



**CERTIFICATE OF DISPOSITION
OF MATERIALS**

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Licensee Name and Address

BENCHMARK ENGINEERING, INC.
607 E. LAKE ST.
HARBOR SPRINGS, MI 49740

License Number

21-20496-01

Expiration Date

09/30/2025

Docket Number

3018446

A. LICENSE STATUS (Check the appropriate box)

☐ This license has expired.

☒ This license has not yet expired; please terminate it.

B. DISPOSAL OF RADIOACTIVE MATERIAL

(Check the appropriate boxes and complete as necessary. If additional space is needed, provide attachments)

The licensee, or any individual executing this certificate on behalf of the licensee, certifies that:

☐ 1. No radioactive materials have ever been procured or possessed by the licensee.

☒ 2. All activities authorized by this license have ceased, and all radioactive materials procured and/or possessed by the licensee under this license number cited above have been disposed of in the following manner.

☒ a. Transfer of radioactive materials to the licensee listed below:

PERFORMANCE ENGINEERS, INC. LICENCE NO.: 21-35258-01

☐ b. Disposal of radioactive materials:

☐ 1. Directly by the licensee:

☐ 2. By licensed disposal site:

☐ 3. By waste contractor:

☐ c. All radioactive materials have been removed, any remaining residual radioactivity is within the limits of 10 CFR Part 20, Subpart E, and is ALARA.

☐ d. Acknowledgment of receipt of the material by transfer or by disposal site is attached:

C. SURVEYS PERFORMED AND REPORTED

☐ 1. A radiation survey was conducted by the licensee. The survey confirms:

☐ a. the absence of licensed radioactive materials

☐ b. that any remaining residual radioactivity is within the limits of 10 CFR 20, Subpart E, and is ALARA.

☐ 2. A copy of the radiation survey results:

☐ a. is attached; or ☐ b. is not attached (Provide explanation); or

☐ c. was forwarded to the NRC

Email Address: _____ on: Date: _____

☒ 3. A radiation survey is not required as only sealed sources were ever possessed under this license, and

☒ a. The results of the latest leak test are attached; and/or ☒ b. No leaking sources have ever been identified.

The person to be contacted regarding the information provided on this form:

Name	Title	Telephone Number (Include area code)	Email Address
AARON NORDMAN	PRESIDENT	(231)547-2121	anordman@performanceeng.

Mail all future correspondence regarding this license to:

PERFORMANCE ENGINEERS, INC. 06972 US-31 S. CHARLEVOIX, MI 49720

C. CERTIFYING OFFICIAL

I CERTIFY UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT

Printed Name and Title

AARON NORDMAN, PRESIDENT

Signature of Certifying Official

Date

9/17/25

CERTIFICATE OF DISPOSITION OF MATERIALS

PLEASE READ THESE INSTRUCTIONS BEFORE COMPLETING NRC FORM 314.

Subpart E of 10 CFR Part 20 establishes the radiological criteria for license terminations/decommissioning of facilities licensed under 10 CFR Parts 30, 40, 50, 60, 61, 70, and 72, as well as other facilities subject to the Commission's jurisdiction under the Atomic Energy Act of 1954, as amended, and the Energy Reorganization Act of 1974, as amended.

INSTRUCTIONS

Section B, Item 2.

Licensees should describe the specific radioactive material transfer actions. If radioactive wastes were generated in terminating this license, the licensee should describe the disposal actions taken, including the disposition of low-level radioactive waste, mixed waste, greater-than-Class-C waste, and sealed sources.

Section B, Item 2.a.

The information provided concerning the transfer of radioactive material to another licensee should specify the date of the transfer, the name of the licensee recipient, an individual contact name and telephone number for the licensee recipient, and the recipient's NRC or Agreement State license number.

Section B, Item 2.b.

For disposal of radioactive materials, licensees should describe the specific disposal method or procedure (e.g., decay-in-storage). For those cases when radioactive materials are disposed of by a licensed disposal site or by a waste contractor, the licensee should specify the name, address, and telephone number of the licensed disposal site operator or waste contractor.

Section B, Item 2.c.

"Residual radioactivity," as defined in 10 CFR 20.1003, means radioactivity in 'areas' (structures, materials, soils, etc.) remaining as a result of activities (licensed and unlicensed) under the licensee's control from sources used by the licensee, excluding background radiation. ALARA is defined in 10 CFR 20.1003.

Section B, Item 2.d.

For transfer of radioactive materials licensees should attach a record of receipt from the recipient that contains information regarding what was received (e.g., radioactive materials for disposal or transfer.)

FILE CERTIFICATES 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 CERTIFICATES 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 314 is email.

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 CERTIFICATES 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 314 is email.

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

MATERIALS LICENSING SECTION
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 314 is email.



InstroTek Inc.
1 Triangle Drive
P.O. Box 13944
Research Triangle Park, NC 27709
(919) 875-8371

Jeff Kowalski
Performance Engineers (Charlevoix)
406 Petoskey Ave
Charlevoix, MI 49720

Phone: 231-499-8747

LEAK TEST CERTIFICATE

InstroTek License #092-1073-1


This certifies that leak test analysis was conducted on the sample with the following information. The results shown below accurately represent the level of removable contamination.

Make: Troxler, Inc.
Model: 3430
Serial Number: 27466

Date Swabbed: 1/30/2025
Analysis Date: 2/10/2025

Source Type	Serial Number	Reading (uCi)
AmBe-241	47-23958	0
Cs-137	750-1250	0.000181

Note: 0.005 MicroCuries (185 Bq) or greater is considered a leaking source. The source(s) tested above may remain in use.

Reviewed by:  Print Date: 2/10/2025

Customer Signature: _____ Date: _____

CPN gauges are 50 mCi Am241:Be and 10 mCi Cs-137. Humboldt gauges are 40 mCi Am241:Be and 10 mCi Cs-137. InstroTek Gauge is 40 mCi Am241:Be and 10 mCi Cs-137. Troxler gauges all, except 4640, are 40 mCi Am241:Be and 8 mCi Cs-137. Troxler 4640 is 8 mCi Cs-137. Refer to the manual for other products.



InstroTek Inc.
1 Triangle Drive
P.O. Box 13944
Research Triangle Park, NC 27709
(919) 875-8371

Jeff Kowalski
Performance Engineers (Charlevoix)
406 Petoskey Ave
Charlevoix, MI 49720

Phone: 231-499-8747

LEAK TEST CERTIFICATE

InstroTek License #092-1073-1


This certifies that leak test analysis was conducted on the sample with the following information. The results shown below accurately represent the level of removable contamination.

Make: Troxler, Inc.
Model: 3430
Serial Number: 32433

Date Swabbed: 1/30/2025
Analysis Date: 2/10/2025

Source Type	Serial Number	Reading (uCi)
AmBe-241	47-28643	0
Cs-137	750-7739	0.000178

Note: 0.005 MicroCuries (185 Bq) or greater is considered a leaking source. The source(s) tested above may remain in use.

Reviewed by:  Print Date: 2/10/2025

Customer Signature: _____ Date: _____

CPN gauges are 50 mCi Am241:Be and 10 mCi Cs-137. Humboldt gauges are 40 mCi Am241:Be and 10 mCi Cs-137. InstroTek Gauge is 40 mCi Am241:Be and 10 mCi Cs-137. Troxler gauges all, except 4640, are 40 mCi Am241:Be and 8 mCi Cs-137. Troxler 4640 is 8 mCi Cs-137. Refer to the manual for other products.

Martha Pavon

From: Tammy Tomczak
Sent: Monday, September 22, 2025 7:20 AM
To: Martha Pavon
Subject: FW: RE: NRC License No. 21-35258-01
Attachments: NRC 314 Termination for Benchmark.pdf; NRC 313 Renewal PEI.pdf

Good morning, Martha 😊

Can you please add the attached to ADAMS as two separate documents?

Thank you!!
Tammy

From: Aaron Nordman <aaronn@performanceeng.com>
Sent: Thursday, September 18, 2025 2:30 PM
To: Erin Kennedy <Erin.Kennedy@nrc.gov>; Jeff Kowalski <jeffk@performanceeng.com>
Cc: Tammy Tomczak <Tammy.Tomczak@nrc.gov>; Patti Swiss <pswiss@performanceeng.com>
Subject: [External_Sender] RE: NRC License No. 21-35258-01

Hi Erin,

Thank you for the follow up on our renewal process and termination of the Benchmark Engineering license. Please find attached to this email the following:

1. Termination request for Benchmark Engineering license along with the leak test results for the Benchmark gauges.
2. Renewal request for Performance Engineers, Inc. license that includes the Benchmark office as another location on our license.

I appreciate your help with this and if I am missing any information, please let me know and I will get it over to you. I also assume that this electronic submittal is satisfactory, but if I need to mail originals, please let me know.
Thanks,
Aaron

Aaron Nordman, PE
Performance Engineers, Inc.
Please note our new address:

6972 US-31 S
Charlevoix, Michigan 49720
(231) 547-2121 ph. (231) 675-3473 cell
www.performanceeng.com

From: Erin Kennedy <Erin.Kennedy@nrc.gov>
Sent: Friday, September 12, 2025 11:18 AM
To: Jeff Kowalski <jeffk@performanceeng.com>; Aaron Nordman <aaronn@performanceeng.com>
Cc: Tammy Tomczak <Tammy.Tomczak@nrc.gov>
Subject: NRC License No. 21-35258-01

Good Morning Jeff and Aaron ,

I wanted to reach out to both of you this morning because we have some time-sensitive information that we need from you regarding your NRC license. Your license expires at the end of September, and officially you needed to provide the information to renew the license 30 days prior to that date. I know from our conversations over the last couple of weeks that it is not your intention to terminate your license, therefore **we will need you to apply for a renewal as soon as possible.**

In order to apply for renewal of your NRC materials license, we will need the following documentation:

- 1) Please provide a complete NRC form 313 (attached). Please be sure that the form has been dated and signed by a duly authorized representative (typically a senior manager or the Radiation Safety Officer who is named on the license).
- 2) For your convenience and the streamlined handling of portable gauge applications, you may use Appendix B, "Suggested Format for Providing Information Requested in Items 5 through 11 of NRC Form 313," to [NUREG 1556 Vol.1, Rev. 2](#) to provide supplemental information. **I have attached a fillable PDF copy of this checklist to this email. If you choose to use this checklist, please note that we will need the following information:**

For Items 5 and 6 provide:

- Each radionuclide and maximum activity of each source per gauge model, and confirmation that the activity per source and maximum activity per gauge will not exceed the maximum activity listed in the approved certificate of registration issued by the NRC or by an Agreement State.
- Manufacturer (or distributor) and model number for each type of gauge.
- Maximum number of gauges to be possessed and used under the license, by manufacturer and model number.
- Purpose for which the gauges will be used, such as "to measure physical properties of materials," and confirmation that all gauges will be used as listed in accordance with the applicable and approved certificate of registration issued by the NRC or by an Agreement State.

For Item 10.8 please note:

- There are two checkboxes in this section, one for Routine Cleaning and Operation and one for Nonroutine Maintenance. You will need to make a selection for each.
- 3) Please provide a facility diagram for each permanent storage facility authorized on the license. The diagram should be drawn to scale and include the use of adjacent areas (including above and below), and information relevant to public dose and security. Additional information regarding public dose and security is discussed in Sections 8.10.5, "Public Dose," and 8.10.6, "Operating, Emergency, and Security Procedures," to NUREG 1556, Vol. 1, Rev. 2.

It is my understanding from your last amendment request, that you purchased Benchmark Engineering, Inc., and wish to terminate their license and add their facility and gauges to your license. I will need an authorized representative (such as the RSO) of Benchmark to provide a signed and dated NRC form 314 (attached) requesting the termination along with a copy of the most recent leak test records for the gauges that are being transferred to Performance Engineering. You will also need to provide a signed and dated letter attesting that Performance Engineering is accepting the gauges and the date that they were transferred. Make sure that your letter lists the serial number of each gauge so that we can confirm that we have received the

appropriate leak test records. **Fees are assessed on October 1, 2025, so please provide the form 314 as soon as possible.**

Notes on NRC form 314:

You will need to make a selection for box A. **License Status**, Box B. **Disposal of Radioactive Materials**, and Box C. **Surveys Performed and Reported**. Typically gauge users are not required to perform surveys because only sealed sources were possessed under the license. If you do make a selection that surveys are not required (3), please confirm both of the boxes below: (a) the results of the leak tests are attached **and** (b) that you have never had leaking sources.

I know that I gave you a lot of information, so please do not hesitate to give me a call at 505-699-3675 if you have any questions.

Thank you,

Erin Kennedy

U.S. Nuclear Regulatory Commission, Region III
Health Physicist- Materials Licensing
Email: erin.kennedy@nrc.gov
Office: 630-829-9876

From: Jeff Kowalski <jeffk@performanceeng.com>
Sent: Thursday, August 28, 2025 9:59 AM
To: Erin Kennedy <Erin.Kennedy@nrc.gov>
Subject: [External_Sender] Re: RE: Acknowledgement - Amendment Request for License No. 21-35258-01

 [PEI Offices.pdf](#)

If you have any questions please call my cell 231-499-8747

Thank you so much!!

From: Erin Kennedy <Erin.Kennedy@nrc.gov>
Sent: Thursday, August 28, 2025 10:36 AM
To: Tammy Tomczak <Tammy.Tomczak@nrc.gov>; Jeff Kowalski <jeffk@performanceeng.com>
Subject: RE: RE: Acknowledgement - Amendment Request for License No. 21-35258-01

Hello Jeff,

Can you give me a call at 505-699-3675 as soon as you can. I need some additional information in order to complete your request by tomorrow.

Thank you,

Erin Kennedy

U.S. Nuclear Regulatory Commission, Region III

Health Physicist- Materials Licensing

Email: erin.kennedy@nrc.gov

Office: 630-829-9876

From: Tammy Tomczak <Tammy.Tomczak@nrc.gov>

Sent: Thursday, August 28, 2025 9:26 AM

To: Jeff Kowalski <jeffk@performanceeng.com>

Cc: Erin Kennedy <Erin.Kennedy@nrc.gov>

Subject: RE: RE: Acknowledgement - Amendment Request for License No. 21-35258-01

Good morning, Jeff,

Erin Kennedy is the technical reviewer working on your request.

I have included Erin on this email.

Thank you,

Tammy

From: Jeff Kowalski <jeffk@performanceeng.com>

Sent: Thursday, August 28, 2025 9:19 AM

To: Tammy Tomczak <Tammy.Tomczak@nrc.gov>

Subject: [External_Sender] RE: Acknowledgement - Amendment Request for License No. 21-35258-01

Hello, I have submitted a license amendment which included a change of address . I have received confirmation that NRC has received that requested amendment. We will be moving into the new location on Friday August 29. Can we be granted permission to store the gauges at the new address ahead of the official licence approval?

Thank you ,

Performance Engineers

Jeff Kowalski

From: Tammy Tomczak <Tammy.Tomczak@nrc.gov>

Sent: Wednesday, August 20, 2025 12:32 PM

To: Jeff Kowalski <jeffk@performanceeng.com>

Subject: Acknowledgement - Amendment Request for License No. 21-35258-01

Good afternoon, Jeff,

Attached is acknowledgement of your amendment request.

Future correspondence can be emailed to R3-DRSSMail.Resource@nrc.gov.

Please let me know if you have any questions, or require any additional information.

Thank you,

Tammy Tomczak

Licensing Assistant

630-829-9564

Links contained in this email have been replaced. If you click on a link in the email above, the link will be analyzed for known threats. If a known threat is found, you will not be able to proceed to the destination. If suspicious content is detected, you will see a warning.