

**From:** [jlirosa@jlipim.com](mailto:jlirosa@jlipim.com)  
**To:** [Lodhi.Sattar](mailto:Lodhi.Sattar)  
**Cc:** [Raul Santiago](mailto:Raul.Santiago); [Luis Rodriguez](mailto:Luis.Rodriguez)  
**Subject:** RE: NRC License Renewal  
**Date:** Tuesday, February 12, 2013 8:18:34 AM  
**Attachments:** [bottom.letterhead](#)  
[Scan - PIM Eng. Lab., Inc - Responses to Items 5 to 11, NRC](#)

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Dr. Lodhi,

Attached, please find the responses to items 5 to 11 of NRC Form 313. These were based on the tables and checklists included in Appendix B of NUREG 1556.

Cordially,

José L. Irizarry-Rosa, MECE, PE  
Partner  
PIM  
3009 San Cristóbal Avenue  
Coto Laurel, Puerto Rico 00780-2808  
Tel (787) 848-2075, Fax (787) 848-1562  
Email: [jlirosa@jlipim.com](mailto:jlirosa@jlipim.com)

----- Original Message -----

Subject: RE: NRC License Renewal  
From: "Lodhi, Sattar" <[Sattar.Lodhi@nrc.gov](mailto:Sattar.Lodhi@nrc.gov)>  
Date: Tue, February 12, 2013 8:42 am  
To: "[jlirosa@jlipim.com](mailto:jlirosa@jlipim.com)" <[jlirosa@jlipim.com](mailto:jlirosa@jlipim.com)>

I had read your accompanying letter and it did not include the required information. Please read and complete items 5 through 11 of Appendix B. You have not provided the information related to Radiation Safety Program (All you said was that "No information needs to be submitted in response to this item") . As I suggested in my e-mail, you can use the Appendix B and you do not have to type anything.

Feel free to call me if you have any questions.

Sattar Lodhi

**From:** [jlirosa@jlipim.com](mailto:jlirosa@jlipim.com) [<mailto:jlirosa@jlipim.com>]  
**Sent:** Tuesday, February 12, 2013 7:35 AM  
**To:** Lodhi, Sattar  
**Cc:** Ing. Luis Rodriguez; JLIPIIM Group, Inc. Laboratory  
**Subject:** RE: NRC License Renewal

Hello Dr. Lodhi,

Thanks for your Email. Just to confirm that we included the responses to Items 5 to 11 of the NRC Form 313, using a letter format that was attached to the form. The letter is included as an attachment in this Email.

Please let us know if additional information is required.

Cordially,

José L. Irizarry-Rosa, MECE, PE  
Partner  
PIM  
3009 San Cristóbal Avenue  
Coto Laurel, Puerto Rico 00780-2808  
Tel (787) 848-2075, Fax (787) 848-1562  
Email: [jlirosa@jlipim.com](mailto:jlirosa@jlipim.com)

----- Original Message -----

Subject: RE: NRC License Renewal  
From: "Lodhi, Sattar" <[Sattar.Lodhi@nrc.gov](mailto:Sattar.Lodhi@nrc.gov)>  
Date: Mon, February 11, 2013 9:06 am  
To: "JLIPIM Group, Inc. Laboratory"  
<[raulpimlab@gmail.com](mailto:raulpimlab@gmail.com)>, José Luis  
<[jlirosa@jlipim.com](mailto:jlirosa@jlipim.com)>, "Ing. Luis Rodriguez"  
<[lrodriguez@jlipim.com](mailto:lrodriguez@jlipim.com)>

Mr. Irizarry-Rosa:

I apologize for the delay in responding to your message. I was out of office last week.

We did receive your renewal application on February 1, 2013. However, it does not include all the required information. You should print out Appendix B of NUREG 1556, Vol 1, Rev., 1, which is available from the NRC website [www.nrc.gov](http://www.nrc.gov). You should fill the information (which is simply putting check marks in appropriate places, and attached NRC Form 313, signed and dated by Jose. Please feel free to call me at (610) 337 5364, if you need further assistance.

Sattar Lodhi  
NRC, Region I  
(610) 337 5364

**From:** JLIPIM Group, Inc. Laboratory [<mailto:raulpimlab@gmail.com>]  
**Sent:** Friday, February 08, 2013 2:57 PM  
**To:** Lodhi, Sattar; José Luis; Ing. Luis Rodriguez

**Subject:** NRC License Renewal

Good afternoon Dr., please find attached the requested documents for the license renewal in pdf,, as you can see in the attachment a person with name Laurie received already the documents in your office, please reply if you can do so with a date we can expect to received the new one, thanks and have a good weekend



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soil and construction material testing

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# ITEMS 5 AND 6: MATERIALS TO BE POSSESSED AND PROPOSED USES

Yes	No	Radioisotope	Manufacturer or Distributor Model No.	Quantity	Use As Listed on SSD Certificate	Specify Other Uses Not Listed on SSD Certificate
✓		Cesium-137	Sealed source manufacturer or distributor and model number: <u>CPN Int., Inc.</u> <u>Model CPN-131.</u>  Device manufacturer or distributor and model number: <u>CPN Int., Inc.</u> <u>Model MC Portaprobe</u>	Not to exceed either the maximum activity per source or maximum activity per device as specified in Sealed Source and Device Registration Certificate	Yes <input checked="" type="checkbox"/> Specific description of the gauge use: <u>Measuring Physical Properties of Materials.</u>	<input checked="" type="checkbox"/> Not applicable  <input type="checkbox"/> Uses are:  (Submit safety analysis supporting safe use)
✓		Americium-241	Sealed source manufacturer or distributor and model number: <u>CPN Int., Inc.</u> <u>Model CPN-131.</u>  Device manufacturer or distributor and model number: <u>CPN Int., Inc.</u> <u>Model MC Portaprobe</u>	Not to exceed either the maximum activity per source or maximum activity per device as specified in Sealed Source and Device Registration Certificate	Yes <input checked="" type="checkbox"/> Specific description of the gauge use: <u>Measuring Physical Properties of Materials.</u>	<input checked="" type="checkbox"/> Not applicable  <input type="checkbox"/> Uses are:  (Submit safety analysis supporting safe use)

APPENDIX B

Yes	No	Radioisotope	Manufacturer or Distributor Model No.	Quantity	Use As Listed on SSD Certificate	Specify Other Uses Not Listed on SSD Certificate
	✓	Californium-252	Sealed source manufacturer or distributor and model number: _____ Device manufacturer or distributor and model number: _____	Not to exceed either the maximum activity per source or maximum activity per device as specified in Sealed Source and Device Registration Certificate	Yes <input type="checkbox"/> Specific description of the gauge use: _____ _____ _____ _____ _____	<input type="checkbox"/> Not applicable _____ <input type="checkbox"/> Uses are: _____ (Submit safety analysis supporting safe use)
	✓	Other Isotope (Specify):	Sealed source manufacturer or distributor and model number: _____ Device manufacturer or distributor and model number: _____	Not to exceed either the maximum activity per source or maximum activity per device as specified in Sealed Source and Device Registration Certificate	Yes <input type="checkbox"/> Specific description of the gauge use: _____	<input type="checkbox"/> Not applicable _____ <input type="checkbox"/> Uses are: _____ (Submit safety analysis supporting safe use)
Financial Assurance Required and Evidence of Financial Assurance Provided						

# **ITEMS 7 THROUGH 11: TRAINING AND EXPERIENCE, FACILITIES AND EQUIPMENT, RADIATION SAFETY PROGRAM, AND WASTE DISPOSAL**

Item No. And Title	Suggested Response	Yes	Alternative Procedures Attached
<p>7. <b>INDIVIDUAL(S) RESPONSIBLE FOR RADIATION SAFETY PROGRAM AND THEIR TRAINING AND EXPERIENCE - RADIATION SAFETY OFFICER</b></p> <p>Name: <u>José L. Irizarry-Rosa</u></p>	Before obtaining licensed materials, the proposed RSO will have successfully completed one of the training courses described in Criteria in the section entitled "Individual(s) Responsible for Radiation Safety Program and Their Training and Experience - Radiation Safety Officer" in NUREG-1556, Vol. 1, Rev. 1, dated November 2001.	<input checked="" type="checkbox"/>	<input type="checkbox"/>
8. <b>TRAINING FOR INDIVIDUALS WORKING IN OR FREQUENTING RESTRICTED AREAS</b>	Before using licensed materials, authorized users will have successfully completed one of the training course described in Criteria in the section entitled "Training for Individuals Working In or Frequenting Restricted Areas" in NUREG-1556, Vol. 1, Rev 1, dated November 2001.	<input checked="" type="checkbox"/>	<input type="checkbox"/>
9. <b>FACILITIES AND EQUIPMENT</b>	No information needs to be submitted in response to this item; key issues are addressed under "Radiation Safety Program - Public Dose" and "Radiation Safety Program - Operating and Emergency Procedures."	<p>Separate Item 9 Response</p> <p>Need Not Be Submitted With Application</p>	
10. <b>RADIATION SAFETY PROGRAM - AUDIT PROGRAM</b>	The applicant is <i>not</i> required to, and should not, submit its audit program to NRC for review during the licensing phase.	Need Not Be Submitted With Application	
10. <b>RADIATION SAFETY PROGRAM - TERMINATION OF ACTIVITIES</b>	The applicant is <i>not</i> required to submit a response to the termination of activities section during the initial application. However, when the license expires when the licensee ceases operation, NRC Form 314 must be submitted.	Need Not Be Submitted With Application	
10. <b>RADIATION SAFETY PROGRAM - SURVEY INSTRUMENTS</b>	We will either possess and use, or have access to and use, a radiation survey meter that meets the Criteria in the section entitled "Radiation Safety Program - Instruments" in NUREG-1556, Vol. 1, Rev. 1, dated November 2001.	<input checked="" type="checkbox"/>	<input type="checkbox"/>

## APPENDIX B

Item No. And Title	Suggested Response	Yes	Alternative Procedures Attached
10. RADIATION SAFETY PROGRAM – MATERIAL RECEIPT AND ACCOUNTABILITY	Physical inventories will be conducted at intervals not to exceed 6 months, to account for all sealed sources and devices received and possessed under the license.	<input checked="" type="checkbox"/>	<input type="checkbox"/>
10. RADIATION SAFETY PROGRAM – OCCUPATIONAL DOSIMETRY	Either we will maintain, for inspection by NRC, documentation demonstrating that unmonitored individuals are not likely to receive a radiation dose in excess of 10 percent of the allowable limits in 10 CFR Part 20, or we will provide dosimetry processed and evaluated by an NVLAP-approved processor that is exchanged at a frequency recommended by the processor.	<input checked="" type="checkbox"/>	<input type="checkbox"/>
10. RADIATION SAFETY PROGRAM – PUBLIC DOSE	The applicant is <i>not</i> required to submit a response to the public dose section during the licensing phase. This matter will be examined during an inspection.	Need Not Be Submitted With Application	
10. RADIATION SAFETY PROGRAM – OPERATING AND EMERGENCY PROCEDURES	We will implement and maintain the operating and emergency procedures in Appendix H of NUREG-1556, Vol. 1, Rev. 1, dated November 2001, and provide copies of these procedures to all gauge users and at each job site.	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	OR  Operating and emergency procedures will be developed, implemented, and maintained and will meet the criteria in the section entitled "Radiation Safety Program – Operating and Emergency Procedures" in NUREG-1556, Vol. 1, Rev. 1, dated November 2001.	<input type="checkbox"/>	
10. RADIATION SAFETY PROGRAM – LEAK TEST	Leak tests will be performed at intervals approved by NRC or an Agreement State and specified in the Sealed Source and Device Registration Sheet. Leak tests will be performed by an organization authorized by NRC or an Agreement State to provide leak testing services for other licensees or using a leak test kit supplied by an organization authorized by NRC or an Agreement State to provide leak test kits to other licensees and according to the kit supplier's instructions.	<input checked="" type="checkbox"/>	<input type="checkbox"/>  The information in Appendix J supporting a request to perform leak testing and sample analysis is attached.

Item No. And Title	Suggested Response	Yes	Alternative Procedures Attached
10. RADIATION SAFETY PROGRAM – MAINTENANCE	<i>Routine Cleaning and Lubrication</i> We will implement and maintain procedures for routine maintenance of our gauges according to each manufacturer's recommendations and instructions.	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	<i>Non-Routine Maintenance</i> We will send the gauge to the manufacturer or other person authorized by NRC or an Agreement State to perform non-routine maintenance or repair operations that require the removal of the source or source rod from the gauge.	<input checked="" type="checkbox"/>	<input type="checkbox"/> The information listed in Appendix C supporting a request to perform non-routine maintenance in-house is attached.
10. RADIATION SAFETY PROGRAM – TRANSPORTATION	The applicant is <i>not</i> required to submit its response to transportation during the licensing process. However, this issue will be reviewed during inspection.	Need Not Be Submitted With Application	
11. WASTE MANAGEMENT – GAUGE DISPOSAL AND TRANSFER	The applicant is <i>not</i> required to submit a response to waste management during the licensing process. However, the licensee should develop, implement, and maintain gauge transfer and disposal procedures in its radiation protection program.	Need Not Be Submitted With Application	