

CERTIFICATE OF DISPOSITION  
OF MATERIALS

Estimated burden per response to comply with this mandatory collection request: 30 minutes. This submittal is used by NRC as part of the basis for its determination that the facility is released for unrestricted use. 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, (3150-0028), 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.

Licensee Name and Address  Benchmark Engineering Inc. 607 E. Lake Street Harbor Springs, MI 49740	License Number  21-20496-01	Expiration Date
	Docket Number  030-18446	

A. LICENSE STATUS (Check the appropriate box)	
<input type="checkbox"/> This license has expired.	<input checked="" type="checkbox"/> 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)	
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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. License 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	
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- 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 Allison Spierling	Title RSO	Telephone Number (Include area code) 231-526-2119	Email Address ASpierling@Performanceeng.com
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Mail all future correspondence regarding this license to:

Performance Engineers Inc.  
06972 US 31 S, Charlevoix, Mich. 49720

C. CERTIFYING OFFICIAL I CERTIFY UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT		
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Printed Name and Title Allison Spierling, RSO	Signature of Certifying Official 	Date 12-17-25
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WARNING: FALSE STATEMENTS IN THIS CERTIFICATE MAY BE SUBJECT TO CIVIL AND/OR CRIMINAL PENALTIES. NRC REGULATIONS REQUIRE THAT SUBMISSIONS TO THE NRC BE COMPLETE AND ACCURATE IN ALL MATERIAL RESPECT. 18 U.S.C. SECTION 1001 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.

**INSTROTEK® COMPANIES**



INSTROTEK • CPN • HMA • RAINHART

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

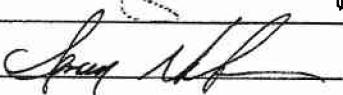
Date Swabbed: 1/30/2025

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: 2/10/25

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® COMPANIES**



INSTROTEK • CPN • HMA • RAINHART

InstroTek Inc.  
1 Triangle Drive  
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(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: Jeff Kowalski

Print Date: 2/10/2025

Customer Signature: Jeff Kowalski

Date: 2/10/25

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.

**From:** [Erin Kennedy](#)  
**To:** [Tammy Tomczak](#)  
**Subject:** FW: Re: NRC License No. 21-35258-01  
**Date:** Wednesday, December 17, 2025 1:58:33 PM  
**Attachments:** NRC Form 314 and Leak Tests\_20251217\_0001.pdf

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Hi Tammy,

Can you add this to Document to ADAMS and include the email chain as additional information for CN 650042

Thank you,

Erin Kennedy

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**From:** Patti Swiss <[pswiss@performanceeng.com](mailto:pswiss@performanceeng.com)>  
**Sent:** Wednesday, December 17, 2025 10:25 AM  
**To:** Aaron Nordman <[aaronn@performanceeng.com](mailto:aaronn@performanceeng.com)>  
**Cc:** Erin Kennedy <[Erin.Kennedy@nrc.gov](mailto:Erin.Kennedy@nrc.gov)>; Jeff Kowalski <[jeffk@performanceeng.com](mailto:jeffk@performanceeng.com)>  
**Subject:** [External\_Sender] Re: NRC License No. 21-35258-01

Hi Aaron,

Attached is NRC Form 314 filled out as requested. Also Attached is a copy of our most recent leak tests.

Allison Spierling, RSO signed the form on behalf of Benchmark Engineering Inc.

Please let me know if you have any questions,

Patti Swiss

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**From:** Aaron Nordman <[aaronn@performanceeng.com](mailto:aaronn@performanceeng.com)>  
**Sent:** Wednesday, December 17, 2025 9:11 AM  
**To:** Patti Swiss <[pswiss@performanceeng.com](mailto:pswiss@performanceeng.com)>  
**Cc:** Erin Kennedy <[Erin.Kennedy@nrc.gov](mailto:Erin.Kennedy@nrc.gov)>; Jeff Kowalski <[jeffk@performanceeng.com](mailto:jeffk@performanceeng.com)>  
**Subject:** FW: NRC License No. 21-35258-01

Hi Patti,

We are combining the nuclear gauge licenses for PEI/Benchmark and applied for this in our renewal. Can you please fill out and return this form with the most recent leak tests to Erin at the NRC? I

previously filled this out (attached), but need you to fill it out as Benchmark RSO.

We will prepare the letter for receipt of the gauges. If you have any questions, please call.

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](http://www.performanceeng.com)

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**From:** Erin Kennedy <[Erin.Kennedy@nrc.gov](mailto:Erin.Kennedy@nrc.gov)>  
**Sent:** Tuesday, December 9, 2025 3:53 PM  
**To:** Jeff Kowalski <[jeffk@performanceeng.com](mailto:jeffk@performanceeng.com)>; Aaron Nordman <[aaronn@performanceeng.com](mailto:aaronn@performanceeng.com)>  
**Cc:** Tammy Tomczak <[Tammy.Tomczak@nrc.gov](mailto:Tammy.Tomczak@nrc.gov)>  
**Subject:** RE: NRC License No. 21-35258-01

Good Afternoon Jeff and Aaron,

I wanted to touch base with you regarding the termination of your purchased license for Benchmark Engineering, Inc. which I discussed in our last email dated September 12 ( attached below). It is my understanding that you wish to terminate the Benchmark 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. This action is tied to several other requests by both you and Benchmark Engineering, Inc. and I cannot move forward on any of them until this issue is resolved, 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.

Please give me a call at 505-699-3675 if you have any questions about what you need to provide

Thank you,

*Erin Kennedy*

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

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**From:** Erin Kennedy  
**Sent:** Friday, September 12, 2025 10:18 AM  
**To:** Jeff Kowalski <[jeffk@performanceeng.com](mailto:jeffk@performanceeng.com)>; Aaron Nordman <[aaronn@performanceeng.com](mailto:aaronn@performanceeng.com)>  
**Cc:** Tammy Tomczak <[Tammy.Tomczak@nrc.gov](mailto: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](mailto:erin.kennedy@nrc.gov)  
 Office: 630-829-9876

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**From:** Jeff Kowalski <[jeffk@performanceeng.com](mailto:jeffk@performanceeng.com)>

**Sent:** Thursday, August 28, 2025 9:59 AM

**To:** Erin Kennedy <[Erin.Kennedy@nrc.gov](mailto: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!!

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**From:** Erin Kennedy <[Erin.Kennedy@nrc.gov](mailto:Erin.Kennedy@nrc.gov)>

**Sent:** Thursday, August 28, 2025 10:36 AM

**To:** Tammy Tomczak <[Tammy.Tomczak@nrc.gov](mailto:Tammy.Tomczak@nrc.gov)>; Jeff Kowalski <[jeffk@performanceeng.com](mailto: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](mailto:erin.kennedy@nrc.gov)

Office: 630-829-9876

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**From:** Tammy Tomczak <[Tammy.Tomczak@nrc.gov](mailto:Tammy.Tomczak@nrc.gov)>

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

**To:** Jeff Kowalski <[jeffk@performanceeng.com](mailto:jeffk@performanceeng.com)>

**Cc:** Erin Kennedy <[Erin.Kennedy@nrc.gov](mailto: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

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**From:** Jeff Kowalski <[jeffk@performanceeng.com](mailto:jeffk@performanceeng.com)>  
**Sent:** Thursday, August 28, 2025 9:19 AM  
**To:** Tammy Tomczak <[Tammy.Tomczak@nrc.gov](mailto: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

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**From:** Tammy Tomczak <[Tammy.Tomczak@nrc.gov](mailto:Tammy.Tomczak@nrc.gov)>  
**Sent:** Wednesday, August 20, 2025 12:32 PM  
**To:** Jeff Kowalski <[jeffk@performanceeng.com](mailto: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](mailto: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.