

Simmons, Michelle

From: Andrew Pilskalns <ap.castlerock@gmail.com>
Sent: Thursday, September 15, 2016 7:01 PM
To: Simmons, Michelle
Subject: [External_Sender] RE: RE: RE: RE: NRC License Renewal 25-29229-01: Deficiency Letter

Michelle,

Yes, I Andrew Pilskalns agree to that statement. Sorry for the oversight.

Sincerely,
ANDREW PILSKALNS, P.E.



1114 East Babcock
Bozeman, Montana
59715

Ph: (406)-586-9533
Cell: (406)-539-8439

ap.castlerock@gmail.com
www.castlerocker.com

SERVING; MT, ID, UT, HI, WY, CO, NV, ND

PUBLIC
☒ Immediate Release
☒ Normal Release
NON-PUBLIC
☐ A.3 Sensitive-Security Related
☐ A.7 Sensitive Internal
☐ Other: _____

Reviewer: MS Date: 10/28/16

CONFIDENTIALITY NOTICE: The information contained in this email message and any attachment(s) is the **property of Castle Rock Geotechnical Engineering, Inc.** and may be **protected by state and federal laws** governing disclosure of private information. It is intended solely for the use of the entity to which this email is addressed. If you are not the intended recipient, you are hereby **notified that reading, copying or distribution of this transmission is STRICTLY PROHIBITED.** The sender has not waived any applicable privilege by sending the accompanying transmission. If you have received this transmission in error, please notify the sender by replying to this e-mail and delete the message and attachment(s) from your system.

From: Simmons, Michelle [mailto:Michelle.Simmons@nrc.gov]
Sent: Thursday, September 15, 2016 7:17 AM
To: Andrew Pilskalns
Subject: RE: RE: RE: RE: NRC License Renewal 25-29229-01: Deficiency Letter

Thank you. You forgot to check one box. Please make the following commitment:

"The gauge manufacturer or other person licensed by the NRC or an Agreement State will perform nonroutine maintenance or repair operations that require detaching the source rod from the gauge."

From: Andrew Pilskalns [<mailto:ap.castlerock@gmail.com>]

Sent: Wednesday, September 14, 2016 5:37 PM

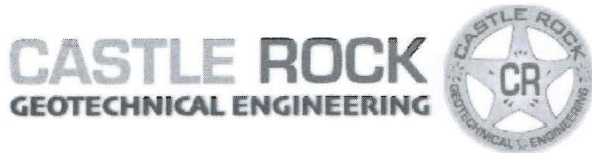
To: Simmons, Michelle <Michelle.Simmons@nrc.gov>

Subject: [External_Sender] RE: RE: RE: NRC License Renewal 25-29229-01: Deficiency Letter

Forgot to send with receipt.

Sincerely,

ANDREW PILSKALNS, P.E.



1114 East Babcock
Bozeman, Montana
59715

Ph: (406)-586-9533

Cell: (406)-539-8439

ap.castlerock@gmail.com

www.castlerocker.com

SERVING: MT, ID, UT, HI, WY, CO, NV, ND

CONFIDENTIALITY NOTICE: The information contained in this email message and any attachment(s) is the **property of Castle Rock Geotechnical Engineering, Inc.** and may be **protected by state and federal laws** governing disclosure of private information. It is intended solely for the use of the entity to which this email is addressed. If you are not the intended recipient, you are hereby **notified that reading, copying or distribution of this transmission is STRICTLY PROHIBITED.** The sender has not waived any applicable privilege by sending the accompanying transmission. If you have received this transmission in error, please notify the sender by replying to this e-mail and delete the message and attachment(s) from your system.

From: Simmons, Michelle [<mailto:Michelle.Simmons@nrc.gov>]

Sent: Wednesday, September 14, 2016 2:23 PM

To: Andrew Pilskalns

Subject: RE: RE: RE: NRC License Renewal 25-29229-01: Deficiency Letter

Sir,

I need the form filled out. Your letter did not completely answer all the questions or make any commitments to follow the guidance documents NUREG 1556 Volume 1, Revision 2 or the necessary regulations. If I don't have the form filled out completely, I can't renew your license.

Simmons, Michelle

From: Andrew Pilskalns <ap.castlerock@gmail.com>
Sent: Wednesday, September 14, 2016 5:33 PM
To: Simmons, Michelle
Subject: [External_Sender] RE: RE: RE: NRC License Renewal 25-29229-01: Deficiency Letter
Attachments: SCAN0021.PDF

Please see attached form, and let me know if there is anything else.

Sincerely,
ANDREW PILSKALNS, P.E.

CASTLE ROCK
GEOTECHNICAL ENGINEERING



1114 East Babcock
Bozeman, Montana
59715

Ph: (406)-586-9533
Cell: (406)-539-8439

ap.castlerock@gmail.com
www.castlerocker.com

SERVING: MT, ID, UT, HI, WY, CO, NV, ND

CONFIDENTIALITY NOTICE: The information contained in this email message and any attachment(s) is the **property of Castle Rock Geotechnical Engineering, Inc.** and may be **protected by state and federal laws** governing disclosure of private information. It is intended solely for the use of the entity to which this email is addressed. If you are not the intended recipient, you are hereby **notified that reading, copying or distribution of this transmission is STRICTLY PROHIBITED.** The sender has not waived any applicable privilege by sending the accompanying transmission. If you have received this transmission in error, please notify the sender by replying to this e-mail and delete the message and attachment(s) from your system.

From: Simmons, Michelle [mailto:Michelle.Simmons@nrc.gov]
Sent: Wednesday, September 14, 2016 2:23 PM
To: Andrew Pilskalns
Subject: RE: RE: RE: NRC License Renewal 25-29229-01: Deficiency Letter

Sir,

I need the form filled out. Your letter did not completely answer all the questions or make any commitments to follow the guidance documents NUREG 1556 Volume 1, Revision 2 or the necessary regulations. If I don't have the form filled out completely, I can't renew your license.

From: Andrew Pilskalns [<mailto:ap.castlerock@gmail.com>]
Sent: Wednesday, September 14, 2016 3:15 PM
To: Simmons, Michelle <Michelle.Simmons@nrc.gov>
Subject: [External_Sender] RE: RE: NRC License Renewal 25-29229-01: Deficiency Letter

Michelle,

We fill out the questionnaire NRC Form 313, 5 through 11 months ago. See attached.

Sincerely,
ANDREW PILSKALNS, P.E.



1114 East Babcock
Bozeman, Montana
59715

Ph: (406)-586-9533
Cell: (406)-539-8439

ap.castlerock@gmail.com
www.castlerocker.com

SERVING; MT, ID, UT, HI, WY, CO, NV, ND

CONFIDENTIALITY NOTICE: The information contained in this email message and any attachment(s) is the **property of Castle Rock Geotechnical Engineering, Inc.** and may be **protected by state and federal laws** governing disclosure of private information. It is intended solely for the use of the entity to which this email is addressed. If you are not the intended recipient, you are hereby **notified that reading, copying or distribution of this transmission is STRICTLY PROHIBITED.** The sender has not waived any applicable privilege by sending the accompanying transmission. If you have received this transmission in error, please notify the sender by replying to this e-mail and delete the message and attachment(s) from your system.

From: Simmons, Michelle [<mailto:Michelle.Simmons@nrc.gov>]
Sent: Wednesday, September 14, 2016 1:27 PM
To: Andrew Pilskalns
Subject: RE: RE: NRC License Renewal 25-29229-01: Deficiency Letter

Thank you.

From: Andrew Pilskalns [<mailto:ap.castlerock@gmail.com>]
Sent: Wednesday, September 14, 2016 2:02 PM

To: Simmons, Michelle <Michelle.Simmons@nrc.gov>

Subject: [External_Sender] RE: NRC License Renewal 25-29229-01: Deficiency Letter

M,

We received the attachments and will send it back to you filled out.

Thank you

Sincerely,

ANDREW PILSKALNS, P.E.

CASTLE ROCK
GEOTECHNICAL ENGINEERING



1114 East Babcock
Bozeman, Montana
59715

Ph: (406)-586-9533

Cell: (406)-539-8439

ap.castlerock@gmail.com

www.castlerocker.com

SERVING: MT, ID, UT, HI, WY, CO, NV, ND

CONFIDENTIALITY NOTICE: The information contained in this email message and any attachment(s) is the **property of Castle Rock Geotechnical Engineering, Inc.** and may be **protected by state and federal laws** governing disclosure of private information. It is intended solely for the use of the entity to which this email is addressed. If you are not the intended recipient, you are hereby **notified that reading, copying or distribution of this transmission is STRICTLY PROHIBITED.** The sender has not waived any applicable privilege by sending the accompanying transmission. If you have received this transmission in error, please notify the sender by replying to this e-mail and delete the message and attachment(s) from your system.

From: Simmons, Michelle [<mailto:Michelle.Simmons@nrc.gov>]

Sent: Wednesday, September 14, 2016 7:14 AM

To: ap.castlerock@gmail.com

Subject: FW: NRC License Renewal 25-29229-01: Deficiency Letter

From: Simmons, Michelle

Sent: Monday, September 12, 2016 2:04 PM

To: 'castlerock@theglobal.net' <castlerock@theglobal.net>

Subject: FW: NRC License Renewal 25-29229-01: Deficiency Letter

From: Simmons, Michelle
Sent: Thursday, August 25, 2016 3:57 PM
To: 'andy@castlerocker.com' <andy@castlerocker.com>
Subject: NRC License Renewal 25-29229-01: Deficiency Letter

Docket No.: 03037201
License No.: 25-29229-01
Control No.: 591140

This is in reference to your renewal application dated June 14, 2016. In order to continue our review, please fill out the attached checklist and submit it to the NRC by **September 15, 2016**. Please include a cover letter with your response. Please note that all cover letters should be signed, dated, and on letterhead. You may contact me if you have any questions or concerns. You may fax your signed response to 817-200-1263, referencing mail control 591140. When you send the fax, you may wish to leave a voicemail or e-mail message to alert me to look for it. If you are submitting your response by email, the response must be submitted in pdf format. Please send me an e-mail or call me at 817-200-1590 if you have any questions.

Michelle Simmons
Health Physicist
US NRC
1600 East Lamar Blvd.
Arlington, Texas 76011
817-200-1590

**Suggested Format for Providing Information Requested in
Items 5 through 11 of
U.S. Nuclear Regulatory Commission Form 313**

Items 5 and 6: Materials To Be Possessed and Proposed Uses

Yes	No	Radionuclide	Manufacturer or Distributor Model No.	Quantity	Use as Listed on SSD Registration Certificate	Specify Other Uses Not Listed on SSD Registration Certificate
<input checked="" type="checkbox"/>		Cesium-137	Gauge manufacturer (or distributor) and model number: Troxler 3430	Specify activity per source and number of gauges requested. 8 mCi 1	Yes <input checked="" type="checkbox"/> Specific description of the gauge use: _____ _____ _____ _____ _____ _____	<input checked="" type="checkbox"/> Not applicable <input type="checkbox"/> Uses are: _____ (Submit safety analysis supporting safe use.)
<input checked="" type="checkbox"/>		Americium-241	Gauge manufacturer (or distributor) and model number: Troxler 3430	Specify activity per source and number of gauges requested. 40 mCi 1	Yes <input checked="" type="checkbox"/> Specific description of the gauge use: _____ _____ _____ _____ _____ _____	<input checked="" type="checkbox"/> Not applicable <input type="checkbox"/> Uses are: _____ (Submit safety analysis supporting safe use.)

CASTLEROCK
GEOTECHNICAL ENGINEERING



ANDY PILSKALNS, P.E.
GEOTECHNICAL ENGINEER
1114 E. Babcock Street
Bozeman, MT 59715

CELL 406.539.8439
LAND/FAX 406.586.9533
E-MAIL castlerock@the-global.net
B-1

Yes	No	Radionuclide	Manufacturer or Distributor Model No.	Quantity	Use as Listed on SSD Registration Certificate	Specify Other Uses Not Listed on SSD Registration Certificate
	<input checked="" type="checkbox"/>	Californium-252	Gauge manufacturer (or distributor) and model number	Specify activity per source and number of gauges requested	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.)
<input checked="" type="checkbox"/>		Radium-226	Gauge manufacturer (or distributor) and model number: Troxler 3430	Specify activity per source and number of gauges requested: 45 mCi 1	Yes <input checked="" type="checkbox"/> Specific description of the gauge use:	<input checked="" type="checkbox"/> Not applicable <input type="checkbox"/> Uses are: (Submit safety analysis supporting safe use.)
		Other Isotope (Specify):	Gauge manufacturer (or distributor) and model number:	Specify activity per source and number of gauges requested.	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.)

Is financial assurance required? If yes, submit evidence of financial assurance.

CASTLE ROCK
GEOTECHNICAL ENGINEERING



ANDY PILSKALMS, P.E.
GEOTECHNICAL ENGINEER
1114 E. Babcock Street
Bozeman, MT 59715

CALL 406.539.8439
LAND/FAX 406.586.9533
E-MAIL castlerock@theglobal.net

**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
7. INDIVIDUAL(S) RESPONSIBLE FOR RADIATION SAFETY PROGRAM AND THEIR TRAINING AND EXPERIENCE—RADIATION SAFETY OFFICER <i>Andrew</i> Name: <i>P. Iskalns</i>	Documentation demonstrating the proposed radiation safety officer's training and experience (e.g., certificate of completion of the RSO's course and/or the authorized user's course)	Submit <input checked="" type="checkbox"/> applicable documentation. <i>see Attachments</i>	
8. TRAINING FOR INDIVIDUALS WORKING IN OR FREQUENTING RESTRICTED AREAS	Before using licensed materials, authorized users will have successfully completed one of the training courses described in the "Criteria" part of the section titled, "Training for Individuals Working in or Frequenting Restricted Areas" in NUREG-1556, Vol. 1, Rev. 2, "Consolidated Guidance About Materials Licenses: Program-Specific Guidance About Portable Gauge Licenses."	<input checked="" type="checkbox"/>	<input type="checkbox"/>
9. FACILITIES AND EQUIPMENT	Provide a facility diagram for each permanent portable gauge storage location. Include on the diagram the use of adjacent areas (including above and below), and information relevant to public dose and security as discussed in Sections 8.10.5, "Public Dose," and 8.10.6, "Operating, Emergency, and Security Procedures," respectively, in NUREG-1556, Vol. 1, Rev. 2, "Consolidated Guidance About Materials Licenses: Program-Specific Guidance About Portable Gauge Licenses"	Submit <input checked="" type="checkbox"/> applicable documentation. <i>SEE Attachment</i>	

CASTLEROCK
GEOTECHNICAL ENGINEERING



B-3

ANDY PILSKALNS, P.E.
GEOTECHNICAL ENGINEER
1114 E. Babcock Street
Bozeman, MT 59715

CELL 406.539.8439
LAND/FAX 406.586.9533
E-MAIL castlerock@theglobal.net

Item No. and Title	Suggested Response	Yes	Alternative Procedures Attached
10.1 RADIATION SAFETY PROGRAM—AUDIT PROGRAM	The applicant should not submit its audit program to the NRC for review during the licensing phase. The audit program will be reviewed during NRC inspections.	Need Not Be Submitted with Application	
10.2 RADIATION SAFETY PROGRAM—RADIATION MONITORING INSTRUMENTS	We will either possess and use, or have access to and use, a radiation survey meter that meets the criteria in the section titled, "Radiation Safety Program—Radiation Monitoring Instruments" in NUREG-1556, Vol. 1, Rev. 2, "Consolidated Guidance About Materials Licenses: Program-Specific Guidance About Portable Gauge Licenses," in the event of an incident.	<input checked="" type="checkbox"/>	<input type="checkbox"/>
10.3 RADIATION SAFETY PROGRAM—MATERIAL RECEIPT AND ACCOUNTABILITY	Physical inventories will be conducted every 6 months or at other intervals approved by the NRC to account for all sealed sources and devices received and possessed under the license AND We will develop, implement, and maintain procedures for ensuring accountability of licensed materials at all times.	<input checked="" type="checkbox"/>	<input type="checkbox"/>
10.4 RADIATION SAFETY PROGRAM—OCCUPATIONAL DOSE	We will maintain, for inspection by the NRC, documentation demonstrating that unmonitored individuals are not likely to receive a radiation dose in excess of the limits in 10 CFR 20.1502(a). OR We will provide and require the use of individual monitoring devices (dosimetry). All personnel dosimeters that require processing to determine the radiation dose will be processed and evaluated by a NVLAP-approved processor.	<input type="checkbox"/> <input checked="" type="checkbox"/>	<input type="checkbox"/>

CASTLEROCK
GEOTECHNICAL ENGINEERING



B-4

ANDY PILSKALNS, P.E.
GEOTECHNICAL ENGINEER
1114 E. Babcock Street
Bozeman, MT 59715

CALL 406.539.8439
LAND/FAX 406.586.9533
E-MAIL castlerock@theglobal.net

Item No. and Title	Suggested Response	Yes	Alternative Procedures Attached
10.7 RADIATION SAFETY PROGRAM—LEAK TEST	<p>Leak tests will be performed at intervals approved by the NRC or an Agreement State and specified in the SSD registration certificate. Leak tests will be performed by an organization licensed by the NRC or an Agreement State to provide leak testing services to other licensees; or by using a leak test sample collection kit supplied by an organization licensed by the NRC or an Agreement State to provide leak test kits and/or sample analysis services to other licensees and according to the kit supplier's instructions. Records of leak test results will be maintained.</p> <p>OR</p> <p>We will implement the model leak test program published in Appendix I of NUREG-1556, Volume 1, Revision 2, "Consolidated Guidance About Materials Licenses. Program-Specific Guidance About Portable Gauge Licenses." Records of leak tests will be maintained.</p>	<p><input checked="" type="checkbox"/></p> <p><input type="checkbox"/></p>	<p><input type="checkbox"/> For this item, checking this box indicates that alternative equipment and/or procedures will be provided as part of the application and that records of leak tests will be maintained.</p>

CASTLEROCK
GEOTECHNICAL ENGINEERING



ANDY PILSKALNS, P.E.
GEOTECHNICAL ENGINEER
1114 E. Babcock Street
Bozeman, MT 59715

CELL 406.539.8439
LAND/FAX 406.586.9533
E-MAIL castlerock@theglobal.net

Item No. and Title	Suggested Response	Yes	Alternative Procedures Attached
10.8 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 written recommendations and instructions.	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	<i>Nonroutine Maintenance</i> The gauge manufacturer or other person licensed by the NRC or an Agreement State will perform nonroutine maintenance or repair operations that require detaching the source or source rod from the gauge.	<input type="checkbox"/>	<input type="checkbox"/> The information listed in Appendix F of this NUREG supporting a request to perform nonroutine maintenance in house is attached.
10.9 RADIATION SAFETY PROGRAM—TRANSPORTATION	The applicant is <i>not</i> required to submit a response about transportation during the licensing process. The NRC will review this issue during inspection.	Need Not Be Submitted with Application	
11. WASTE MANAGEMENT—GAUGE DISPOSAL AND TRANSFER	The applicant is <i>not</i> required to submit a response about waste management during the licensing process; however, the licensee should establish and include gauge transfer and waste disposal procedures in its radiation safety program.	Need Not Be Submitted with Application	

CASTLEROCK
GEOTECHNICAL ENGINEERING



ANDY PILSKALNS, P.E.
GEOTECHNICAL ENGINEER
1114 E. Babcock Street
Bozeman, MT 59715

CELL 406.539.8439
LAND/FAX 406.586.9533
E-MAIL castlerock@theglobal.net

CERTIFICATE OF COMPLETION



PRESENTED BY
QAL-TEK ASSOCIATES, L.L.C.

TO
ANDREW PILSKALNS

FOR HAVING SUCCESSFULLY COMPLETED THE RADIATION SAFETY OFFICER TRAINING IN
ACCORDANCE WITH THE REQUIREMENTS OF NUREG 1556 VOL 1 APPENDIX D, 10 CFR PARTS
19, 20 & 30, AND DOT HAZMAT IN 49 CFR PART 172

PRESENTED THIS

MARCH 23, 2012

Signature of Trainer

/ HAL NIELSEN Location: IDAHO FALLS, ID

CERTIFICATE OF COMPLETION



PRESENTED BY
QAL-TEK ASSOCIATES, L.L.C.
TO
ANDREW PILSKALNS

FOR HAVING SUCCESSFULLY COMPLETED THE RADIATION SAFETY AND NUCLEAR GAUGE
USER SAFETY TRAINING IN ACCORDANCE WITH THE REQUIREMENTS OF NUREG 1556 VOL 1,
10 CFR PARTS 19 & 20, AND DOT HAZMAT REQUIREMENTS IN 49 CFR PART 172.

PRESENTED THIS DAY

MARCH 22, 2012

Signature of Trainer

/ HAL NIELSEN

Location: IDAHO FALLS, ID

Castle Rock Geotechnical Engineering Inc.
U.S. Nuclear Regulatory Commission License Information

Materials License No. 25-29229-01

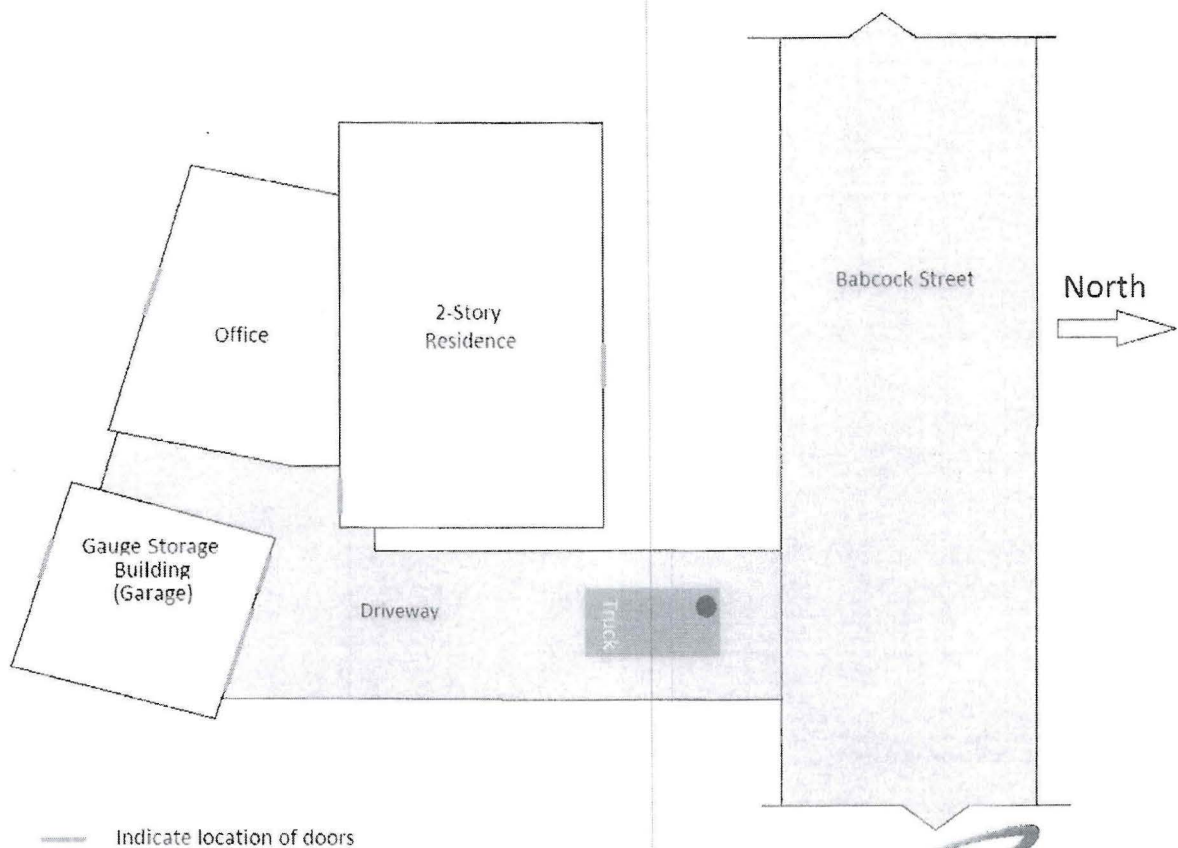
License Expiration Date: June 30, 2016

Reference Docket No. 030-37201

- 1 Troxler - 3430
Cesium 137 & Americium 241 source
Serial Number - 31485

NOTE: Troxler gauge is locked and secured in company truck.

Gauge Storage Map for 1114 East Babcock



SIGNED: _____

Date: 06.17.16



CIVIL / GEOTECHNICAL ENGINEERING
1114 East Babcock
Bozeman, Montana, 59715

office/fax: (406) - 586-9533
cell phone: (406) - 539-8439
e-mail: castlerock@theglobal.net
web site: castlerocker.com

Location: 1114 East Babcock, Bozeman, MT 59715

Date: June 17th, 2016, 5:00 PM

Company: Castle Rock Geotechnical

Personel: Andy Pilskalns - RSO Officer, President

Nuclear Gauge Storage Map

Simmons, Michelle

From: Andrew Pilskalns <ap.castlerock@gmail.com>
Sent: Wednesday, October 26, 2016 5:10 PM
To: Simmons, Michelle
Subject: [External_Sender] RE: NRC License Renewal 25-29229-01: Additional Information Needed
Attachments: Relinquishment of Ownership.PDF; NRC License Renewal, 25-29229-01.pdf

Dear Michelle,

Please find attached the Relinquishment of Ownership document of our old Troxler Gauge (3411-B) Serial Number 10312.

The Relinquishment of Ownership PDF attached contains the documentation that C & H Engineering took over possession of the two Seaman Gauges, the C-200, Serial No. A-366 and the C-300 Serial No. 21012.

Castle Rock Geotechnical has possession of only one gauge.

You will also find attached the NRC License Renewal letter you requested for more information.

Please let me know this is acceptable.

Sincerely,
ANDREW PILSKALNS, P.E.

CASTLE ROCK
GEOTECHNICAL ENGINEERING



1114 East Babcock
Bozeman, Montana
59715

Ph: (406)-586-9533
Cell: (406)-539-8439

ap.castlerock@gmail.com
www.castlerocker.com

SERVING; MT, ID, UT, HI, WY, CO, NV, ND

CONFIDENTIALITY NOTICE: The information contained in this email message and any attachment(s) is the **property of Castle Rock Geotechnical Engineering, Inc.** and may be **protected by state and federal laws** governing disclosure of private information. It is intended solely for the use of the entity to which this email is addressed. If you are not the intended recipient, you are hereby **notified that reading, copying or distribution of this transmission is STRICTLY PROHIBITED.** The sender has not waived any applicable privilege by sending the accompanying transmission. If you have received this transmission in error, please notify the sender by replying to this e-mail and delete the message and attachment(s) from your system.

From: Simmons, Michelle [mailto:Michelle.Simmons@nrc.gov]
Sent: Monday, October 24, 2016 9:07 AM
To: Andrew Pilskalns
Subject: NRC License Renewal 25-29229-01: Additional Information Needed

Docket No.: 03037201
License No.: 25-29229-01
Control No.: 591140

Mr. Pilskalns,

This is follow up to our phone conversation this morning. In order to continue our review, the following additional information is needed.

1. Please confirm that only possess one Troxler 3430 portable gauge at this time.
2. Please confirm that you have disposed of the two Seaman Radium gauges that were formerly possessed by C&H. If so, please confirm that you no longer wish to have the authorization for radium-223. Please submit the documentation detailing the disposal of the two Seaman gauges.

Please submit it to the NRC by **November 15, 2016**. Please include a cover letter with your response. Please note that all cover letters should be signed, dated, and on letterhead. You may contact me if you have any questions or concerns. You may fax your signed response to 817-200-1263, referencing mail control 591140. When you send the fax, you may wish to leave a voicemail or e-mail message to alert me to look for it. If you are submitting your response by email, the response must be submitted in pdf format. Please send me an e-mail or call me at 817-200-1590 if you have any questions.

Michelle Simmons
Health Physicist
US NRC
1600 East Lamar Blvd.
Arlington, Texas 76011
817-200-1590

**REGISTRY OF RADIOACTIVE SEALED SOURCES AND DEVICES
SAFETY EVALUATION OF DEVICE
(AMENDED PAGE 1)**

NO.: NC-646-D-130-S

DATE: April 04, 2007

PAGE: 1 of 10

DEVICE TYPE: Portable Surface Moisture and Density Gauges

MODEL No.: 3400 Series: Models 3430, 3430-M, 3430 Plus, 3440, 3440-M, 3440 Plus, 3450, 3451

MANUFACTURER/DISTRIBUTOR: Troxler Electronic Laboratories
3008 Cornwallis Road, P.O. Box 12057
Research Triangle Park, NC 27709
(919) 549-8661

<u>SEALED SOURCE MODEL DESIGNATION:</u>	<u>ISOTOPE:</u>	<u>MAXIMUM ACTIVITY:</u>
<u>Troxler Drawing No. A-102112 which covers:</u> AEA Technology/QSA, Inc. Model No. CDCW556 Capsule Type XN.30 Special Form Certificate No. USA/0673/S	Cs-137	9 millicuries (333 MBq)
 AEA Technology/QSA, Inc. Model No. CDCW556 Capsule Type X1218 Special Form Certificate No. USA/0614/S	Cs-137	9 millicuries (333 MBq)
 Isotope Product Laboratories Model # HEG-137 Capsule type: 3024 Special Form Certificate # USA/0356/S	Cs-137	9 millicuries (333 MBq)
<u>Troxler Drawing No. A-102451 which covers:</u> AEA Technology/QSA, Inc. Model # AMNV.997 Capsule type: X.1 Special Form Certificate # USA/0632/S	Am-241:Be	44 millicuries (1.63 GBq)
 Isotope Product Laboratories Model # Am1.NO2 Special Form Certificate # CZ/1009/S-85	Am-241:Be	44 millicuries (1.63 GBq)
<u>Troxler Drawing No. C-106580 which covers:</u> Isotope Product Laboratories Model Nos. 3021 or 3027 Special Form Certificate No. USA/0462/S	Am-241:Be	44 millicuries (1.63 GBq)
<u>Troxler Drawing No. A-105779 which covers:</u> Isotope Product Laboratories Model HEG-252 Capsule Type 3024 Special Form Certificate No. USA/356/S	Cf-252	66 microcuries (2.44 MBq)
 AEA Technologies Mode No. CVN.1, Capsule Type X.1 Special Form Certificate No. USA/0632/S	Cf-252	66 microcuries (2.44 MBq)

LEAK TEST FREQUENCY:

12 months

PRINCIPAL USE:

(G) Portable Moisture/Density Gauges

CUSTOM DEVICE:

YES

X NO