during “smolder” type fires. They are covered with protective metal housing during other tests to keep solvent type fires from making them dirty. These protective housings will only be removed by authorized users. Due to the location and the fact that it is a sealed source, there is no threat from radioactivity.

The doors into the 380 Riley smoke room are secured by card access and limited to less than 6 people.

10. Radia Safety Program

10.2 Radiation Monitoring Instruments:

Inspector Alert Nuclear Radiation Monitor

We will use instruments that meet the radiation monitoring instrument specifications published in Appendix M to NUREG – 1556, Vol. 7, 'Program-Specific Guidance About Academic, Research and Development, and Other Laboratory Licenses of Limited Scope'.

We reserve the right to upgrade our survey instruments as necessary.

10.3 Material Receipt and Accountability

We will develop, implement, and maintain procedures for always ensuring accountability of licensed material.

Physical inventories will be conducted at intervals not to exceed 6 months, to account for all sealed sources and devices received and possessed under the license. Records of inventory will be maintained for a period of 5 years from the date of each inventory, and will include the radio nuclides, quantities, manufacture's name and model numbers, and the date of the inventory.

10.4 Occupational Dose

We will maintain, for inspection by NRC, documentation demonstrating that unmonitored individuals are not likely to receive radiation in excess of the limits in 10 CFR 20.1502.

Under normal use, there will be no exposure to radiation from this sealed source, including no public dose. There should not be exposure to the authorized user when he needs to clean the radioactive source per the manufacturer's instructions. This procedure keeps the gloved hands several centimeters from the source. This dose will be determined when the cleaning task becomes necessary by the use of a TLD ring. We will monitor individuals in accordance with the criteria in the section entitled "Radiation Safety Program – Occupational Dose" in NUREG – 1556, Vl. 7, Consolidated Guidance about Materials Licenses: Program-Specific Guidance about Academic, Research and Development and Other Licenses of Limited Scope. See attachment regarding the Cleaning MIC Detectors procedures for more details.

10.6 Safe Use of Radionuclides and Emergency Procedures

Procedures for the safe use and security of materials and emergencies have been developed. An emergency response plan is not required based on the quantity of radioactive material (<2 curies)

We are exempt from posting requirements because the area of use does not meet the definition of a Radiation Area.

Radiation area means an area, accessible to individuals, in which radiation levels could result in an individual receiving a dose equivalent in excess of 0.005 rem (0.05 mSv) in 1 hour at 30 centimeters from the radiation source or from any surface that the radiation penetrates.

10.7 Survey

Leak tests are not required for this sealed source because the activity is less than 370kBq (10µCi).

11 Waste Management

Under normal conditions of use and maintenance, there will be no radioactive waste generated from the sealed source. In the event radioactive waste is generated (e.g. disposal of sealed source) waste removal, transportation, and disposal will only be performed by firms licensed to perform such services. The RSO will coordinate such activities.

More detailed information about this equipment can be found in the Instruction Manual and MIC Safety and Disposal Declaration (see attached).

GENTEX
CORPORATION

August 19, 2025

RE: Delegation of Authority to Radiation Safety Officer

Dear Michael Malski:

You have been appointed Radiation Safety Officer and are responsible for ensuring the safe and secure 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 necessary authority 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 fail to cooperate or do 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 two (2) hours per week conducting radiation protection activities.

Scott Ryan — August 21, 2025

Signature of Management Representative — Date
Scott Ryan, Vice President

I accept the above responsibilities,

Michael J Malski — 8/21/25

Signature of Radiation Safety Officer — Date
Michael Malski, Laboratory Group Leader

From: Malski, Mike
To: Tammy Tomczak
Subject: [External_Sender] RE: Completed NRC Form 313, Application for Materials License
Date: Thursday, August 28, 2025 5:32:04 AM
Attachments: 2025-08-27_License Amendment Request.pdf

Good morning, Tammy,

See attachment for updated cover letter. Sorry for the oversight. Thank you.

MJM

MICHAEL MALSKI
Laboratory Group Leader II
michael.malski@gentex.com
Direct: 616-931-3503
Cell: 616-450-5766

GENTEX CORPORATION

From: Tammy Tomczak <Tammy.Tomczak@nrc.gov>
Sent: Wednesday, August 27, 2025 8:19 AM
To: Malski, Mike <michael.malski@gentex.com>
Subject: RE: Completed NRC Form 313, Application for Materials License

Good morning, Michael,

The cover letter provided with your request was not signed or dated.

Can you please email me a signed/dated copy?

Thank you!
Tammy

From: Malski, Mike <michael.malski@gentex.com>
Sent: Wednesday, August 27, 2025 5:30 AM
To: R3-DRSSMail Resource <R3-DRSSMail.Resource@nrc.gov>
Subject: [External_Sender] Completed NRC Form 313, Application for Materials License

MICHAEL MALSKI

Laboratory Group Leader II

MJM

michael.malski@gentex.com

Direct: 616-931-3503

Cell: 616-450-5766

GENTEX CORPORATION

Martha Pavon

From: Tammy Tomczak
Sent: Wednesday, August 27, 2025 7:02 AM
To: Martha Pavon
Cc: Sandy Pavon
Subject: FW: Completed NRC Form 313, Application for Materials License
Attachments: 2025-08-19_Delegartion of Authority.pdf; Amendment Cover Letter 21-32837-01.docx; ML13083A072.pdf; Questions 5-11 Year2025.docx

Good morning, Martha 😊

Can you please add the attached to ADAMS?

Thank you!!
Tammy

From: Malski, Mike <michael.malski@gentex.com>
Sent: Wednesday, August 27, 2025 5:30 AM
To: R3-DRSSMail Resource <R3-DRSSMail.Resource@nrc.gov>
Subject: [External_Sender] Completed NRC Form 313, Application for Materials License

MICHAEL MALSKI

MJM

Laboratory Group Leader II

michael.malski@gentex.com

Direct: 616-931-3503

Cell: 616-450-5766

GENTEX CORPORATION