

Cassata, James

From: Cassata, James
Sent: Tuesday, November 07, 2017 8:18 AM
To: 'Moises Estrada'; canorobles@hotmail.com
Subject: Request for Additional Information for License Renewal; 52-31279-01; 03037552; 601490; R & F ASPHALT UNLIMITED, INC
Attachments: Pages from NUREG 1556 Vol Rev 2 PP 91 ML16175A375.pdf
Importance: High

License No.: 52-31279-01
Docket No: 03037552
Mail Control No: 601490
Licensee Name: R & F ASPHALT UNLIMITED, INC.

POC Information:
RSO: Juan Robles; 787-284-3065
Prospective RSO: Moises Estrada
CEO: Raul Robles; 787-284-3065
Fax No. 787-848-3559

Mr. Robles, Mr. Estrada,

I have been assigned to review your application for renewal of your license.

This email refers to your request for renewal of your license, letter and application dated September 13, 2017. In order to continue my review of your request, the following additional information is needed:

1. All through your application you reference NUREG-1556, Volume 1, Rev 1, dated November 2001. However the current revision released for this document is revision 2, with a publish date of June 2016. **Please review the current revision** to ensure that you can equivalently commit to the current requirements in revision 2 and **provide a statement in your reply** to the effect that all references to "NUREG-1556, Volume 1, Rev 1, dated November 2001", should be changed to "NUREG-1556, Volume 1, Rev 2, dated June 2016". **If there are any differences that need to be stated in your application then please provide all individual changes that need to be made.**
2. Regarding the list of materials to be possessed, you listed the same radionuclides and activity quantities that are on your current license in your application. However, you didn't list the source model numbers that you are using and need to provide this information. On your current license you listed a **source model number CPN-131** for CPN International portable gauges with model number CPN MC Series and you also listed a **source model number RAN-W25** for Seaman Nuclear Corporation portable gauges with Model number C-200. **Are these still the source model makes and numbers that you want to have on your renewed license? If there are other source models or portable gauge devices that you want on your license please provide the make and model numbers of the additional sources and devices.**
3. Regarding the gauge devices listed on your application, in addition to listing the Seaman Nuclear Corporation portable gauge with Model number C-200 you also listed Model number C-300. **What source make and model number(s) do you plan on using with the C-300 Seaman Nuclear Corporation portable gauge? Please list.**

4. Regarding the information you provided with respect to your Radiation Safety Officer (RSO) for your license, it is unclear who you want to assign as the current RSO. You named “Juan Robles” in block 7 of your application but provided certificates for completion of Nuclear Gauge Usage training, HAZMAT training, and Radiation Safety Officer training for Moises Estrada (Betancourt). It doesn’t explicitly state in your application that you are requesting Mr. Estrada to be written as the RSO for the license. **Please clarify who is currently acting as RSO and who you want listed on the renewed license. Please also include a current letter of Delegation of Authority** for this person (see the attached PDF file for an example).
5. Regarding the facility diagram you submitted (“Map of Location of the Nuclear Gauge Storages”) showing the permanent portable gauge storage location, **additional information is required as follows:**
 - a. What is the address of this location?
 - b. Are sources only permanently stored at this location?
 - c. In addition to the top and front views, please provide a scaled side view so that we can understand the relative depth locations of all the structures shown.
 - d. Please include on the revised diagram labels showing the use of adjacent areas so that we can determine personnel occupancy factors in these areas. Please include labels for the use of areas above, below, and around the storage area as well as the layout of the surrounding buildings including fence lines to determine 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.
6. Regarding item 10. Radiation Safety Program – Material Receipt and Accountability on your application, you stated, “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.” **Please reply back that you also agree to adding,** “We will develop, implement, and maintain procedures for ensuring accountability of licensed materials at all times.”

Your reply must be an originally signed and dated letter. The letter may be scanned and submitted as a pdf document attached to an email (preferred); or it may be transmitted by facsimile to (610) 337-5269; or it may be sent by regular mail. If we do not receive a reply from you within 30 calendar days from the date of this e-mail, we will assume that you do not wish to pursue your application for renewal.

Please respond by e-mail to acknowledge that you have received this e-mail request for additional information.

Thank you,

James R. Cassata, Ph.D., CHP
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