



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION IV
612 EAST LAMAR BLVD, SUITE 400
ARLINGTON, TEXAS 76011-4125

August 12, 2011

Indo American Engineering, Inc.
ATTN: Dinesh P. Sheth, P.E.
Radiation Safety Officer
P.O. Box 1813
Rock Springs, Wyoming 82902-1813

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION

Dear Mr. Sheth:

The U.S. Nuclear Regulatory Commission (NRC) has completed the technical review of Indo American Engineering's renewal application and additional information is needed to complete the renewal process. Please provide the following information within 20 days of receipt of this letter. Make reference to mail control number 574969 when providing your response.

1. According to the renewal application, your current portable gauge inventory consists of one Troxler Model 3430 (serial number 32250), one Troxler 3440 (serial number 21693), and one Troxler 3440 (serial number 22986). Indicate how many gauges and what type of model number you want authorized in License No. 49-27701-01. You can request authorization for additional gauges based on future business needs.
2. Please note that 10 CFR 30.34, Terms and Conditions of Licenses, was revised to enhance the security requirements for portable gauges containing byproduct material. Revised 10 CFR 30.34 now requires that "each portable gauge licensee shall use a minimum of two independent physical controls that form tangible barriers to secure portable gauges from unauthorized removal, whenever portable gauges are not under the control and constant surveillance of the licensee" (i.e., when not in use). Guidance on these security procedures is provided in the errata sheet to Appendix H of NUREG-1556, Volume 1, revision 1 (see attachment). Commit to the following language:

"We will implement and maintain the "Operating, Emergency, and Security Procedures" described in the errata sheet to Appendix H of NUREG-1556, Volume 1, Revision 1, and provide copies of these procedures to all gauge users and at each job site."

3. There are contradicting statements in the renewal application regarding leak test frequency. One section of the application states that leak testing will be conducted at a 6 month frequency while another section states that leak testing will be performed at intervals specified in the sealed source and device registration certificates. Please note that leak test frequencies for portable gauges Troxler 3400 Series changed from a 6 month frequency to a 12 month frequency. Attached is the most recent copy of the sealed source and device registration certificate (NC-646-D-130-S) corresponding to Troxler 3400 Series. Indicate if your company is going to perform leak testing on a 6 month frequency or a 12 month frequency.

4. 10 CFR 71.5(a) requires that a licensee who transports licensed material outside of the site of usage, as specified in the NRC license, or where transport is on public highways, or who delivers licensed material to a carrier for transport, comply with the applicable requirements of the regulations appropriate to the mode of transport of the DOT in 49 CFR Parts 107, 171-180, and 390-397.

49 CFR 172.301(a) requires in part that each person who offers for transportation hazardous material in a non-bulk packaging shall mark the package with the proper shipping name and identification number (preceded by "UN") for the material shown in the 172.101 table. Pursuant to 49 CFR 172.101, radioactive material is classified as hazardous material.

The renewal application contains an inventory log and bill of lading showing the U.S. Department of Transportation UN2974 number for portable gauges. UN2974 is no longer a valid identification number. Please commit to the following language:

"Indo American Engineering will offer for transportation non-bulk packages that will be marked with the proper shipping name and identification number. The non-bulk packages (Type A shipping containers) will have labels identifying the material as UN3332, Radioactive Material, Type A package, Special Form 7, RQ. In addition, the inventory log, bill of lading and any other regulatory required documentation will indicate UN3332, Radioactive Material, Type A package, Special Form 7, RQ".

In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice," a copy of this letter will be available electronically for public inspection in the NRC Public Document Room or from the NRC's document system (ADAMS). ADAMS is accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html>.

Thank you for your cooperation.

Sincerely,

A handwritten signature in black ink, appearing to read "Roberto J. Torres", with a stylized flourish at the end.

Roberto J. Torres, Senior Health Physicist
Nuclear Materials Safety Branch B

Docket: 030-35704
License: 49-27701-01
Control: 574969

Torres, RobertoJ

From: Torres, RobertoJ
Sent: Friday, August 12, 2011 9:26 AM
To: 'contact@indoamengg.com'
Subject: Request for additional information letter
Attachments: Request for additional information letter.pdf; App H NUREG 1556 Vol 1-errata.pdf; Troxler 3400.pdf

Mr. Sheth:

Attached is letter requesting additional information in support of renewal of NRC License No. 49-27701-01. A hard copy of the letter has also been mailed out today to your attention.

Roberto J. Torres
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