



**UNITED STATES  
NUCLEAR REGULATORY COMMISSION**  
REGION I  
2100 RENAISSANCE BLVD.  
KING OF PRUSSIA, PA 19406-2713

August 3, 2016

Craig Godwin, Radiation Safety Officer  
I2S, LLC  
1070 North Farms Road  
Wallingford, CT 06492

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION, MAIL CONTROL NO. 591408

Dear Mr. Godwin:

This is in reference to your application dated June 17, 2016, requesting a new NRC License No. 06-21253-03. In order to continue our review, we need the following additional information:

1. Item 6 of your application states that you plan to service gauges manufactured by I2S or LFE. We understand that some LFE gauges are now distributed by other manufacturers. Confirm if you are requesting authorization to service those gauges under successor manufacturer names.
2. Item 6 also refers to the LFE Corporation Model SU-S3 thickness gauge. Please note that this gauge is no longer distributed by LFE Corporation. This model was since distributed by Eurotherm Gauging Systems Inc., then EGS Gauging Inc. and is currently authorized to be distributed by Thermo EGS Gauging Inc. The Model SU-S3 will be listed on your license under the currently authorized name, but you may service the Model SU-S3 under any of its former distributor names. Please confirm if you intended to request to provide training in the use only of the Model SU-S#, or other LFE/Eurotherm/EGS/Thermo EGS gauges as well.
3. Based on the information in your application, I understand that you will NOT be performing installation of sources into, or their removal from, the gauges. If my understanding is not correct, please inform me in writing, and provide procedures for installation of sources into the gauges, and removal of sources from the gauges.
4. Confirm that, in addition to the training information provided in your application, your training for persons who will perform servicing of gauges will include the following:
  - Successful completion of a written examination, with review of incorrect answers
  - On-the-job training with supervised hands-on experience
  - Practical examination consisting of an assessment by the RSO to ensure that each authorized user is qualified to work independently
  - Discussion and/or drill on emergency procedures that may be required during field servicing of gauges.
5. Confirm that training will be provided by qualified individuals such as those who currently meet the criteria for authorized users.

6. Confirm that you will develop and implement a procedures for obtaining an agreement with customers outlining the responsibilities of both the customer and service provider, when performing service operations at a customer's facility.
7. Confirm that you will develop instructions for to keep licensed materials under control and under immediate surveillance during use; control access to work sites; and for maintaining security during storage at customer facilities.
8. Confirm that you will develop and implement procedures for identifying and reporting to the NRC defects and noncompliance as required by 10 CFR 21.21(a).
9. Confirm that you will follow the manufacturer's procedures for inspection, maintenance, and operations that involve access to the sources and safety systems, if applicable.
10. Confirm that you will establish and manage a records system for radiation safety activities and records important for decommissioning.
11. The Emergency Guidance provided with your application does not include procedures and actions to be taken if a source ruptures, including actions to prevent the spread of contamination and minimize inhalation or ingestion of licensed materials. Confirm that your procedures for a leaking source or source rupture that causes contamination, although a rare occurrence, will provide instruction for controlling the area, preventing the spread of contamination, and minimizing inhalation or ingestion of the material.
12. The Emergency Guidance for some of the emergency types (contamination, stuck shutter, fall/collision, loss/theft, and fire) state to seek other professional assistance, such as the gauge manufacturer or another licensed service individual. Some of these procedures seem to be more appropriate for the gauge user, rather than a service provider. Confirm if these procedures define the limit of the services you intend to provide. If you will provide additional assistance gauge customers with these types of emergencies, describe any additional procedures or instructions to your authorized users.

We will continue our review upon receipt of this information. Please reply to my attention at:

Betsy Ullrich  
Mail Control No. 591408  
USNRC, Region I  
Division of Nuclear Materials Safety  
2100 Renaissance Boulevard  
King of Prussia, PA 19406

In order to continue prompt review of your application, we request that you submit your response to this letter within 30 calendar days from the date of this letter.

An electronic version of the NRC's regulations is available on the NRC Web Site at: [www.nrc.gov](http://www.nrc.gov). Additional information regarding use of radioactive materials may be obtained on

the NRC Web Site at: <http://www.nrc.gov/materials/miau/mat-toolkits.html>. This site also provides the link to the toolbox for updated information on the revised regulations for naturally-occurring and accelerator-produced radioactive materials (NARM).

In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice," a copy of this letter will be available electronically for public inspection in the NRC Public Document Room or from the NRC's document system (ADAMS). ADAMS is accessible from the NRC Web Site at: <http://www.nrc.gov/reading-rm/adams.html>. Please be aware that you may request that certain portions of your submittal to NRC be withheld from public disclosure as proprietary information. To do this, you must execute an affidavit as specified in 10 CFR 2.390. You must list all portions that you wish to be held proprietary, along with your reasoning as to why that is appropriate. While it is allowable, please refrain from submitting proprietary information in support of a license unless necessary. Keep in mind that all NRC licenses are considered to be in the public domain, and therefore may be viewed by any member of the public who requests to see them.

If you have any questions regarding this request for additional information, please contact me at 610-337-5040 or via electronic mail at [elizabeth.ullrich@nrc.gov](mailto:elizabeth.ullrich@nrc.gov).

Thank you for your cooperation.

Sincerely,

*/RA/*

Betsy Ullrich, Senior Health Physicist  
Commercial, Industrial, R&D  
and Academic Branch  
Division of Nuclear Materials Safety  
Region I

License No. 06-21253-03  
Docket No. 030-38931  
Mail Control No. 591408

cc: Frank Byus, General Manager

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If you have any questions regarding this request for additional information, please contact me at 610-337-5040 or via electronic mail at [elizabeth.ullrich@nrc.gov](mailto:elizabeth.ullrich@nrc.gov).

Thank you for your cooperation.

Sincerely,

/RA/

Betsy Ullrich, Senior Health Physicist  
Commercial, Industrial, R&D  
and Academic Branch  
Division of Nuclear Materials Safety  
Region I

License No. 06-21253-03  
Docket No. 030-38931  
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cc: Frank Byus, General Manager

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**SUNSI Review Complete:** Betsy Ullrich

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