
From: Markus Hannig <markus.hannig@betacontrolinc.com>
Sent: Tuesday, July 21, 2015 12:11 PM
To: Miller, John
Subject: [External_Sender] RE: License renewal application - Mail Control No. 586850
Attachments: Emergency Procedures 20150715.pdf; DOT Certificate 2015.pdf; Response letter 20150721.pdf

Hello John,

Please find attached my response letter signed and dated and again with all the necessary attachments.

Kindest Regards,

Markus Hannig

From: Miller, John [mailto:John.Miller@nrc.gov]
Sent: Wednesday, June 17, 2015 10:36 AM
To: markus.hannig@betacontrolinc.com
Subject: License renewal application - Mail Control No. 586850

betacontrol of America, Inc.
License No. 29-23394-01
Docket No. 030-21015
Control No. 586850

Mr. Hannig

1. Item 3. of your application to renew your radioactive material license is blank. Please provide the address where radioactive material will be used or possessed. Your current license states "licensed material may be used at temporary job sites of the licensee anywhere in the United States where the U.S. Nuclear Regulatory Commission maintains jurisdiction for regulating the use of licensed material, including areas of exclusive Federal jurisdiction within Agreement States".
2. In Item 5. of your renewal application, you have provided a table of the radioactive sealed sources and devices that you wish to have authorized on your license. Unfortunately I was not able to locate a registry of radioactive sealed source and devices safety evaluation that confirmed that the sealed source made by Eckert and Ziegler, Model Am1.G22 can be mated with gauge Model MK1.0. Please submit additional information to support your request. You may want to contact the manufacturer for assistance. In addition the total activity column is blank for the last two sources.
3. Item 6. of your application describes how the radioactive sealed sources will be used by the end users, namely the general licensees. Please provide a description of how you plan on using the sources. Condition 9. of your current license may be useful in providing this information.
4. The training certificate that you provided as a credential for yourself as the RSO was dated 2006. DOT refresher training is required for Hazmat employees every three years. Please submit updated training credentials for yourself or indicate how you plan to comply with this regulatory requirement.
5. Please submit the names of your authorized users as well as their training and experience. NUREG-1556, Vol.18, Section 8.7.2 recommends that authorized users will receive the training described in Appendix H or you may submit equivalent training.

6. NUREG-1556, Vol.18, Section 8.10.4 recommends that NVLAP – accredited dosimetry will be processed by a NVLAP – accredited entity. Please confirm that the dosimetry that you described in your application is NVLAP accredited.
7. NUREG-1556, Vol.18, Section 8.10.6 recommends that you submit operating and emergency procedures. Please submit your procedures. Section 8.10.6 will provide you guidance for subjects to be addressed in your procedures.
8. In your renewal application, you indicated that Kr-85 sources are recycled in the USA by authorized companies. Please confirm that Kr-85 sources will be sent to a licensed facility for disposal.

In order to continue the review of your renewal application for your NRC license to use radioactive materials, we need additional information. If you have any questions, please contact me (610-337-5089).

Please respond in writing with a signed letter. You may submit the signed response document by hard copy, or as a pdf copy attached to an email, or by facsimile to 610-337-5269. Please be sure to include the Control No. 586850 on your response. We would appreciate a response within 30 days in order to expedite review of the license renewal application.

Thank you for your cooperation.

John J. Miller
Health Physicist
Division of Nuclear Materials Safety

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