



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

August 14, 2025

Matthew J. Guard,
Vice President – Health & Safety
GAI Consultants, Inc.
385 E. Waterfront Drive
Homestead, PA 15120

SUBJECT: GAI CONSULTANTS, INC, REQUEST FOR ADDITIONAL INFORMATION, MAIL CONTROL NO. 647451

Dear Matthew Guard:

This is in reference to your application dated May 27, 2025, requesting to renew NRC License No. 37-09180-01. In order to continue our review, we need the following additional information:

Refer to NUREG-1556, Volume 1, Revision 2, “Consolidated Guidance About Materials Licenses - Program-Specific Guidance About Portable Gauge Licenses” (NUREG-1556, Vol. 1, Rev. 2) for more information on the general guidance used for license applications.

1. NUREG-1556 Vol. 1, Rev. 2, Item 3; “Address(es) Where Licensed Material Will Be Used or Possessed,” states to provide the address(es) where the gauges will be stored when gauges are not in the field and specification of whether they intend to use the portable gauge at temporary jobsites.

Your application does not state where you are storing and using your gauges. Your license currently is approved to store gauges at 927 Barlow Drive, Charleston, West Virginia and for use at temporary jobsites.

Please confirm if you will continue to store gauges at 927 Barlow Drive, Charleston, West Virginia and use at temporary jobsites anywhere in the U.S. where the NRC maintains jurisdiction.

2. The current Licensee management point of contact on file is Kent Cockley, Vice President.

Please confirm the current point of contact information you would like the NRC to have on file.

3. Your current license is authorized for 20 gauges, 180 mCi total of Cs-137 and 880 mCi total of Am-241:Be using both the 3400 series and 3411 and 3411B model gauges.

Your application requested the usage of 2 gauges, 18 mCi of Cs-137 and 88 mCi of Am-241:Be from the 3400 series gauges. However, the 3411 and 3411-B are from a different series sealed source and device (SSND) registration.

Please clarify the following:

- a. Total amount of gauges that you would like to be authorized for on your NRC license.
 - b. Do you have or use any 3411 or 3411-B gauges in NRC jurisdiction and/or would you like to keep them on your license?
4. NUREG-1556 Vol. 1, Rev. 2, Item 8.9; "Facilities and Equipment," states to 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".

The facility diagram provided does not show above and below the storage location and does not address information relevant to public dose and security.

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."

5. NUREG-1556 Vol. 1, Rev. 2, Item 8.10.3; "Material Receipt and Accountability," states to provide and commit to the following information:
- 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.

Your application does not commit to developing, implementing and maintaining procedures for ensuring accountability of licensed materials at all times.

Confirm commitment to the statement: "We will develop, implement and maintain procedures for ensuring accountability of licensed materials at all times."

6. NUREG-1556 Vol. 1, Rev. 2, Item 8.10.8; "Maintenance," has criteria commitments for both routine maintenance and nonroutine maintenance or repair operations that require detaching the source or source rod from the gauge.

Your application only addresses routine maintenance of the gauges according to each manufacturer's written recommendations and instructions.

To address nonroutine maintenance or repair operations that require detaching the source or source rod from the gauge: Submit either of the following:

- the statement: “The gauge manufacturer, or other person licensed by the NRC or an Agreement State will perform nonroutine maintenance or repair operations that require detaching the source or source rod from the gauge.”

OR

- a request to perform this work “in-house,” using the information in Appendix F of this NUREG to support the request

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

R1DRSSMail.Resource@nrc.gov

Cc: John.Scott@nrc.gov

Reference – Sloan Scott

Mail Control No. 647451

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).

In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice and Procedure," a copy of this letter will be available electronically for public inspection in the NRC Public Document Room or from the NRC's document system (ADAMS). ADAMS is accessible from the NRC Web Site at: <http://www.nrc.gov/reading-rm/adams.html>. Please be aware that you may request that certain portions of your submittal to the NRC be withheld from public disclosure as proprietary information. To do this, you must execute an affidavit as specified in 10 CFR 2.390. You must list all portions that you wish to be held proprietary, along with your reasoning as to why that is appropriate. While it is allowable, please refrain from submitting proprietary information in support of a license unless necessary. Keep in mind that all NRC licenses are considered to be in the public domain, and therefore may be viewed by any member of the public who requests to see them.

If you have any questions regarding this request for additional information, please contact me at 610-337-5273 or via electronic mail at John.Scott@nrc.gov.

Thank you for your cooperation.

Sincerely,

Sloan Scott, Health Physicist
Commercial, Industrial, R&D
and Academic Branch
Division of Radiological Safety and Security
Region I

License No. 37-09180-01
Docket No. 030-06199
Mail Control No. 647451

SUBJECT: GAI CONSULTANTS, INC, REQUEST FOR ADDITIONAL INFORMATION, MAIL CONTROL NO. 647451 DATED AUGUST 14, 2025.

SUNSI Review Complete: Sloan Scott

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

OFFICE	RI:DRSS			
NAME	S. Scott			
DATE	08/14/2025			

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