

(03-2013)
10 CFR 30, 32, 33,
34, 35, 36, 39, and 40



APPLICATION FOR MATERIALS LICENSE

Estimated burden per response to comply with this mandatory collection request: 4.3 hours. Submittal of the application is necessary to determine that the applicant is qualified and that adequate procedures exist to protect the public health and safety. Send comments regarding burden estimate to the Information Services Branch (T-5 F53), U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001, or by internet e-mail to InfoCollects.Resource@nrc.gov, and to the Desk Officer, Office of Information and Regulatory Affairs, NEOB-10202, (3150-0120), Office of Management and Budget, Washington, DC 20503. If a means used to impose an information collection does not display a currently valid OMB control number, the NRC may not conduct or sponsor, and a person is not required to respond to, the information collection.

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. *AMENDMENTS/RENEWALS THAT INCREASE THE SCOPE OF THE EXISTING LICENSE TO A NEW OR HIGHER FEE CATEGORY WILL REQUIRE A FEE.

APPLICATION FOR DISTRIBUTION OF EXEMPT PRODUCTS FILE APPLICATIONS WITH:

OFFICE OF FEDERAL & STATE MATERIALS AND
ENVIRONMENTAL MANAGEMENT PROGRAMS
DIVISION OF MATERIALS SAFETY AND STATE AGREEMENTS
U.S. NUCLEAR REGULATORY COMMISSION
WASHINGTON, DC 20555-0001

ALL OTHER PERSONS FILE APPLICATIONS AS FOLLOWS:

IF YOU ARE LOCATED IN:

ALABAMA, CONNECTICUT, DELAWARE, DISTRICT OF COLUMBIA, FLORIDA, GEORGIA, KENTUCKY, MAINE, MARYLAND, MASSACHUSETTS, NEW HAMPSHIRE, NEW JERSEY, NEW YORK, NORTH CAROLINA, PENNSYLVANIA, PUERTO RICO, RHODE ISLAND, SOUTH CAROLINA, TENNESSEE, VERMONT, VIRGINIA, VIRGIN ISLANDS, OR WEST VIRGINIA,

SEND APPLICATIONS TO:

LICENSING ASSISTANCE TEAM
DIVISION OF NUCLEAR MATERIALS SAFETY
U.S. NUCLEAR REGULATORY COMMISSION, REGION I
2100 RENAISSANCE BOULEVARD, SUITE 100
KING OF PRUSSIA, PA 19406-2713

IF YOU ARE LOCATED IN:

ILLINOIS, INDIANA, IOWA, MICHIGAN, MINNESOTA, MISSOURI, OHIO, OR WISCONSIN,
SEND APPLICATIONS TO:

MATERIALS LICENSING BRANCH
U.S. NUCLEAR REGULATORY COMMISSION, REGION III
2443 WARRENVILLE ROAD, SUITE 210
LISLE, IL 60532-4352

Branch 2

ALASKA, ARIZONA, ARKANSAS, CALIFORNIA, COLORADO, HAWAII, IDAHO, KANSAS, LOUISIANA, MISSISSIPPI, 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 BRANCH
U.S. NUCLEAR REGULATORY COMMISSION, REGION IV
1600 E. LAMAR BOULEVARD
ARLINGTON, TX 76011-4511

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 JURISDICTIONS.

1. THIS IS AN APPLICATION FOR (Check appropriate item)

☐ A. NEW LICENSE

☐ B. AMENDMENT TO LICENSE NUMBER

☒ C. RENEWAL OF LICENSE NUMBER 37-28163-01

03030453

2. NAME AND MAILING ADDRESS OF APPLICANT (Include ZIP code)

James J. Anderson Construction Company, Inc
6958 Torresdale Avenue, Suite 300
Philadelphia, PA 19135

3. ADDRESS WHERE LICENSED MATERIAL WILL BE USED OR POSSESSED

Riverside Materials, Inc.
2870 E. Allegheny Avenue
Philadelphia, PA 19134

4. NAME OF PERSON TO BE CONTACTED ABOUT THIS APPLICATION

Jerry J. Naimoli, Vice President, RSO

BUSINESS TELEPHONE NUMBER

215-331-7150

BUSINESS CELLULAR TELEPHONE NUMBER

215-416-6662

BUSINESS EMAIL ADDRESS
JerryN@JJAConstruction.COM

SUBMIT ITEMS 5 THROUGH 11 ON 8-1/2 X 11" PAPER. THE TYPE AND SCOPE OF INFORMATION TO BE PROVIDED IS DESCRIBED IN THE LICENSE APPLICATION GUIDE.

5. RADIOACTIVE MATERIAL

a. Element and mass number; b. chemical and/or physical form; and c. maximum amount which will be possessed at any one time.

☒

6. PURPOSE(S) FOR WHICH LICENSED MATERIAL WILL BE USED.

☒

7. INDIVIDUAL(S) RESPONSIBLE FOR RADIATION SAFETY PROGRAM AND THEIR TRAINING EXPERIENCE.

☒

8. TRAINING FOR INDIVIDUALS WORKING IN OR FREQUENTING RESTRICTED AREAS.

☒

9. FACILITIES AND EQUIPMENT.

☒

10. RADIATION SAFETY PROGRAM.

☒

11. WASTE MANAGEMENT.

☒

12. LICENSE FEES (Fees required only for new applications, with few exceptions*) (See 10 CFR 170 and Section 170.31)

FEE CATEGORY

AMOUNT ENCLOSED \$

13. CERTIFICATION (Must be completed by applicant) THE APPLICANT UNDERSTANDS THAT ALL STATEMENTS AND REPRESENTATIONS MADE IN THIS APPLICATION ARE BINDING UPON THE APPLICANT.

THE APPLICANT AND ANY OFFICIAL EXECUTING THIS CERTIFICATION ON BEHALF OF THE APPLICANT, NAMED IN ITEM 2, CERTIFY THAT THIS APPLICATION IS PREPARED IN CONFORMITY WITH TITLE 10, CODE OF FEDERAL REGULATIONS, PARTS 30, 32, 33, 34, 35, 36, 39, AND 40, 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, 1948 62 STAT. 749 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.

CERTIFYING OFFICER - TYPED/PRINTED NAME AND TITLE

Jerry J. Naimoli, Vice President, RSO

SIGNATURE

Jerry Naimoli RSO

DATE

1-27-2014

FOR NRC USE ONLY

TYPE OF FEE	FEE LOG	FEE CATEGORY	AMOUNT RECEIVED	CHECK NUMBER	COMMENTS
APPROVED BY			\$	DATE	

5. **RADIOACTIVE MATERIAL** (a) Element and mass number (b) Chemical and/or physical form and (c) maximum amount which will be possessed at any one time.

For use in Troxler Models 3400 Series and 4640 Series

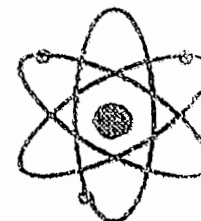
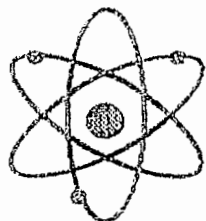
RADIOACTIVE MATERIAL:

5. Radioactive Material:			6. Proposed use
Element & Mass #	Form	Maximum possession limit	
CESIUM-137	Metal Solid	10mCi / source	To measure density - Model 4640. 3400 Series Gauges
	X.1218 X .8	Total - 50 mci	
AMERICIUM	Metal Solid	44mCi / source	To measure moisture - Model 3400 Series Gauge
241	X.1, X.1/2	Total - 220 mci	

6. **Purposes for which licensed material will be used:**
Licensed material will be used to measure density and moisture of construction material
7. **Individual(s) responsible for radiation safety program and their training experience:**
The individual responsible for radiation safety program and their training and experience is: Jerry Naimoli. 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.
8. **Training for individuals working in or frequenting restricted areas:**
All operators and RSO will have completed an approved radiation safety class provided by the manufacturer of Q/C Resources, certified I.E. manufacturer's trainer and/or QC Resources. Copies of certificates will be kept on file. Every three years, operators will have 49 CFR refresher training, subpart H of Federal Transportation regulations.

Q/C RESOURCE

Training Course Certification



This is to certify that

Christian Johnson

has successfully completed the RSO and Operator's course as required by the U.S. Nuclear Regulatory Commission and the Agreement States, in the Fundamentals of Safety and Gauge operation, for the use of Nuclear Moisture / Density equipment.

This course meets the requirements in NUREG 1556 Vol 1, Appendix D. It covered:

Atomic Physics

49 CFR Transportation

Operation

Radiation Safety

Risk

Field Applications

Dose/Shielding Calculations

ALARA

Calibration

Accidents/Storage

Measurement Theory

Maintenance

October 28, 2005

Date Of Training

8477

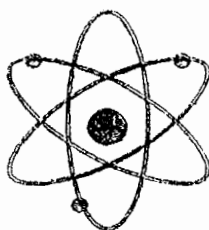
Certificate Number

Philip C. Palilla

*Instructor - Philip C. Palilla
Manufacturer's Rep*

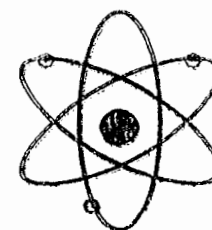
Q/C RESOURCE

Training Course Certification



This is to certify that

Nicholas J. Henwood



has successfully completed the RSO and Operator's course as required by the U.S. Nuclear Regulatory Commission and the Agreement States, in the Fundamentals of Safety and Gauge operation, for the use of Nuclear Moisture / Density equipment. This course meets the requirements in NUREG 1556 Vol 1, Appendix D. It covered:

Atomic Physics

49 CFR Transportation

Operation

Radiation Safety

Risk

Field Applications

Dose/Shielding Calculations

ALARA

Calibration

Accidents/Storage

Measurement Theory

Maintenance

April 16, 2009

Date Of Training

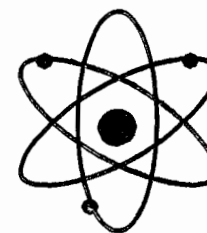
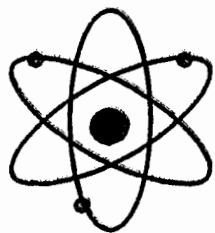
11734

Certificate Number

*Instructor - Phillip C. Palilla
Manufacturer's Rep*

Q/C RESOURCE

Training Course Certification



This is to certify that

Martin Mellor

has successfully completed the RSO and Operator's course as required by the U.S. Nuclear Regulatory Commission and the Agreement States, in the Fundamentals of Safety and Gauge operation, for the use of Nuclear Moisture / Density equipment.

This course meets the requirements in NUREG 1556 Vol 1, Appendix D. It covered:

Atomic Physics

49 CFR Transportation

Operation

Radiation Safety

Risk

Field Applications

Dose/Shielding Calculations

ALARA

Calibration

Accidents/Storage

Measurement Theory

Maintenance

July 20, 2012

Date Of Training

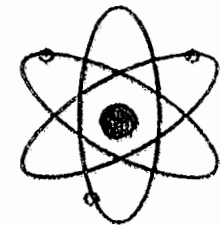
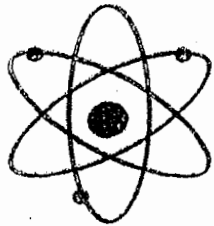
13448

Certificate Number

*Instructor - Philip C. Palilla
Manufacturer's Rep*

Q/C RESOURCE

Training Course Certification



This is to certify that

Jim Glowacki

has successfully completed the RSO and Operator's course as required by the U.S. Nuclear Regulatory Commission and the Agreement States, in the Fundamentals of Safety and Gauge operation, for the use of Nuclear Moisture / Density equipment. This course meets the requirements in NUREG 1556 Vol 1, Appendix D. It covered:

Atomic Physics

49 CFR Transportation

Operation

Radiation Safety

Risk

Field Applications

Dose/Shielding Calculations

ALARA

Calibration

Accidents/Storage

Measurement Theory

Maintenance

July 20, 2012

Date Of Training

13447

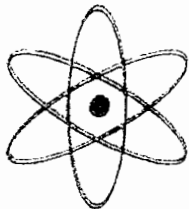
Certificate Number

Philip C. Palilla

*Instructor - Philip C. Palilla
Manufacturer's Rep*

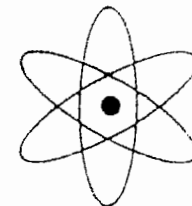
Q/C RESOURCE

TRAINING COURSE CERTIFICATION




This is to certify that

Nicholas Henwood



has completed annual refresher training in the proper transport of nuclear density gauges in accordance with CFR Title 49, Sections 170 - 189, as required by the U.S. Nuclear Regulatory Commission and the Agreement States.



Employee Signature

Employee Social Sec. #

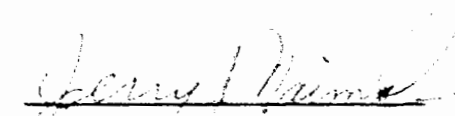
James J. Anderson Constr. Co., Inc.

Employer Name

I hereby certify that the above named employee has received training in the proper transport of nuclear density gauges in accordance with CFR Title 49, Sections 170 - 189, as required by the U.S. Nuclear Regulatory Commission and the Agreement States.

March 14, 2012
Date of Training

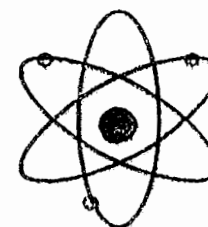
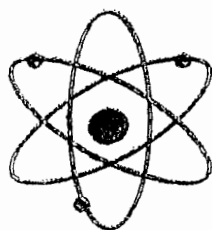
6958 Torresdale Ave., Phila., PA 19135
Location of Training Materials



Instructor Signature

Q/C RESOURCE

Training Course Certification



This is to certify that

Bryan J. Fleming

has successfully completed the RSO and Operator's course as required by the U.S. Nuclear Regulatory Commission and the Agreement States, in the Fundamentals of Safety and Gauge operation, for the use of Nuclear Moisture / Density equipment.

This course meets the requirements in NUREG 1556 Vol 1, Appendix D. It covered:

Atomic Physics

Radiation Safety

Dose/Shielding Calculations

Accidents/Storage

49 CFR Transportation

Risk

ALARA

Measurement Theory

Operation

Field Applications

Calibration

Maintenance

July 20, 2012

Date Of Training

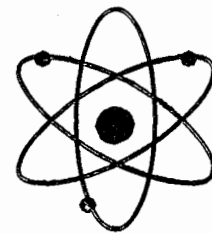
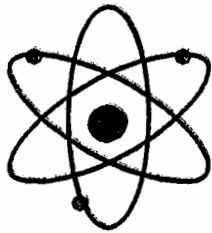
13446

Certificate Number

*Instructor - Philip C. Palilla
Manufacturer's Rep*

Q/C RESOURCE

Training Course Certification



This is to certify that

Martin Mellor

has successfully completed the RSO and Operator's course as required by the U.S. Nuclear Regulatory Commission and the Agreement States, in the Fundamentals of Safety and Gauge operation, for the use of Nuclear Moisture / Density equipment.

This course meets the requirements in NUREG 1556 Vol 1, Appendix D. It covered:

Atomic Physics

49 CFR Transportation

Operation

Radiation Safety

Risk

Field Applications

Dose/Shielding Calculations

ALARA

Calibration

Accidents/Storage

Measurement Theory

Maintenance

July 20, 2012

Date Of Training

13448

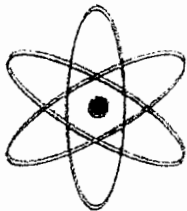
Certificate Number

Philip C. Palilla

*Instructor - Philip C. Palilla
Manufacturer's Rep*

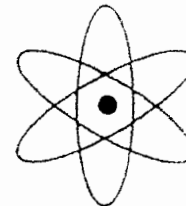
Q/C RESOURCE

TRAINING COURSE CERTIFICATION



This is to certify that

Christian Johnson



has completed annual refresher training in the proper transport of nuclear density gauges in accordance with CFR Title 49, Sections 170 - 189, as required by the U.S. Nuclear Regulatory Commission and the Agreement States.

Employee Signature

Employee Social Sec. #

James J. Anderson Constr. Co., Inc.

Employer Name

I hereby certify that I have received training in the proper transport of nuclear density gauges and have read, reviewed, and understood the requirements of CFR Title 49, Sections 170 - 189, as required by the U.S. Nuclear Regulatory Commission and the Agreement States.

March 14, 2012

Date of Training

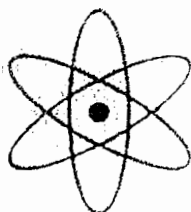
6958 Torresdale Ave., Phila., PA 19135

Location of Training Materials

Instructor Signature

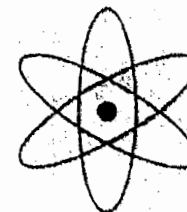
Q/C RESOURCE

TRAINING COURSE CERTIFICATION



This is to certify that

Christian Johnson



has completed annual refresher training in the proper transport of nuclear density gauges in accordance with CFR Title 49, Sections 170 - 189, as required by the U.S. Nuclear Regulatory Commission and the Agreement States.

Employee Signature

Employee Social Sec. #

James J. Anderson

Employer Name

My signature certifies that I have received training regarding the safe operation and transport of nuclear density gauges and have read, reviewed, and understand the emergency procedures instituted by my employer.

7/20/12

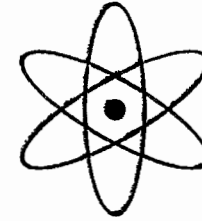
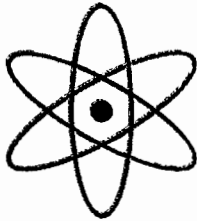
Date of Training

Location of Training Materials

Instructor Signature

Q/C RESOURCE

TRAINING COURSE CERTIFICATION



This is to certify that
Nicholas Henwood

has completed annual refresher training in the proper transport of nuclear density gauges in accordance with CFR Title 49, Sections 170 - 189, as required by the U.S. Nuclear Regulatory Commission and the Agreement States.



Employee Signature

Employee Social Sec. #

James J. Anderson Construction Co., Inc.

Employer Name

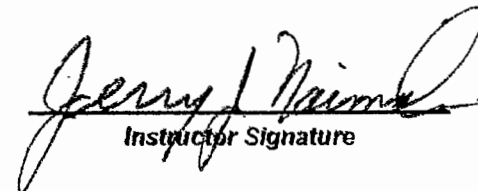
My signature certifies that I have received training regarding the safe operation and transport of nuclear density gauges and have read, reviewed, and understand the emergency procedures instituted by my employer.

March 12, 2013

Date of Training

6958 Torresdale Avenue, Philadelphia, PA

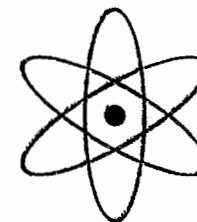
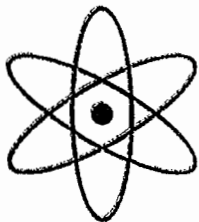
Location of Training Materials



Instructor Signature

Q/C RESOURCE

TRAINING COURSE CERTIFICATION



This is to certify that

Bryan Fleming

has completed annual refresher training in the proper transport of nuclear density gauges in accordance with CFR Title 49, Sections 170 - 189, as required by the U.S. Nuclear Regulatory Commission and the Agreement States.



Employee Signature

Employee Social Sec. #

James I. Anderson Construction Co., Inc.
Employer Name

My signature certifies that I have received training regarding the safe operation and transport of nuclear density gauges and have read, reviewed, and understand the emergency procedures instituted by my employer.

March 12, 2013
Date of Training

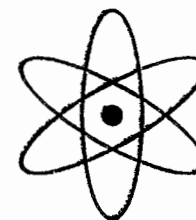
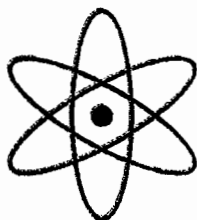
6958 Torresdale Avenue, Philadelphia, PA
Location of Training Materials



Instructor Signature

Q/C RESOURCE

TRAINING COURSE CERTIFICATION



This is to certify that
Jerry Naimoli

has completed annual refresher training in the proper transport of nuclear density gauges in accordance with CFR Title 49, Sections 170 - 189, as required by the U.S. Nuclear Regulatory Commission and the Agreement States.

Employee Signature

Employee Social Sec. #

James J. Anderson Construction Co., Inc.

Employer Name

My signature certifies that I have received training regarding the safe operation and transport of nuclear density gauges and have read, reviewed, and understand the emergency procedures instituted by my employer.

March 12, 2013

Date of Training

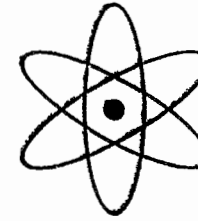
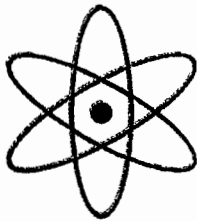
6958 Torresdale Avenue, Philadelphia, PA

Location of Training Materials

Instructor Signature

Q/C RESOURCE

TRAINING COURSE CERTIFICATION



This is to certify that
Christian Johnson

has completed annual refresher training in the proper transport of nuclear density gauges in accordance with CFR Title 49, Sections 170 - 189, as required by the U.S. Nuclear Regulatory Commission and the Agreement States.



Employee Signature

Employee Social Sec. #

James J. Anderson Construction Co., Inc.

Employer Name

My signature certifies that I have received training regarding the safe operation and transport of nuclear density gauges and have read, reviewed, and understand the emergency procedures instituted by my employer.

March 12, 2013

Date of Training

6958 Torresdale Avenue, Philadelphia, PA

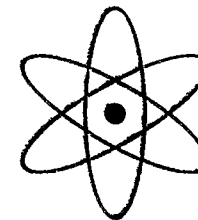
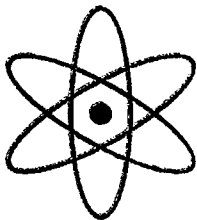
Location of Training Materials



Instructor Signature

Q/C RESOURCE

TRAINING COURSE CERTIFICATION



This is to certify that
Martin Mellor

has completed annual refresher training in the proper transport of nuclear density gauges in accordance with CFR Title 49, Sections 170 - 189, as required by the U.S. Nuclear Regulatory Commission and the Agreement States.

Employee Signature

Employee Social Sec. #

James J. Anderson Construction Co., Inc.

Employer Name

My signature certifies that I have received training regarding the safe operation and transport of nuclear density gauges and have read, reviewed, and understand the emergency procedures instituted by my employer.

March 12, 2013

Date of Training

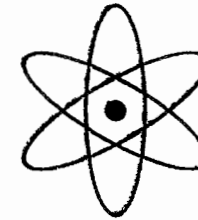
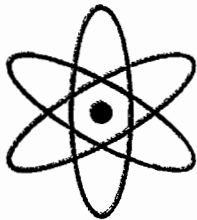
6958 Torresdale Avenue, Philadelphia, PA

Location of Training Materials

Instructor Signature

Q/C RESOURCE

TRAINING COURSE CERTIFICATION



This is to certify that

James Glowacki

has completed annual refresher training in the proper transport of nuclear density gauges in accordance with CFR Title 49, Sections 170 - 189, as required by the U.S. Nuclear Regulatory Commission and the Agreement States.

Employee Signature

Employee Social Sec. #

James L. Anderson Construction Co., Inc.

Employer Name

My signature certifies that I have received training regarding the safe operation and transport of nuclear density gauges and have read, reviewed, and understand the emergency procedures instituted by my employer.

March 12, 2013

Date of Training

6958 Torresdale Avenue, Philadelphia, PA

Location of Training Materials

Instructor Signature

FACILITIES AND EQUIPMENT

Independent physical controls to secure a portable gauge when stored at a licensed facility are:

1. The portable gauge or transportation case containing the portable gauge is stored inside a locked storage shed within a secured outdoor area, such as a fenced parking area with a locked gate;
2. The portable gauge or transportation case containing the portable gauge is stored in a room with a locked door within a secured building for which the licensee controls access by lock and key or by a security guard;
3. The portable gauge or transportation case containing the portable gauge is stored inside a locked, non-portable cabinet inside a room with a locked door if building is not secured;
4. The portable gauge or transportation case containing the portable gauge is stored in a separate secured area inside a secured mini-warehouse or storage facility;
5. The portable gauge or transportation case containing the portable gauge is physically secured to the inside structure of a secured mini-warehouse or storage.

Independent physical controls to secure portable gauges in while in transport are:

1. The locked transportation case containing the portable gauge is physically secured to a vehicle with brackets, and a chain or steel cable (attached to the vehicle) is wrapped around the transportation case such that the case can not be opened unless the chain or cable is removed. In this example, the transportation case would count as one control since the brackets would prevent easy removal of the case. The chain or cable looped only through the transportation case handle is not acceptable;
2. The portable gauge or transportation case containing the portable gauge is stored in a box physically attached to a vehicle, and the box is secured with (1) two independent locks, or (2) two separate chains or steel cables attached independently to the vehicle in such a manner that the box cannot be opened without the removal of the chains or cables, or (3) one lock and one chain or steel cable is attached to the vehicle in such a manner that the box cannot be opened without the removal of the chain or cable; and
3. The portable gauge or transportation case containing the portable gauge is stored in a locked trunk, camper shell, van, or other similar enclosure and is physically secured to the vehicle by a chain or steel cable in such a manner that one would not be able to open the case or remove the portable gauge without removal of the chain or cable. In this example, the transportation case would not count as one control because it is portable and could be easily removed.

RADIATION SAFETY OFFICER

The Radiation Safety Officer (RSO) Jerry J. Naimoli, will have radiation protection training from the Manufacturer of the device and the radioactive materials license. The duties of the RSO are as follows:

1. To administer the radiation safety program on a daily basis and ensure that all terms of the license and provisions are implemented.
2. To ensure that leak tests of the devices and a physical inventory are performed at six month intervals. Records will include make, model, serial number, location, date and initials of the RSO.
3. To ensure that all operators receive training in the licensee's policies and procedures, and are certified by training from the manufacturer before using devices; and that annual refresher training is provided to all operators.
4. To maintain all records required by the licensing agency and have them readily available for inspection.
5. To ensure that all devices are properly secured against unauthorized removal or use.
6. To collect, return and distribute personnel badges on time, review dosimetry reports and assist license management in conducting an annual internal audit to evaluate handling procedures, compliance with requirements, and possible methods to reduce exposure. The results of each audit will be reviewed by licensee management and any steps necessary to correct deficiencies will be taken.
7. To serve as a point of contact and assist in emergencies involving the radioactive material device.
8. To take any action necessary to eliminate unsafe conditions and prevent unnecessary radiation exposure. This must include the authority to halt operations involving use of gauges, if it is judged to be necessary to protect health and safety.
9. To ensure that devices are serviced as necessary at a manufacturer's authorized location, and that receipt and return of sources/devices are properly documented.
10. To ensure that cleaning and maintenance of gauges is performed in accordance with the manufacturers directions, and that daily shutter checks are done.
11. To ensure that gauges are used properly and are not abused, and that required labels are legible and in good condition.

The RSO will be provided with adequate time to discharge all radiation protection duties.

WASTE MANAGEMENT:

Device will be returned to the manufacturer as per the following:

**Troxler Electronic Laboratories, Inc.**

PO Box 12057 • 3008 Cornwallis Rd. • Research Triangle Park, NC 27709
Phone: (919) 549-8661 • Fax: (919) 549-0761 • www.troxlerlabs.com

Re: Troxler Gauge Disposal Policy

To Whom It May Concern:

Troxler is authorized to receive nuclear gauges for disposal under radioactive material license number 032-0182-1 issued by the State of North Carolina.

Nuclear gauges may be returned to Troxler for source removal and disposal subject to the following conditions:

1. No gauge or source will be accepted without a Returned Goods Authorization from Troxler.
2. Leaking sources will not be accepted.
3. Acceptance of damaged gauges depends on the feasibility of safely removing the sources. Troxler reserves the right to return any gauge to the customer if removal of the sources is deemed impractical for any reason.
4. Sources for which a licensed disposal pathway is not available will not be accepted.

Troxler will provide an acknowledgement of receipt to the customer upon acceptance of a source. Please contact Troxler for current disposal pricing and availability information.

Sincerely,

Stephen A. Browne
Corporate Radiation Safety Officer

December 2013

RADIATION SAFETY PROGRAM

RADIATION SAFETY OFFICER

- A. Jerry J. Naimoli has been designated as the company Radiation Safety Officer and will assume the duties and responsibilities that include the following:
 - 1. To ensure that all terms and conditions of the license are being met and that the information contained in the license is up-to-date.
 - 2. To ensure that the equipment has been leak tested every six (6) months and that the leak test is performed in the manner prescribed by the equipment manufacturer.
 - 3. To ensure that the use of the equipment is only by individuals that have been authorized by the Radiation Safety Officer and that all users wear personnel monitoring badges when utilizing the equipment.
 - 4. To maintain the records as required by the Nuclear Regulatory Commission. These records shall include personnel quarterly exposure records, leak test reports and training certificates for all operators.
 - 5. To ensure that the equipment is properly secured against unauthorized removal at all times, especially when it is not in use.
 - 6. To serve as a point of contact and give assistance in case an emergency such as damaged equipment or theft. At that point the NRC and Troxler Electronics will be notified.
 - 7. To ensure that all users have read and understand the radiation safety operating and emergency procedures as directed by the Radiation Safety Officer and Troxler Electronics.
 - 8. To post "Caution Radioactive Material" on the storage location, along with NRC Form #3 "Notice to Employees" nearby in a visible area.
 - 9. To conduct a written six (6) month inventory of all nuclear gauges, and kept on file for inspection.

EMERGENCY PROCEDURES

- A. In the event of physical damage to a gauge, the following will be done.
 - 1. Immediately cordon off an area around the gauge of at least 15 feet.
 - 2. If a vehicle is involved, it will be stopped until the extent of contamination, if any, can be established.
 - 3. A visual inspection of the gauge will be made to determine if the source housing and/or shielding has been damaged.
 - 4. At the earliest possible time, when the situation is under control, we will contact our Radiation Safety Officer at (215) 331-7150. We will describe the present conditions and follow his instructions.
- B. In the event the gauge is lost or stolen, we will immediately notify the RSO, who in turn will contact the NRC and Troxler Electronics.

A COPY OF THIS RADIATION SAFETY PROGRAM WILL BE KEPT WITH THE GAUGE AT ALL TIMES FOR REFERENCE WHEN NEEDED.

OPERATING PROCEDURES

1. All operators shall have completed the manufacturer's training and received training in the licensee's policies and procedures, and must wear an assigned personnel dosimetry badge before transporting or using the device. Badges must not be shared and only the person to whom a badge was assigned may wear it.
2. Obtain keys to storage and remove the device. Make sure that the source is in the safe (shielded) position by performing the daily shutter (sliding block) check, and locking the source rod in the shielded position.
3. Make complete entry to utilization log, including the results of the shutter check.*
4. Lock device in its carrying case and lock in transport vehicle.
5. Never leave device unattended at job site unless it is secured in locked storage to which only authorized users have a key.
6. Clear area of all unnecessary persona before use of device.
7. Work safely with device following manufacturer's operating procedures and utilizing the radiation safety principles of time, distance and shielding. Do not expose yourself or others to the unshielded source. Stand back from device when possible.
8. When job is finished, make sure the source holder is locked in the "off" or closed position and lock device in carrying case. Place carrying case in locked storage (such as trunk of car); to which only authorized users have a key.
9. Return device to permanent storage place and lock it up after checking to make sure that the shutter (sliding block) is fully closed.*
10. Complete utilization log with time in and signature.
11. Store dosimetry badges in radiation free (low background) area.
12. Report any device malfunctions, unusual occurrences, or difficulties in using a device to the Radiation Safety Officer.

*NOTE: This only applies to devices with a retractable source rod.

TRANSPORTATION PROCEDURES

1. Before removing the device from storage, a daily utilization log entry will be made and the operator will obtain the following and keep them available:
 - a. Copy of the license;
 - b. Manufacturer's instruction manual and the company's operating and emergency procedures;
 - c. Copy of the latest results of test for leakage and/or contamination for the device used; and
 - d. Shipping papers.
2. The device will be transported in its' carrying case, locked in the truck of a passenger vehicle, braced and blocked to prevent movement during transportation. If transported in an open bed vehicle, the device will be locked in a steel cabinet, bolted to the bed of the truck. The transportation vehicle will be secured at all times when not under the direct supervision of a qualified person.
3. Any vehicle used for transporting gauges shall be driven only for purposes associated with use or transport of the contained radioactive material, by a person either qualified to use the material, or accompanied by a person so qualified. No passengers shall be carried unless they are also involved in work under this license.

EMERGENCY PROCEDURES

1. In the event of an accident or incident involving the device, the following will be performed:
 - Immediately cordon off an area around the device or the area of the incident, of at least a 15 foot radius;
 - If a vehicle is involved, it must be stopped until the extent of the damage is established;
 - Visual inspection of the device should be made from a distance to determine the degree of damage and any visible cracking or deforming of surfaces; and
 - At the earliest possible time, when the situation is under control, you must contact the Radiation Safety Officer (RSO). Describe the conditions and follow instructions. You or the RSO must also contact local authorities and the Department as soon as possible. After working hours, the New Jersey State Warning Point should be contacted.
 - **Do not touch or handle the source or source rod, even if it has broken off or become detached from the device.** Wait for emergency assistance from the consultant that has agreed to assist you, or the approval of the Department, before any efforts are made to retrieve a source or source rod.
2. In the event that the gauge is involved in an accident or incident, or is lost or stolen, you must notify the RSO and New Jersey State Department of Health as soon as possible.

These instructions must be kept with the gauge operator and emergency telephone numbers will be kept visible in the cab of the vehicle.

Radiation Safety Officer:	Office	215-331-7150
	Cell	215-416-6662

U.S. NUCLEAR REGULATORY COMMISSION – Radioactive Materials Program:

Normal Business Hours: 8am-5pm Monday - Friday	1-301-816-5100
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Evening and weekend hours / NRC Hot-line	1-301-951-0550
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	1-301-427-4056
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Manufacturer:	Troxler Electronic Laboratories, Inc.
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Local Police Department and Local Fire Department:	911
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3. After an accident or incident, the device is not to be used without the approval of the RSO. Generally,

a survey and leak test will have to be performed before the device can be allowed to be used again.

[illegible]

*MOISTURE/DENSITY GAUGE ONLY

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

1/27/14, and to inform you that the initial processing which includes an administrative review has been performed.

☒ Renew (37-28163-01)
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** 583169.
When calling to inquire about this action, please refer to this control number.
You may call us on (610) 337-5398, or 337-5260.