



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION I
475 ALLENDALE ROAD
KING OF PRUSSIA, PENNSYLVANIA 19406-1415

July 24, 2007

Docket No. 03037436
Control No. 140303

License No. 19-31213-02

Terrance A. Gilliam
President
Concrete Imaging, Inc.
10005 Good Luck Road
Glenn Dale, MD 20769

SUBJECT: CONCRETE IMAGING, INC., REQUEST FOR ADDITIONAL INFORMATION
CONCERNING APPLICATION FOR A NEW LICENSE, CONTROL NO. 140303

Dear Mr. Gilliam:

This is in reference to your application dated March 27, 2007, requesting a Nuclear Regulatory Commission License No. 19-31213-02. We have identified the following items in your application that either need corrections or further explanation:

1. Your application dated March 27, 2007, makes a reference to your earlier application dated December 11, 2006. Please note that your application dated December 11, 2006, was voided, and we have only reviewed your application dated March 27, 2007. Please confirm that you understand that your application dated March 27, 2007, includes all of your radiation safety procedures.
2. Please be reminded that once approved, the radiation safety procedures included in your application become part of the license. Please confirm that you will request and receive amendment to your license prior to implementing any significant changes to these procedures.
- 3 Paragraph 3.2 (Occupational Dose Limits) of Section 2 of your Operating and Emergency Procedure Manual states that RSO shall review monthly Film Badge Reports or Bi-monthly TDL Reports, and investigate any employee that has a reported monthly dose greater than 400 mrem. A similar statement is also in Paragraph 4.3 regarding dose to a declared pregnant woman and minors. Please describe the criteria that the RSO will use to determine monthly dose to an employee or to a declared pregnant woman, when the TLD will be processed bimonthly.
4. Section 2, paragraph 4.2 of the Operating and Emergency Procedures Manual states that the maximum allowable dose rate for a declared pregnant woman is 0.5 rem per year. Please provide justification that a dose rate of 0.5 rem per year to a declared pregnant woman will meet the requirements in 10 CFR 20.1208, which requires that the dose equivalent to the embryo/fetus during the entire pregnancy remain under 0.5 rem and that the monthly exposure rate to the extent possible, be uniform. Alternatively, you may consider revising the statements in your procedures.

5. Section 3, paragraph 4.6.3 (2) of the Operating and Emergency Procedures Manual states that under the conditions described in that section notification would be made to the NRC Region I office. Please note that 10 CFR 20.1906(d) requires Notification to the NRC Operations Center (301-816-5100) and not to the NRC Regional Office. Please confirm that you will revise your notification procedures to include notification to NRC Operations Center.
6. Paragraph 2.2 of RSAP-003 state that the accuracy of survey instruments shall not exceed +/- 20 % of the actual known calibration intensity. This suggests that your surveys instruments will have an accuracy of only 20%. Please note that 10 CFR 34.25(b) requires that the survey instruments be calibrated so that an accuracy within plus or minus 20 percent of the calibration source can be demonstrated at each point checked. Please confirm that your survey instruments shall meet the requirements specified in 10 CFR 34.25.
7. Section 4.2 of RSAP-005 (Notification of Incidents) states that under the conditions described in the section, notification would be made to the NRC Region I office. Please note that 10 CFR 20.2202 requires that the notification of such incidents be made to the NRC Operations Center (301-816-5100). Please confirm that you will revise your procedures for notification to include notification to the NRC Operations Center.
8. We noticed that RSAP-005 includes an attachment entitled "Locations of NRC Offices and Agreement States". The information on this attachment is not current. You can obtain a current version at:
<http://nrc-stp.ornl.gov/asletters/other/sp07030.pdf>

Current NRC regulations and guidance are included on the NRC's website at www.nrc.gov; select **Site Map**; then scroll down to **Regulations, Guidance, and Communications**. You may also obtain these documents by contacting the Government Printing Office (GPO) toll-free at 1-888-293-6498. The GPO is open from 7:00 a.m. to 8:00 p.m. EST, Monday through Friday (except Federal holidays).

We will continue our review upon receipt of this information. Please reply to my attention at the Region I Office and refer to Mail Control No. 140303. If you have any technical questions regarding this deficiency letter, please call me at (610) 337-5364.

If we do not receive a reply from you within 20 calendar days from the date of this letter, we will assume that you do not wish to pursue your application.

Sincerely,

Original signed by Sattar Lodhi, Ph.D.

Sattar Lodhi, Ph.D.
Senior Health Physicist
Materials Security and Industrial Branch
Division of Nuclear Materials Safety

T. Gilliam
Concrete Imaging, Inc.

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cc:
Melvin V. Fravel, Radiation Safety Officer

T. Gilliam
Concrete Imaging, Inc.

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SUNSI Review Complete: Sattar Lodhi

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