



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
REGION IV  
1600 EAST LAMAR BLVD  
ARLINGTON, TEXAS 76011-4511

EMAIL



**Name:** Vincent Troy Curnutt      Docket: 030-38843  
**Organization:** Troy Curnutt Consulting      Control: 587048  
**E-mail Address:** nukemdude@gmail.com  
**From:** Jacqueline D. Cook  
**Date:** August 31, 2015  
**Subject:** Application dated February 23, 2015 and Email Response dated June 10, 2015 to Request for Additional Information for New License  
**Pages:** 2

Mr. Curnutt:

Per your application dated February 23, 2015, and email response dated June 10, 2015, to request for additional information for new license, the items on the next page are deficiencies which require your response. **Please respond to this e-mail by Friday, September 4, 2015.** If you are unable to respond by this due date, please don't hesitate to contact me so we can discuss an extension to the date. Our fax number is (817) 200-1263. You may respond by e-mail in pdf format if you'd like. My email address is [Jackie.Cook@nrc.gov](mailto:Jackie.Cook@nrc.gov). When responding to this e-mail, please include the license, docket and control numbers located at the top of this page.

Thanking you in advance for your cooperation, assistance, and prompt response in this matter.

/RA/  
Jacqueline D. Cook  
Senior Health Physicist

**PUBLIC**

- ☐ Immediate Release  
☒ Normal Release

**NON-PUBLIC**

- ☐ A.3 Sensitive-Security Related  
☐ A.7 Sensitive Information  
☐ Other:

Reviewer: JDC Date: 8/31/15

1. Please clarify if you are proposing to use the sources previously requested in your application dated February 23, 2015, are you proposing to just use the sealed sources in which you submitted a sealed source and device registry sheet, or are you using a combination of the two.
2. Please note that TLDs and OSLs are used to record dose. Although the electronic dosimeter is not a dose of record, it is a good tool for radiation protection. The electronic dosimeter gives an instant dose reading but please note that you will need a TLD or an OSL whole body and/or ring dosimeter to document dose of record.

An alternative to not using TLDs and OSLs whole body and/or ring is to demonstrate through mathematical calculations and assumptions that you do not need dosimetry if your projected exposure in a year is less than 10% of the Part 20 occupational dose limits (less than 500 mrem whole body, less than 1,500 mrem lens of the eye, and 5,000 mrem skin/extremities).

If you want to apply for an exemption to use the electronic dosimeter as dose of record in lieu of a TLD, OSL, or provide an evaluation, you must request an exemption to the regulations and we'll have to send it to our Office of Nuclear Materials Safety and Safeguards as a technical assistance request. If you decide to request an exemption, please submit a description as outlined in the attached (See Item 10, Applications for Exemptions, of NUREG-1556, Vol. 18).

Please specify your option.

3. Please expand the safe use of radionuclides and emergency procedures to include and/or better describe the following:
  - Steps to take to keep radiation exposures ALARA
4. Please note that although you commit to following the model procedures in NUREG-1556, Volume 18, Appendix O for conducting leak tests, please note that the formula for determining the minimal detectable activity (MDA) is incorrect.

Please use the correct formula for determining MDA found in the model procedures in NUREG-1556, Volume 5, Appendix P (<http://www.nrc.gov/reading-rm/doc-collections/nuregs/staff/sr1556/v5/>).

**PUBLIC**

- ☐ Immediate Release  
☒ Normal Release

**NON-PUBLIC**

- ☐ A.3 Sensitive-Security Related  
☐ A.7 Sensitive Internal  
☐ Other: \_\_\_\_\_

Reviewer: gpc Date: 8/31/15