



UNITED STATES  
**NUCLEAR REGULATORY COMMISSION**

REGION III  
2443 WARRENVILLE ROAD, SUITE 210  
LISLE, ILLINOIS 60532-4352

**TELEFAX TRANSMITTAL**

DATE February 18, 2015

NUMBER OF PAGES 9

SEND TO David A. Chenoweth, Radiation Safety Officer, Wallace & Associates, LLC, NRC License 21-32557-01

LOCATION Three Rivers, Michigan

FAX NUMBER (866) 557-9128

☐ VERIFY BY CALLING

FROM: Bill Reichhold  
(Sender)

TELEPHONE NUMBER (630) 829-9839

FAX NUMBER (630) 515-1078

If you do not receive the complete fax transmittal, please contact the sender as soon as possible at the telephone number provided above.

MESSAGE See accompanying documents.

**NOTICE**

This message is intended only for the use of the individual or entity to which it is addressed and may contain information that is privileged, confidential, or exempt from disclosure under applicable law. If the reader of this message is not the intended recipient or the employee responsible for delivering the message to the intended recipient, you are hereby notified that any dissemination, distribution or copying of this communication is strictly prohibited. If you received this communication in error, please notify the sender immediately by telephone and return the original to the above address, by U.S. Mail. Thank You.

As we discussed by telephone on February 17, 2015, it appears your renewal application addresses items for industrial radiography (references to 10 CFR Part 34) rather than portable gauging devices. The Nuclear Regulatory Commission (NRC) issued Consolidated Guidance about Materials Licenses: Program-Specific Guidance about Portable Gauge Licenses in NUREG-1556, Volume 1, Revision 1, in November 2001, to provide guidance for completing an application for the use of sealed sources in portable gauging devices. NUREG-1556, Volume 1, Revision 1, outlines the necessary information needed to complete your renewal application. Your renewal application did not sufficiently all of the information required by NUREG-1556, Volume 1, Revision 1 and appeared to address items for industrial radiography rather than portable gauging devices.

1. Please resubmit your renewal application using Appendix B, "Suggested Format for Providing Information Requested in Items 5 through 11. See copy enclosed of Appendix B. You may also view a copy of NUREG-1556, Volume 1, Revision 1 at the NRC website at <http://www.nrc.gov/reading-rm/doc-collections/nuregs/staff/sr1556/v1/r1/>.
2. Also, as we discussed, it appears you only wish to use the Troxler model 3216 portable gauges. As we discussed by telephone, your current license lists a number of Troxler gauges you did not request on your renewal. Namely, Troxler models 3400 series, 4640, 4545, 4300, and 3241 series portable gauges. Please specify what happened to these gauges OR if you never purchased these gauges please state so. Please confirm that you only wish to use the Troxler model 3216 gauges.
3. Please specify the total activity you will need for each radionuclide listed on your license. For example, Americium-241, total activity 88 millicuries.
4. Please specify if you will perform non-routine maintenance on the Troxler Model 3216 gauges, OR commit to having non-routine maintenance performed by Troxler or other companies authorized to perform non-routine maintenance on the Troxler Model 3216 gauges. If you plan to perform non-routine maintenance on the Troxler gauges you will need to submit additional information (see Appendix G in NUREG-1556, Volume 1, Revision 1).

Please send a facsimile (630- 515-1078) of your response to the above within 14 days and state, Response to Control 585828. Please include a cover letter on company letterhead, dated and signed (signed by an individual who is authorized to sign official documents on behalf of the licensee) with your response letter. Please call me at 630-829-9839 if you have any questions.

*In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice," a copy of this facsimile and the attached documents will be available electronically for public inspection in the NRC Public Document Room or from the Publicly Available Records (PARS) component of NRC's document system (ADAMS). The NRC's document system is accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html> (the Public Electronic Reading Room).*

From the desk of:

A handwritten signature in cursive script, appearing to read "Bill Reichhold".

Bill Reichhold

## **Appendix B**

### **Suggested Format for Providing Information Requested in Items 5 through 11**

# **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: _____ 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)
		Americium-241	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)

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
<b>7. INDIVIDUAL(S) RESPONSIBLE FOR RADIATION SAFETY PROGRAM AND THEIR TRAINING AND EXPERIENCE – RADIATION SAFETY OFFICER</b>  Name: _____	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 type="checkbox"/>	<input type="checkbox"/>
<b>8. 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 type="checkbox"/>	<input type="checkbox"/>
<b>9. 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."	<b>Separate Item 9 Response</b>  <b>Need Not Be Submitted With Application</b>	
<b>10. 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.	<b>Need Not Be Submitted With Application</b>	
<b>10. 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.	<b>Need Not Be Submitted With Application</b>	
<b>10. 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 type="checkbox"/>	<input type="checkbox"/>

APPENDIX B

Item No. And Title	Suggested Response	Yes	Alternative Procedures Attached
<b>10. RADIATION SAFETY PROGRAM – MATERIAL RECEIPT AND ACCOUNTABILITY</b>	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 type="checkbox"/>	<input type="checkbox"/>
<b>10. RADIATION SAFETY PROGRAM – OCCUPATIONAL DOSIMETRY</b>	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 type="checkbox"/>	<input type="checkbox"/>
<b>10. RADIATION SAFETY PROGRAM – PUBLIC DOSE</b>	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.	<b>Need Not Be Submitted With Application</b>	
<b>10. RADIATION SAFETY PROGRAM – OPERATING AND EMERGENCY PROCEDURES</b>	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 type="checkbox"/>	<input type="checkbox"/>
	<p style="text-align: center;"><b>OR</b></p> <p>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.</p>	<input type="checkbox"/>	
<b>10. RADIATION SAFETY PROGRAM – LEAK TEST</b>	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 type="checkbox"/>	<input type="checkbox"/> <b>The information in Appendix J supporting a request to perform leak testing and sample analysis is attached.</b>



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 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 type="checkbox"/>	<input type="checkbox"/> <b>The information listed in Appendix G supporting a request to perform non-routine maintenance in-house is attached.</b>
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.	<b>Need Not Be Submitted With Application</b>	
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.	<b>Need Not Be Submitted With Application</b>	