

Appendix A

<b>NRC FORM 313</b> (7-88) 18 CFR 32, 33, 34 34, 35, 36, 38 and 40	<b>U. S. NUCLEAR REGULATORY COMMISSION</b>	APPROVED BY OMB: NO. 0125-0125 EXPIRES: N/A			
<b>APPLICATION FOR MATERIAL LICENSE</b>					
<b>INSTRUCTIONS: SEE THE APPROPRIATE LICENSE APPLICATION GUIDE FOR DETAILED INSTRUCTIONS FOR COMPLETING APPLICATION. SEND TWO COPIES OF THE ENTIRE COMPLETED APPLICATION TO THE NRC OFFICE SPECIFIED BELOW.</b>					
<b>APPLICATION FOR DISTRIBUTION OF EXEMPT PRODUCTS FILE APPLICATIONS WITH:</b> DIVISION OF INDUSTRIAL AND MEDICAL NUCLEAR SAFETY OFFICE OF NUCLEAR MATERIALS SAFETY AND SAFEGUARDS U.S. NUCLEAR REGULATORY COMMISSION WASHINGTON, DC 20545-0001  <b>ALL OTHER PERSONS FILE APPLICATIONS AS FOLLOWS:</b> <b>IF YOU ARE LOCATED IN:</b> CONNECTICUT, DELAWARE, DISTRICT OF COLUMBIA, MARY, MARYLAND, MASSACHUSETTS, NEW HAMPSHIRE, NEW JERSEY, NEW YORK, PENNSYLVANIA, RHODE ISLAND, OR VERMONT, SEND APPLICATIONS TO:  LICENSING ASSISTANT SECTION NUCLEAR MATERIALS SAFETY BRANCH U.S. NUCLEAR REGULATORY COMMISSION, REGION I 475 ALLENDALE ROAD KING OF PRUSSIA, PA 19406-1416  ALABAMA, FLORIDA, GEORGIA, KENTUCKY, MISSISSIPPI, NORTH CAROLINA, PUERTO RICO, SOUTH CAROLINA, TENNESSEE, VIRGINIA, VIRGIN ISLANDS, OR WEST VIRGINIA, SEND APPLICATIONS TO:  NUCLEAR MATERIALS LICENSING SECTION U.S. NUCLEAR REGULATORY COMMISSION, REGION II 191 MARQUETTE STREET, NW, SUITE 3000 ATLANTA, GA 30333-0100	<b>IF YOU ARE LOCATED IN:</b> ILLINOIS, INDIANA, IOWA, KANSAS, MINNESOTA, MISSOURI, OHIO, OR WISCONSIN, SEND APPLICATIONS TO:  MATERIALS LICENSING SECTION U.S. NUCLEAR REGULATORY COMMISSION, REGION III 801 WASHINGTON RD. LEBAN, IL 60455-4201  ALASKA, ARIZONA, ARKANSAS, CALIFORNIA, COLORADO, HAWAII, IDAHO, IOWA, KANSAS, LOUISIANA, MONTANA, NEBRASKA, NEVADA, NEW MEXICO, NORTH DAKOTA, OKLAHOMA, OREGON, PACIFIC TRUST TERRITORIES, SOUTH DAKOTA, TEXAS, UTAH, WASHINGTON, OR WYOMING, SEND APPLICATIONS TO:  NUCLEAR MATERIALS LICENSING SECTION U.S. NUCLEAR REGULATORY COMMISSION, REGION IV 911 RYAN PLAZA DRIVE, SUITE 400 ARLINGTON, TX 76011-5004				
<b>PERSONS LOCATED IN AGREEMENT STATES SEND APPLICATIONS TO THE U.S. NUCLEAR REGULATORY COMMISSION ONLY IF THEY WISH TO POSSESS AND USE LICENSED MATERIAL IN STATES SUBJECT TO U.S. NUCLEAR REGULATORY COMMISSION JURISDICTION.</b>					
<b>1. THIS IS AN APPLICATION FOR (Check appropriate item)</b> <input checked="" type="checkbox"/> A. NEW LICENSE <input type="checkbox"/> B. AMENDMENT TO LICENSE NUMBER _____ <input type="checkbox"/> C. RENEWAL OF LICENSE NUMBER _____	<b>2. NAME AND MAILING ADDRESS OF APPLICANT (include Zip code)</b> ARM Group, Inc. P.O. Box 40 Middletown, PA 17057				
<b>3. ADDRESS(ES) WHERE LICENSED MATERIAL WILL BE USED OR POSSESSED 29 S. Union St. Middletown, PA and at temporary job sites within the U.S. where USNRC maintains jurisdiction for regulating the use of licensed material. After February of 1999, the permanent storage address will be 561 W. Chocolate Ave.</b>					
<b>NAME OF PERSON TO BE CONTACTED ABOUT THIS APPLICATION</b> Michael J. Guy					
<b>TELEPHONE NUMBER (717) 948-5031</b> Hershey, PA.					
<b>SUBMIT ITEMS 5 THROUGH 11 ON 5-1/2 X 11" PAPER. THE TYPE AND SCOPE OF INFORMATION TO BE PROVIDED IS DESCRIBED IN THE LICENSE APPLICATION GUIDE.</b>					
<b>5. RADIOACTIVE MATERIAL</b> a. Isotopes and mass number; b. chemical and/or physical form; and c. maximum amount which will be processed at any one time	<b>6. PURPOSE(S) FOR WHICH LICENSED MATERIAL WILL BE USED.</b>				
<b>7. INDIVIDUAL(S) RESPONSIBLE FOR RADIATION SAFETY PROGRAM AND THEIR TRAINING EXPERIENCE.</b>	<b>8. TRAINING FOR INDIVIDUALS WORKING IN OR FREQUENTING RESTRICTED AREAS.</b>				
<b>9. FACILITIES AND EQUIPMENT.</b>	<b>10. RADIATION SAFETY PROGRAM.</b>				
<b>11. WASTE MANAGEMENT.</b>	<b>12. LICENSE FEE (See 18 CFR 170 and Section 170.31)</b> FEE CATEGORY <b>3P</b> AMOUNT <b>ENCLOSURE \$ 730.00</b>				
<b>13. CERTIFICATION (Must be completed by applicant) THE APPLICANT UNDERTAKES THAT ALL STATEMENTS AND REPRESENTATIONS MADE IN THIS APPLICATION ARE TRUE AND CORRECT TO THE BEST OF THEIR KNOWLEDGE AND BELIEF.</b>  THE APPLICANT AND ANY OFFICIAL EXECUTING THIS CERTIFICATION ON BEHALF OF THE APPLICANT, NAMED IN ITEM 2, CERTIFY THAT THIS APPLICATION IS PREPARED IN CONFORMANCE WITH TITLE 10, CODE OF FEDERAL REGULATIONS, PARTS 20, 32, 33, 34, 36, 39, 40 AND 45, AND THAT ALL INFORMATION CONTAINED HEREIN IS TRUE AND CORRECT TO THE BEST OF THEIR KNOWLEDGE AND BELIEF.  WARNING: 18 U.S.C. SECTION 1001 ACT OF JUNE 25, 1956 OR 18 U.S.C. 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.					
<b>CERTIFYING OFFICER - TYPE/PRINTED NAME AND TITLE</b> Michael Guy, EIT - Project Engineer					
<b>SIGNATURE</b> <i>[Signature]</i> <b>DATE</b> 12/23/98					
<b>FOR NRC USE ONLY</b>					
TYPE OF FEE	FEE LOG	FEE CATEGORY	AMOUNT RECEIVED	CHECK NUMBER	COMMENTS
APPROVED BY				DATE	

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PRINTED ON RECYCLED PAPER  
NUREG - 1556, Vol.1

126410

NMSS/RGNI MATERIALS-002

JAN - 5 1999

Item 5:

Radionuclei	Cesium-137
Form	Sealed source in compatible gauges as specified in Sealed Source and Device Registration Sheet
Maximum Amount	8 mci
Radionuclei	Americium-241:Be
Form	Sealed neutron source in compatible gauges as specified in Sealed Source and Device Registration Sheet
Maximum Amount	40 mci

Item 6:

For use in a Troxler Electronic Laboratories, Inc., Model 3430 moisture density gauge for measuring various properties of soil and other construction materials.

Item 7:

Mr. Michael Guy, E.I.T, Project Engineer is responsible for the ARM Group, Inc. Radiation Safety Program. Mr. Guy received certification for the use of nuclear testing equipment on September 22, 1992, by completing training courses instructed by Troxler Electronic Laboratories, Inc. He has operated moisture density gauges on a regular basis since the completion of his training. In addition, Mr. Guy has completed 40 hours of health and safety training as required by the Federal Occupational Health and Safety Administration of those involved in hazardous waste operations (OSHA 1910.120). This instruction included review of information concerning radioactive waste. Mr. Guy attends yearly eight-hour updates of this health and safety training course in compliance with OSHA 1910.120.

Item 8:

In addition to Mr. Guy, Mr. William Tafuto, P.E., Engineering Manager, and Mr. William Neidigh, Quality Assurance Inspector, have completed training courses and received certification for use of nuclear testing equipment. Mr. Tafuto's training, provided by CPN Corporation, was completed on March 3, 1989. Mr. Tafuto has served as the Radiation Safety Officer for R. E. Wright Associates, Inc. in Middletown, Pennsylvania for 9 years. Mr. Neidigh's training, provided by Troxler Electronic Laboratories, Inc., was completed June 4, 1996. Mr. Neidigh has operated moisture density gauges on a regular basis since the completion of his training. Both Mr. Tafuto and Mr. Neidigh have completed 40 hours of health

and safety training as required by the Federal Occupational Health and Safety Administration of those involved in hazardous waste operations (OSHA 1910.120). This instruction included review of information concerning radioactive waste. Mr. Tafuto and Mr. Neidigh attend yearly eight-hour updates of this health and safety training course in compliance with OSHA 1910.120.

Item 9:

Please refer to the attached sketches of the storage facilities at our current location (29 S. Union Street Middletown, Pennsylvania) and future location (561 W. Chocolate Avenue Hershey, Pennsylvania). The storage facilities will be lockable compartments and will be a minimum of 10 feet from the nearest permanent workstations. Appropriate radiation warning notices will be posted at the entrance to both facilities.

Item 10:

**RADIATION SAFETY PROGRAM**

**1. Radiation Safety Officer (RSO)**

A. Michael Guy will serve as the Radiation Safety Officer for ARM Group, Inc. As RSO he will:

1. Ensure that all terms and conditions of the license are being complied with and that the information contained in the license is up-to-date and accurate.
2. Ensure that the equipment has been leaked tested at the required intervals, but at a minimum of twice per year, and that the leak test is performed in the manner prescribed by Troxler Electronic Laboratories, Inc.
3. Ensure that the gauge is used only by individuals authorized by the RSO and that they use the gauge in accordance with all relevant regulations. This includes wearing of a suitable radiation film badge.
4. Maintain the records as required by the license and regulations. These records shall include personnel exposure, leak test records, and training certificates for all users.
5. Ensure that the equipment is properly secured against unauthorized removal at all times.
6. Serve as a point of contact and give assistance in case of an emergency such as equipment damaged in the field or by theft and to notify the proper authorities in case of an emergency.

7. Ensure that all users have read and understand the radiation safety operation and emergency procedures.
8. Ensure that all users have received training from Troxler Electronic Laboratories, Inc. or equivalent and arrange training for new users as required.
9. Post all required signs and notices in a prominent location

## 2. Operation Procedures

### A. Transportation of equipment

1. All possible means shall be provided to ensure that the equipment is fully secured in the transporting vehicle and the equipment is away from the passenger compartment. When transporting in an enclosed vehicle (car or van), the vehicle will be locked. When transporting in an open-bed vehicle, the gauge shall be securely fastened and locked to the truck bed.
2. The gauge will be transported in the case provided by the manufacturer. The U. S. Department of Transportation requires that the gauge be transported in a properly labeled case.
3. At all times while the gauge is being transported, the operator will carry the required shipping papers and a copy of the emergency plan.

### B. Operational Procedures

1. The operator shall exercise suitable control over the gauge at all times.
2. Under no circumstances will the gauge be left unattended or under the supervision of an unauthorized person.
3. When not being used for field measurement, the gauge shall have its source mechanism locked and will be locked in its transportation case. The gauge will also be returned to the vehicle.
4. When testing is completed, the gauge will be returned to its permanent place of storage, as soon as possible.
5. When using the gauge, operators shall wear a personal monitoring device, or dosimeter that has been assigned to them. When the operator is not using the equipment, the monitoring device shall be kept in a radiation free environment, as designated by the RSO. Arm will utilize Landauer for supply and testing of dosimeters (TLDs) which are replaced quarterly.

1 2 6 4 1 0

6. At all times, operators will observe the principle of ALARA.

By following the ALARA principle, operators will receive a radiation dose that is:

As Low As Reasonably Achievable

as required by the NRC.

C. Maintenance and Leak Test Procedures

1. Periodic maintenance will include cleaning of the gauge. The operator shall receive proper instruction on how to do this and will wear his film badge and observe ALARA while performing maintenance procedures.
2. No maintenance will be performed in which the radioactive source is removed from the gauge. For this type of maintenance, the gauge will be returned to the manufacturer.
3. The leak test will be performed using an approved leak test kit, supplied by Troxler Electronic Laboratories, Inc. twice per year. Leak tests will be performed in accordance with the manufacturer's instructions. The operator will wear their personal monitoring device while performing the leak test.
4. The shipping case will be inspected periodically to ensure all the required labels are visible.

3. Emergency Procedures

- A. In the event of physical damage to the gauge, the following will be performed:

1. Immediately cord off an area around the gauge. An area with a radius of fifteen (15) feet will be sufficient.
2. If a vehicle is involved, it must be stopped until the extent of contamination, if any, can be established.
3. A visual inspection of the gauge is to be made to determine if the source housing and/or shielding has been damaged.
4. At the earliest possible time, when the situation comes under control, the operator shall contact the RSO and describe the conditions. The operator shall follow the instructions of the RSO.

The RSO will contact the appropriate NRC office listed below:

Region I 24-hour telephone number (610) 337-5000

Region II 24-hour telephone number (404) 562-4400

Region III 24-hour telephone number (630) 829-9500

Region IV 24-hour telephone number (817) 860-8100

Troxler Electronic Laboratories, Inc will be contacted for advice at (919) 549-8661.

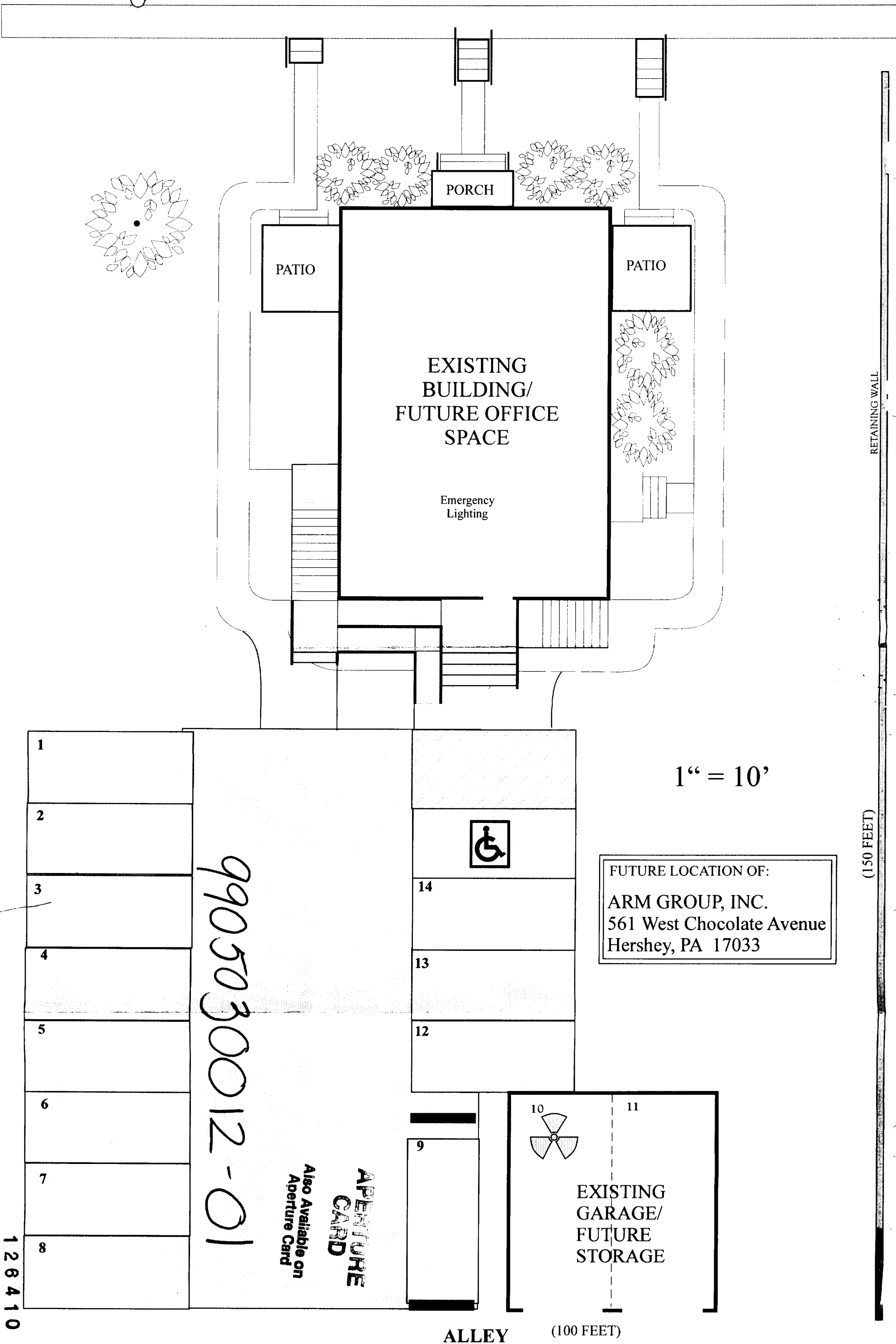
Other contacts will be established with the NRC or local authorities for response to a damaged gauge.

- B. In the event that the gauge is lost or stolen, immediately notify the RSO.

Item 11:

ARM understands that the disposal of the gauge is limited to transferring to another licensed user or return to the manufacturer.

WEST CHOCOLATE AVE.



Also Available on  
Aperture Card

APERTURE  
CARD

126410

ALLEY (100 FEET)

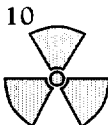
(150 FEET)

RETAINING WALL

1" = 10'

FUTURE LOCATION OF:  
ARM GROUP, INC.  
561 West Chocolate Avenue  
Hershey, PA 17033

EXISTING  
GARAGE/  
FUTURE  
STORAGE



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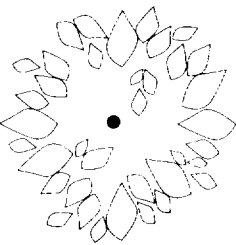
EXISTING  
BUILDING/  
FUTURE OFFICE  
SPACE

Emergency  
Lighting

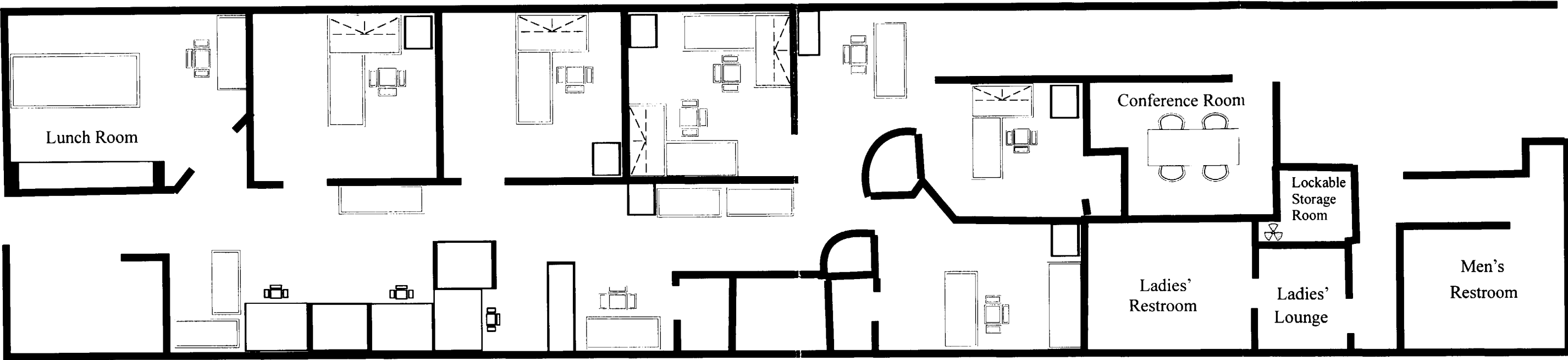
PATIO

PATIO

PORCH



ARM GROUP, INC  
29 South Union Street  
Middletown, PA 17057



FLOOR PLAN  
1" = 7' (approx)

APERTURE  
CARD

Also Available on  
Aperture Card

99050300/2-02

1 2 3 4 1 0



This is to acknowledge the receipt of your letter/application dated

12-23-98, and to inform you that the initial processing which includes an administrative review has been performed. 030 —

☒ <sup>New</sup> There were no administrative omissions. Your application was assigned to a technical reviewer. Please note that the technical review may identify additional omissions or require additional information.

☐ Please provide to this office within 30 days of your receipt of this card

A copy of your action has been forwarded to our License Fee & Accounts Receivable Branch, who will contact you separately if there is a fee issue involved.

Your action has been assigned Mail Control Number **126410**.

When calling to inquire about this action, please refer to this control number. You may call us on (610) 337-5398, or 337-5260.

Sincerely,  
Licensing Assistance Team Leader