

From: [Lawyer, Dennis](mailto:Lawyer.Dennis)
To: scottlanders@apinde.com
Subject: APINDE Inc., Request for Additional Information Concerning Application for a New License, Control 610258
Date: Wednesday, November 07, 2018 1:03:00 PM

Dear Scott Landers,

This is in reference to your application dated October 10, 2018, requesting for amendment to Nuclear Regulatory Commission License No. 47-35507-01, Docket No. 03039133. In order to continue our review, we need the following additional information:

1. In section 8.5.2 of NUREG-1556, Volume 2, Rev. 1, "Consolidated Guidance About Materials Licenses Program-Specific Guidance About Industrial Radiography Licenses," states to provide the following statement, "Pursuant to 10 CFR 30.35(g), we shall maintain records important to decommissioning and transfer these records to an NRC or Agreement State licensee before licensed activities are transferred or assigned, in accordance with 10 CFR 30.34(b). Furthermore, pursuant to 10 CFR 30.51(f), prior to license termination, we shall forward the records required by 10 CFR 30.35(g) to the appropriate NRC regional office." This statement does not appear to be in your application. Please make this statement.
2. Based on your submittal, it is not clear that Mr. Brandt has 2,000 hours of hands on experience performing industrial radiographic operations. In particular it appears he obtained training, January 18, 2018, and obtained certification by ASNT in October 2017. It appears Mr. Brandt performs many other activities in non-destructive testing besides being a radiographer. Please provide specific dates and experience of Mr. Brandt's hands on experience of performing radiography demonstrating he has 2,000 hours of hands on experience. It is suggested you supply a copy of training certificates that he may have completed in the past to support his experience.
3. You have proposed Mr. Brandt to be your Radiation Safety Officer. Please provide the following contact information: office number, business cell number, fax number, and business email address.
4. You have requested that Benjamin T. Brandt be named Radiation Safety Officer (RSO) on your license. It appears that this individual may be an outside consultant\contractor. If this is so, in support of this request, please address the following:
 - a. Describe the control over the radiation safety program that will be delegated so that the consultant-RSO will be able to exercise authority over authorized users when confronted with radiation safety problems that require implementation of corrective actions.
 - b. Describe the relationship that will exist between the consultant-RSO and your institutional management regarding expenditure of funds to facilitate the objectives of your radiation safety program and related regulatory requirements.
 - c. Identify other commitments of the consultant-RSO for other NRC or Agreement State licensed facilities, along with a description of how the

consultant-RSO will allocate time to permit the performance of the duties of the RSO as described in the regulations. State the consultant-RSO's minimum amount of on-site time (hours per week).

- d. Appoint an in-house representative who will serve as the point of contact during the RSO's absence. This person may be allowed to assist the consultant RSO with limited authority.
 - e. Describe the overall availability of the consultant-RSO to respond to questions or operational issues that arise during the conduct of your radiation safety program and related regulatory requirements. Specify the maximum amount of time it will take the RSO to arrive at the facility in the event of an emergency that requires his presence.
5. In section 1.7.1 of the Radiation Safety Manual, you stated, "With the exception of manufacturers, a copy of each party's license must be exchanged and retained on file as evidence that the transfer was authorized." Please note that there is no exception for manufacturers for verification of the license as stated in 10 CFR 30.41(c). No response is required for this item.
 6. Section 1.9.1 of the Radiation Safety Manual states that the NRC Operations Center is 301-951-0550. Per 10 CFR 20.2203(a) it is 301-816-5100. Please correct this in your Radiation Safety Manual.
 7. Form 3-5 does not conform to current DOT regulations for shipping papers (49 CFR 172, Subpart C). The UN identification number needs to be between the RQ and the Proper Shipping Name. Please correct your form.
 8. The emergency contact number is the cell number of your Manager of Inspection. Please confirm that this number will be manned whenever shipments are in progress.
 9. The answer key for test question number 20 appears to be incorrect and should be "C." Please correct your answer sheet. Sources are leak tested every six months.
 10. Section 8.10.9.2 of NUREG-1556, Vol. 2, Rev 1, states to submit operating and emergency procedures for conducting radiation surveys in Table 8-2. It does not appear that you required a radiation survey of your storage area to not exceed 100 millirem per year at intervals not to exceed 12 months. Appendix 1-3 does not appear to demonstrate by survey or calculation that public dose is less than 100 millirem per year. Please place this requirement into your procedures.

We will continue our review upon receipt of this information. Please reply to my attention at the Region 1 Office (Address below) and refer to Mail Control No. 610258. If you have technical questions regarding this letter, please call me at (610) 337-5366.

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; 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 OR amendment request.

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

Region 1 Office Mailing Address: Licensing Assistance Team, US Nuclear Regulatory Commission Region I, 2100 Renaissance Boulevard, Suite 100, King of Prussia, PA 19406-2713.

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