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

November 10, 2026

Trey Lawrence
Radiation Safety Officer
Olin Winchester, LLC
Lake City Army Ammunition Plant
25201 MO-78
Independence, MO 64051-1000

Dear Mr. Lawrence:

This letter is regarding your application dated August 31, 2026, for the renewal of your U.S. Nuclear Regulatory Commission (NRC) Materials License No. 24-24576-01.

The U.S. NRC's guidance document for your type of license, which I refer to below as "the guidance," is NUREG-1556, Volume 4, Rev. 1, dated July 2016, "Consolidated Guidance About Materials Licenses: Program-Specific Guidance About Fixed Gauge Licenses." This guidance is available on the U.S. NRC website at: https://www.nrc.gov/docs/ML1618/ML16188A048.pdf

Upon review of the request, I identified the following areas requiring additional or clarifying information:

1. Title 10 of the *Code of Federal Regulations* (10 CFR) §30.32(g)(1), and Section 8.5.1, "Sealed Sources and Devices," and Section 8.6, "Item 6: Purpose(s) for Which Licensed Material Will Be Used," of the guidance, specify that the license application identify the radionuclide and activity for each requested sealed source and/or device, the manufacturer's/distributor's name, model number, number of gauges for each model, and must provide information regarding the radioactive material requested and the intended purpose of use.

   Your application omits the device manufacturer's/distributor's name, model number and the intended purpose of use.

   Please resubmit your application providing all of the following information:

   - manufacturer's/distributor's name and model number for each requested fixed gauging device;
   - maximum activity per source and number of sealed sources per device;
   - total number of each type of fixed gauging device you are seeking authorization to possess and use; and
   - a description of the intended purpose of use of the fixed gauging devices.

2. 10 CFR §30.33(a), "General requirements for issuance of specific licenses," describes that an application for a specific license will be approved if:

   - the applicant's proposed equipment and facilities are adequate to protect health and minimize danger to life or property; and

   - the applicant is qualified by training and experience to use the requested radioactive material for the purpose requested in such a manner as to protect public health and minimize danger to life or property.

   Your license currently authorizes possession and use of custom use devices, in which users cannot rely or the intrinsic safety of the device. The continued use of these devices requires that you demonstrate that authorized users are qualified by training and experience and that you have adequate facilities and equipment for safely using and handling the sealed sources within these custom use devices in an unshielded form.

   Therefore, please resubmit your application including applicable revisions accounting for the continued use of custom use devices. This should include revisions to your authorized user qualification and training program and descriptions of your facilities and equipment.

3. Section 8.7.2, "Authorized Users," of the guidance, identifies that Authorized Users must have adequate training and experience in the use of fixed gauging devices.

   Your application, along with the accompanying e-mail dated September 1, 2026, identifies Jeremy Hudson, Kyle Baker, Owen McGraw and Trey Lawrence as Authorized Users.

   Submit applicable training and experience documentation to support the request to include yourself, Kyle Baker and Owen McGraw as Authorized Users. While Kyle Baker is currently identified as an Authorized User in Condition 11 of your license, it is unclear if you are seeking to add him as an Authorized User qualified to perform installation, initial radiation surveys, relocation, removal from service, alignment, replacement of sealed sources and non-routine maintenance or repair of components related to radiological safety as indicated in Condition 15.A.

   Lastly, please confirm that it is your intent to remove Dale Wilson as Authorized User.

4. Section 8.10.7, "Leak Tests," of the guidance, identifies that fixed gauge licensees may be authorized to collect and analyze leak test samples.

   Condition 13.E. of the license currently authorizes collection and in-house analysis of leak test samples. Though, your application for license renewal did not identify your intent to continue performing leak test analysis.

   Therefore, please clarify if you wish to continue to maintain authorization to perform in-house analysis of collected leak test samples. Refer to Appendix I, "Model Leak Test Program," of the guidance, for additional information and instruction.

5. Section 8.10.8, “Maintenance,” of the guidance, specifies that the application should include procedures and commitments related to the performance of routine maintenance and non-routine operations and maintenance.

   Your application does not include commitments or procedures relating to the performance of non-routine operations and maintenance.

   Therefore, please resubmit your application identifying if you wish to continue performing non-routine operations and maintenance as currently authorized in Condition 15 of your license. See Appendix J, “information Needed to Support Applicant’s Request to Perform Non-Routine Operations,” of the guidance, for additional information and instruction.

6. Section 8.13, “Item 13: Certification,” specifies that a representative of the legal entity filing the application must sign and date the NRC Form 313, “Application for Materials License.” The representative signing the application must be authorized to make binding commitments and to sign official documents on behalf of the applicant (i.e., a certifying official).

   You signed the submitted application for license renewal. Though, your title is not recognized as that of a certifying official (i.e., President, Director or EHS Manager).

   Therefore, please revise and submit the application bearing the signature of a certifying official. For additional information, you may refer to Chapter 3, “Management Responsibility,” of the guidance.

In accordance with 10 CFR §2.390 of the NRC’s “Rules of Practice,” a copy of this letter and its enclosure will be made available electronically for public inspection in the NRC Public Document Room or from the NRC's Agencywide Documents Access and Management System (ADAMS), accessible from the NRC website at https://www.nrc.gov/reading-rm/adams.html.

To continue review of your request, please submit your response to this letter within 30 calendar days from the date of this letter. In your response, please refer to the license, docket, and control number specified below. I will assume that you do not wish to further pursue this licensing action if I do not receive a reply within the specified timeframe noted above.

If you have questions, require additional time to respond, or require clarification on any of the information stated above, I encourage you to contact me at (630) 829-9737 or via e-mail at Jason.Kelly@nrc.gov.

Sincerely,

Digitally signed by JASON KELLY
Date: 2026.11.10 11:30:53 -06'00'
Adobe Acrobat version: 2026.002.21996

Jason M. Kelly, MPH, CPH
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Office of Nuclear Material Safety & Safeguards
Division of Federal Materials Programs
Inspection & Licensing Branch Central

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