



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

May 29, 2026

Ms. Catherine Grainger
CASG Coal, LLC
113 East Main Street
Salem, VA 24153

SUBJECT: NUCLEAR REGULATORY COMMISSION GENERAL LICENSE DEVICE
REGISTRATION FOR GL-720325, BRC PINNACLE

Dear Ms. Grainger:

The U.S. Nuclear Regulatory Commission (NRC) understands that CASG Coal, LLC currently owns and operates the properties with Pinnacle Creek located at Pinnacle Creek Rd Rt 16, Pineville, West Virginia 24874.¹ From 2006-2009, Ronan Engineering transferred three registerable and four non-registerable general license (GL) devices to Pen Oak Resources which became Coval Engineering Fuels Plant No. 4 and then BRC Pinnacle Creek. Per [10 CFR 31.5\(c\)13j](#), annual registration of the three GL devices located at Pinnacle Creek as noted in the enclosure is due (see Enclosure 1).

Per 10 CFR 31.5, general licensees of byproduct material under NRC jurisdiction must: respond to NRC written requests; maintain a designated responsible individual; inform NRC within 30 days of disposal; and complete annual registration for certain generally licensed devices, as mentioned. Please ensure that you provide the following required information either through a completed registration form with corrections in the boxes under the pre-printed information or in a letter within 30 days sent to GLTS.Resource@nrc.gov: (1) confirmation of the current physical location of the devices; (2) name, title, and contact information of the responsible individuals; (3) updates to company/address information; and (4) confirmation that testing, service, leak-test records, and device labeling are available.

If the device is not in use for more than two years, note that 10 CFR 31.5(c)(15) restricts prolonged storage. Any transfer must comply with 10 CFR 31.5(c)(8)-(9), and abandonment of the device is prohibited under 10 CFR 31.5(c)(6). Testing and servicing must be performed by authorized individuals as required by 10 CFR 31.5(c)(3). Finally, loss or theft of the device must be reported to the NRC Operations Center per 10 CFR 20.2201. All the GL regulations are attached as an enclosure for your company's reference (See Enclosure 2).

¹ <https://apps.sos.wv.gov/business/corporations/organization.aspx?org=563377>

Please also refer to [Frequently Asked Questions About General Licenses | Nuclear Regulatory Commission](#), and contact me at Esther.Bryan@nrc.gov or (301)415-5011 with any additional questions. Thank you.

Sincerely,



Esther Bryan, Project Manager
Material Safety Licensing Branch
Division of Materials Safety, Security, State, and
Tribal Programs
Office of Nuclear Materials Safety and Safeguards

Docket No.: 720325

Enclosures:

1. Annual Registration of GL Devices with
Registration Form GL-720325-31
2. Regulations of GL Devices

cc: N. Aridi, OCFO/DOC/LAFBB/FBT



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

05/29/2026

TO: Users of Devices Subject to General License Registration

SUBJECT: ANNUAL REGISTRATION OF GENERALLY LICENSED DEVICES

The U.S. Nuclear Regulatory Commission (NRC) requires annual registration of certain devices that are possessed under the general license issued in Section 31.5 of Title 10 U.S. Code of Federal Regulations (10 CFR 31.5). Devices subject to registration include those containing the radioactive material and activity listed in Table 1 of the attached NRC Form 664. You are receiving this notice because NRC records indicate that you have one or more such devices. Information about the general license registration program is available at the following NRC website:

<https://www.nrc.gov/materials/miau/miau-reg-initiatives/gen-license.html>

Note that under 10 CFR 31.5(c)(11), the attached General Licensee Registration Package must be completed, signed, and returned to the NRC within 30 days from the date of this letter. Read all of the instructions prior to completing the package. Mail or preferably email to GLTS.Resource@nrc.gov, the completed package in the enclosed envelope to:

If Mailing - Not requiring a signature, use:

Director, Office of Nuclear Material Safety
and Safeguards
ATTN: Document Control Desk/GLTS
U.S. Nuclear Regulatory Commission
Washington DC 20555-0001

If Mailing - Requiring a tracking signature, use:

Director, NMSS
ATTN: GLTS
U.S. Nuclear Regulatory Commission
1555 Rockville Pike
Rockville, MD 20852-2738

Preferably email: GLTS.Resource@nrc.gov

Registration Fee: Commission regulations (10 CFR 170.31, Category 3Q) require that you submit a registration fee with each registration on an annual basis. The registration fee is subject to change yearly, and you are required to submit the fee that is in effect as of the date of this letter. An invoice for the current amount due will be sent to you under separate cover. If you have any questions about the fee or the invoice, please contact the License Fee Billing Help Desk at (301) 415-7554 or e-mail at fees.resource@nrc.gov.

NRC amended 10 CFR Parts 170.11 and 170.31 to provide that 10 CFR Part 170 fees be assessed to Federal agencies, where applicable, in accordance with the Energy Policy Act of 2005. Therefore, those Federal facilities required to register certain generally licensed devices in their possession will be required to pay the annual registration fee.

Attachment: NRC Form 664 -- General Licensee Registration and Instructions

Sincerely,

U.S. Nuclear Regulatory Commission
Office of Nuclear Material Safety
and Safeguards
Division of Materials Safety, Security, State,
and Tribal Programs
Materials Safety and Licensing Branch

**INSTRUCTIONS FOR COMPLETING NRC FORM 664
"GENERAL LICENSEE REGISTRATION"**

Review all six sections of this registration form. If any information is incorrect or missing, make corrections in the applicable boxes. If you have more devices than space provided in the form, **copy the form before starting, as needed**. Use black ink and print in **CAPITAL LETTERS**. Start information in the first box provided. If the information contains a number with a dash (-) or a decimal point (.), include the dash or decimal point as an individual character. Use the "ø" character to represent the number 0 (zero).

Verify information about the devices by reviewing the label on the outside of the device. **For safety reasons, DO NOT TRY TO TAKE APART any device to verify this information.** If you are uncertain how to identify the device's label, contact the device's manufacturer or an authorized service agent for this information. Also, contact the manufacturer for any additional information about NRC requirements. You may also review 10 CFR 31.5 and other applicable regulations on the NRC web site at <http://www.nrc.gov/reading-rm/doc-collections/cfr/>, or review specific information about the general licensee project at <https://www.nrc.gov/materials/miau/miau-req-initiatives/gen-license.html>

Note to specific licensees: If you believe the device(s) listed on the registration form are possessed under your specific license, then verify the device label does not state the device is subject to a general license. If the labels indicate the device is subject to a general license, then complete the registration form as instructed below. If not, complete the registration as instructed below, however, in Section 2, follow the instructions for "not in possession of device" and complete one Section 4 page per device transferred to your specific license.

Section 1 - General Licensee Information. Provide the requested information about you, the general licensee.

On Page 1, provide the street address/location where your device(s) are used. For portable devices, provide the storage location. P.O. Box addresses are not allowed.

On Page 2, provide the name, business telephone number, **business e-mail address** and title of the individual responsible for your device(s), and a mailing address where correspondence about your device(s) can be sent. The mailing address should be specific to the physical location where the devices are used and/or stored (P.O. boxes may be used if this is the only available mailing address). The individual indicated in this section as responsible for your device(s) must also verify and sign the form in Section 5.

Section 2 - Device Subject to Registration. This section lists each device subject to registration and in your possession, according to NRC records. Devices subject to registration include those containing at least one of the radionuclides listed in Table 1, with the activity indicated, at the time of manufacture.

Table 1. Criteria for Registration

Radionuclide	Activity greater than or equal to:
Strontium-90, Radium-226	3.7 megabecquerel (0.1 millicurie)
Cobalt-60, Curium-244, Americium-241, and Californium-252	37 megabecquerel (1 millicurie)
Cesium-137	370 megabecquerel (10 millicurie)

Use the codes from Table 2 when correcting isotope information for devices in this section. If you do not possess a device on this list, blacken the "not in possession of device" circle, and provide the relevant information in Section 4. Note that each device is assigned a unique six-digit number called the NRC Device Key.

Table 2. Isotope Codes for Sections 2 and 3

Radionuclide	Code for form	Radionuclide	Code for form
Americium-241	AM241	Curium-244	CM244
Californium-252	CF252	Strontium-90	SR90
Cesium-137	CS137	Radium-226	RA226
Cobalt-60	CO60		

Section 3 - Additional Devices. If you have other generally licensed devices (not listed in Section 2) that meet the conditions for registration listed in Table 1, provide information about each additional device. **Before starting, copy this section as needed for your additional devices.** Also indicate how you acquired each device by blackening the proper circle.

When entering isotope and unit information for your device(s), use the codes listed in Table 2 of Section 2 for isotope information, and use the codes from Table 3 for unit information:

Table 3. Unit Codes for Section 3

Unit	Code for form	Unit	Code for form
picocurie	PCI	becquerel	BQ
nanocurie	NCI	kilobecquerel	KBQ
microcurie	UCI	megabecquerel	MBQ
millicurie	MCI	gigabecquerel	GBQ
curie	CI	terabecquerel	TBQ
pound	LB	microgram	UG
		milligram	MG
kilogram	KG	gram	G

Section 4 - Not in Possession of Device. Use this section to report any devices that are listed in Sections 2 or 6, but that you no longer possess. **Before starting, copy this section as needed for additional devices that are not in your possession.** Enter the NRC Device Key, as listed in Section 2 or 6. Blacken the circle (choose only one) that best describes the disposition of the device and complete the rest of the section as appropriate.

Section 5 - Certification and Signature. The responsible individual must certify, sign, and date Section 5.

Section 6 - Devices Not Subject to Registration. This list contains information about devices that NRC records indicate are in your possession, but **are not subject to registration.** If you no longer have one or more of the listed devices, you are required to make a transfer report to NRC in accordance with 10 CFR 31.5 (c)(8) or (9), as applicable. You may use Section 4 for this purpose. This section does not list any static eliminators containing polonium-210 (Po-210), or luminous exit signs containing tritium (H-3). These devices are not subject to registration, and are not included in this section in an effort to reduce the length of this form.

RETURN THE COMPLETED FORM TO GLTS.Resource@nrc.gov OR IN THE ENCLOSED LARGE ENVELOPE WITH PROPER POSTAGE.

SECTION 2 - DEVICES SUBJECT TO REGISTRATION

Our records indicate that you have these devices. Please update the information as necessary.

NRC Device Key 750629 (Internal Control Number)

Distributor/Distributed By: Ronan Engineering Company

Grid for distributor name

Distributor License Number: IND-267-95G

Grid for distributor license number

Manufacturer name: RONAN ENGINEERING COMPANY

Grid for manufacturer name

Device Model (Not Source Model): SA1-C10

Grid for device model

Device Serial Number: 7664CM

Grid for device serial number

Transfer Date: 05/19/2006

Grid for transfer date

MM DD YYYY

Not in possession of device (Also complete Section 4.)

Table with 3 columns: Isotope (e.g. AM241), Activity (e.g. 1005), Unit (e.g. mCi). Rows 1-6 with data: 1 CS137 50 mCi

SECTION 2 - DEVICES SUBJECT TO REGISTRATION

Our records indicate that you have these devices. Please update the information as necessary.

NRC Device Key 793487 (Internal Control Number)

Distributor/Distributed By: Scan Technologies, Inc.

Empty grid for distributor information

Distributor License Number: GA1299-1

Empty grid for distributor license number

Manufacturer name: SCAN TECHNOLOGIES, INC.

Empty grid for manufacturer name

Device Model (Not Source Model): 2800

Empty grid for device model

Device Serial Number: 4506

Empty grid for device serial number

Transfer Date: 01/26/2009

Empty grid for transfer date

MM DD YYYY

Not in possession of device (Also complete Section 4.)

Table with 3 columns: Isotope (e.g. AM241), Activity (e.g. 1005), Unit (e.g. mCi). Rows 1-6 contain data for CS137 and AM241 isotopes.

SECTION 2 - DEVICES SUBJECT TO REGISTRATION

Our records indicate that you have these devices. Please update the information as necessary.

NRC Device Key 819836 (Internal Control Number)

Distributor/Distributed By: Ronan Engineering Company

Grid for distributor name

Distributor License Number: IND-267-95G

Grid for distributor license number

Manufacturer name: RONAN ENGINEERING COMPANY

Grid for manufacturer name

Device Model (Not Source Model): SA1-C10

Grid for device model

Device Serial Number: 5217-CM

Grid for device serial number

Transfer Date: 08/20/2008

Grid for transfer date

MM DD YYYY

Not in possession of device (Also complete Section 4.)

Table with 3 columns: Isotope (e.g. AM241), Activity (e.g. 1005), Unit (e.g. mCi). Rows 1-6.

SECTION 4 - NOT IN POSSESSION OF DEVICE

Provide information about devices listed in Section 2 or 6, but no longer in your possession.

Part 1

NRC Device Key: (from Section 2 or 6) [Grid]

Transfer Date: [Grid] MM [Grid] DD [Grid] YYYY

Location of the Device:

- Whereabouts Unknown (Complete Part 1 only)
Never Possessed the Device (Complete Part 1 only)
Returned to Manufacturer (Complete Part 1 only)
Transferred to another general licensee (Complete Parts 2 and 3)
Transferred to a Specific Licensee (Not the manufacturer) (Complete Part 2)

Part 2 License Number of Recipient (if transferred to a specific licensee):

[Grid]

Company Name:

[Grid]

Department:

[Grid]

Address Line 1:

[Grid]

Address Line 2:

[Grid]

City:

[Grid]

State: [Grid] Zip Code: [Grid] - [Grid]

Part 3 Enter the name of the individual responsible for this device:

Last name:

[Grid]

First name:

[Grid]

Middle Initial:

[Grid]

Business Telephone Number: [Grid]

Extension: [Grid]

Business Email Address:

[Grid]

Title:

[Grid]

SECTION 5 - CERTIFICATION

I hereby certify that:

- A. All information contained in this registration is true and complete to the best of my knowledge and belief.
- B. A physical inventory of the devices subject to registration has been completed, and the device information on this form has been checked against the device labeling.
- C. I am aware of the requirements of the general license, provided in 10 CFR 31.5.
(Copies of applicable regulations may be viewed at the NRC website at:
<http://www.nrc.gov/reading-rm/doc-collections/cfr>)

SIGNATURE - RESPONSIBLE INDIVIDUAL (Listed in Section 1) **DATE**

WARNING: FALSE STATEMENTS MAY BE SUBJECT TO CIVIL AND/OR CRIMINAL PENALTIES. NRC REGULATIONS REQUIRE THAT SUBMISSIONS TO THE NRC BE COMPLETE AND ACCURATE IN ALL MATERIAL ASPECTS. 18 U.S.C SECTION 1001 MAKES IT A CRIMINAL OFFENSE TO MAKE A WILLFULLY WRONG STATEMENT OR REPRESENTATION TO ANY DEPARTMENT OR AGENCY OF THE UNITED STATES AS TO ANY MATTER IN ITS JURISDICTION.

SECTION 6 - DEVICE NOT SUBJECT TO REGISTRATION

NRC Device Key: 778311 Manufacturer License No: IND-267-95G
Manufacturer Name: RONAN ENGINEERING COMPANY
Model Number: RLL1 Serial #: 208923A Transfer Date: 04/08/2008
Isotope: CS137 Activity: 0.9 Unit: mCi

NRC Device Key: 789346 Manufacturer License No: IND-267-95G
Manufacturer Name: RONAN ENGINEERING COMPANY
Model Number: X91 Serial #: SA-C10 Transfer Date: 10/22/2008
Isotope: CS137 Activity: 5 Unit: mCi

NRC Device Key: 789347 Manufacturer License No: IND-267-95G
Manufacturer Name: RONAN ENGINEERING COMPANY
Model Number: RLL1 Serial #: 209641A Transfer Date: 10/15/2008
Isotope: CS137 Activity: 0.9 Unit: mCi

NRC Device Key: 803177 Manufacturer License No: IND-267-95G
Manufacturer Name: RONAN ENGINEERING COMPANY
Model Number: SA1-C10 Serial #: 2983CN Transfer Date: 03/17/2006
Isotope: CS137 Activity: 5 Unit: mCi

Regulatory requirements for certain detecting, measuring, and controlling devices and certain devices for producing light or an ionized atmosphere generally licensed under 10 CFR 31.5

	Subject	Applicable Regulation
1	Report theft or loss of licensed material	10 CFR 20.2201
2	Notification of incidents	10 CFR 20.2202
3	Exempt concentrations	10 CFR 30.14(d)
4	Terms and conditions of licenses	10 CFR 30.34(a)-(e)
5	Bankruptcy notification	10 CFR 30.34(h)
6	Transfer of byproduct material	10 CFR 30.41
7	Reporting requirements	10 CFR 30.50
8	Records	10 CFR 30.51
9	Inspections	10 CFR 30.52
10	Tests	10 CFR 30.53
11	Modification and revocation of licenses and registration certificates	10 CFR 30.61
12	Right to cause the withholding or recall of byproduct material	10 CFR 30.62
13	Violations	10 CFR 30.63
14	Terms and conditions	10 CFR 31.2
15	Categories of users and types of devices	10 CFR 31.5 (a) and (b)(1)
16	Receipt of device	10 CFR 31.5(b)(2)
17	Labels on device	10 CFR 31.5(c)(1)
18	Testing	10 CFR 31.5(c)(2)
19	Testing and service	10 CFR 31.5(c)(3)
20	Records of testing	10 CFR 31.5(c)(4)
21	Malfunction of or damage to the device	10 CFR 31.5(c)(5)
22	Abandonment	10 CFR 31.5(c)(6)
23	Device export restrictions	10 CFR 31.5(c)(7)
24	Restrictions on and reporting of transfers of the device	10 CFR 31.5(c)(8)
25	Transfer of the device to a general licensee	10 CFR 31.5(c)(9)
26	Other applicable regulatory requirements	10 CFR 31.5(c)(10)
27	Respond to written requests from NRC	10 CFR 31.5(c)(11)
28	Appointment of a responsible person	10 CFR 31.5(c)(12)
29	Register appropriate devices	10 CFR 31.5(c)(13)(i)

Regulatory requirements for certain detecting, measuring, and controlling devices and certain devices for producing light or an ionized atmosphere generally licensed under 10 CFR 31.5

	Subject	Applicable Regulation
30	Annual registration of the device	10 CFR 31.5(c)(13)(ii) and 10 CFR 31.5(c)(13)(iii)
31	Report changes in mailing address	10 CFR 31.5(c)(14)
32	Do not hold devices not in use more than 2 years	10 CFR 31.5(c)(15)
33	No manufacture or import authorized	10 CFR 31.5(d)
34	Maintenance of records	10 CFR 31.21
35	Violations	10 CFR 31.22
36	Civil penalties	10 CFR 31.23

For more references of applicable regulations for each general license, please also refer to Appendix C of NUREG 1556 Volume 16 Revision 1 at:
<https://www.nrc.gov/reading-rm/doc-collections/nuregs/staff/sr1556/v16/index.html>