

February 01, 2019

Ms. Erin Kennedy
U.S. Nuclear Regulatory Commission, Region III
Materials Licensing Branch
2443 Warrenville Road, Suite 210
Lisle, Illinois 60532

RE: NRC Amendment Request
Removal of a Permanent Storage Facility
NRC License No. 21-18663-02

Dear Ms. Kennedy:

We are submitting this letter to inform you of a proposed change in our license conditions. As you are aware, our current license was recently amended (Amendment No. 12, dated November 8, 2018) to reflect a change in location of our Cadillac, Michigan branch office: from 1202 North Mitchell Street, to 100 East Chapin Street, Suite A. We are writing to inform you that the office re-location has been completed, and we have ceased all operations relating to our former address, including the storage of radioactive materials. Accordingly, at this time, we are requesting that our license be amended to remove the **1202 North Mitchell Street, Cadillac, Michigan 49601** address as a listed permanent storage facility in Item 10 of our license.

We have reviewed your email message of January 29, 2019. In accordance with the requirements indicated therein, we have attached a listing of the various Troxler density gauges assigned to and/or stored at the North Mitchell Street location during the calendar year 2018, including gauge model, serial number and date of the most recent leak test performed. Copies of the individual leak test results are also attached to this letter.

The attached leak test documents indicate that none of the listed gauges had levels of removable contamination above 0.005 microCuries (185 Bq), which we understand to be the threshold level for a leaking gauge. Furthermore, a review of our records indicates that, to our knowledge, none of the listed gauges nor any of the 24 total gauges encompassed under the conditions of our NRC license, has ever had a positive leak test result associated with its use.

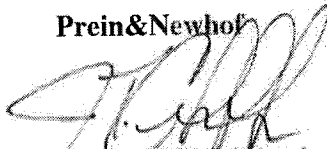
We trust that this letter and the attached information adequately satisfies NRC requirements relating to the removal of a permanent storage location from our license. As we have discussed in our recent conversations, Prein & Newhof will also soon be relocating our Kalamazoo, Michigan branch office.

Ms. Erin Kennedy
February 1, 2019
Page 2

We have already removed all radioactive materials and Troxler gauges from our current Kalamazoo location and have filed an amendment request to add the proposed new location to our license. We will submit an additional request to remove the former location within 60 days of the actual office re-location.

Sincerely,

Prein&Newhof



James T. Cruickshank, PE
Radiation Safety Officer



Christopher J. Cruickshank, PE
Corporate Secretary

Enclosures

Troxler Density Gauges

Assigned To/Stored At P&N Cadillac Office During 2018

Serial No.	Model	Most Recent Leak Test Date
0570	3450	9/05/2018
23194	3440	9/12/2018
24533	3440	9/09/2018
24534	3440	8/17/2018
31951	3440	9/12/2018
34594	3440	5/18/2018*
68550	3440	9/05/2018
70011	3440 Plus	9/14/2018
73676	3440 Plus	4/16/2018*
73677	3440 Plus	4/16/2018*

*New leak test results currently pending

InstroTek, Inc.
1 Triangle Drive, PO Box 13944
Research Triangle Park, NC 27709
(919)875-8371 Fax (919)875-8328

received G
SEP 17 2018 9/11/2018
Test Number: 1
Prein&Newhof

JAMSE CRUIKSHANK
PREIN &NEWHOF(GRAND RAPID)
3355 EVERGREEN DR.NE
GRAND RAPID, MI 49525

Phone: (616)364-8491
Fax: (616)364-6955

LEAK TEST CERTIFICATE

NC Materials License #092-1073-1

This certifies that leak test analysis was conducted on the sample with the following information. The results shown below accurately represent the level of removable contamination.

Gauge Model: 3450
Gauge S/N: 0570

Test Date: 9/5/2018

Source (Model/Serial#)	Reading in microCuries
N/A	0.00000
N/A	0.00026

Note: 0.005 microCuries (185 Bq) or greater is considered a leaking source.* The source(s) tested above may remain in use.

Reviewed by:

Date:

09/11/2018

Customer Signature:

Date:

9/20/2018

*CPN gauges are 50 mCi Am241:Be and 10 mCi Cs-137. Humboldt gauges are 40 mCi Am241:Be and 10 mCi Cs-137. InstroTek Gauge is 40 mCi Am241:Be and 10 mCi Cs-137. Troxler gauges all, except 4640, are 40 mCi Am241:Be and 8 mCi Cs-137. Troxler 4640 is 8 mCi Cs-137.

InstroTek, Inc.
1 Triangle Drive, PO Box 13944
Research Triangle Park, NC 27709
(919)875-8371 Fax (919)875-8328

9/17/2018
Test Number: 10

JOSH GOTTSCHALL
PREIN&NEWHOF(CADILAC)
100 CHAPIN STREET SUITE A
CADILAC, MI 49601

Phone: (231)468-3456
Fax: (616)364-6955

LEAK TEST CERTIFICATE

NC Materials License #092-1073-1

This certifies that leak test analysis was conducted on the sample with the following information. The results shown below accurately represent the level of removable contamination.

Gauge Model: 3440
Gauge S/N: 23194

Test Date: 9/12/2018

Source (Model/Serial#)	Reading in microCuries
47-19032	0.00000
75-5187	0.00023

Note: 0.005 microCuries (185 Bq) or greater is considered a leaking source.* The source(s) tested above may remain in use.

Reviewed by:

Date: 09/17/2018

Customer Signature:

Date: 9-24-18

*CPN gauges are 50 mCi Am241:Be and 10 mCi Cs-137. Humboldt gauges are 40 mCi Am241:Be and 10 mCi Cs-137. InstroTek Gauge is 40 mCi Am241:Be and 10 mCi Cs-137. Troxler gauges all, except 4640, are 40 mCi Am241:Be and 8 mCi Cs-137. Troxler 4640 is 8 mCi Cs-137.

InstroTek, Inc.
1 Triangle Drive, PO Box 13944
Research Triangle Park, NC 27709
(919)875-8371 Fax (919)875-8328

9/17/2018
Test Number: 10

JOSH GOTTSCHALL
PREIN&NEWHOF(CADILAC)
100 CHAPIN STREET SUITE A
CADILAC, MI 49601

Phone: (231)468-3456
Fax: (616)364-6955

LEAK TEST CERTIFICATE

NC Materials License #092-1073-1

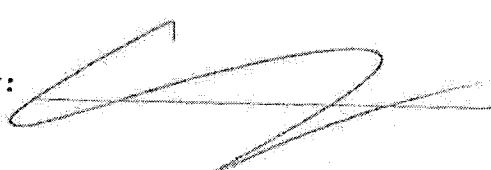
This certifies that leak test analysis was conducted on the sample with the following information. The results shown below accurately represent the level of removable contamination.

Gauge Model: 3440
Gauge S/N: 24533


Test Date: 9/9/2018

Source (Model/Serial#)	Reading in microCuries
47-20656	0.00001
75-6590	0.00022

Note: 0.005 microCuries (185 Bq) or greater is considered a leaking source.* The source(s) tested above may remain in use.

Reviewed by: 

Date: 09/17/2018

Customer Signature: 

Date: 9-24-18

*CPN gauges are 50 mCi Am241:Be and 10 mCi Cs-137. Humboldt gauges are 40 mCi Am241:Be and 10 mCi Cs-137. InstroTek Gauge is 40 mCi Am241:Be and 10 mCi Cs-137. Troxler gauges all, except 4640, are 40 mCi Am241:Be and 8 mCi Cs-137. Troxler 4640 is 8 mCi Cs-137.

InstroTek, Inc.
1 Triangle Drive, PO Box 13944
Research Triangle Park, NC 27709
(919)875-8371 Fax (919)875-8328

9/17/2018
Test Number: 10

JOSH GOTTSCHALL
PREIN&NEWHOF(CADILAC)
100 CHAPIN STREET SUITE A
CADILAC, MI 49601

Phone: (231)468-3456
Fax: (616)364-6955

LEAK TEST CERTIFICATE
NC Materials License #092-1073-1

This certifies that leak test analysis was conducted on the sample with the following information. The results shown below accurately represent the level of removable contamination.

Gauge Model: 3440
Gauge S/N: 24534

Test Date: 8/17/2018

Source (Model/Serial#)	Reading in microCuries
47-20657	0.00000
75-6591	0.00022

Note: 0.005 microCuries (185 Bq) or greater is considered a leaking source.* The source(s) tested above may remain in use.

Reviewed by:



Date:

09/17/2018

Customer Signature:



Date:

9-24-18

*CPN gauges are 50 mCi Am241:Be and 10 mCi Cs-137. Humboldt gauges are 40 mCi Am241:Be and 10 mCi Cs-137. InstroTek Gauge is 40 mCi Am241:Be and 10 mCi Cs-137. Troxler gauges all, except 4640, are 40 mCi Am241:Be and 8 mCi Cs-137. Troxler 4640 is 8 mCi Cs-137.

InstroTek, Inc.
1 Triangle Drive, PO Box 13944
Research Triangle Park, NC 27709
(919)875-8371 Fax (919)875-8328

9/17/2018
Test Number: 11

JOSH GOTTSCHALL
PREIN&NEWHOF (CADILAC)
100 CHAPIN STREET SUITE A
CADILAC, MI 49601

Phone: (231)468-3456
Fax: (616)364-6955

LEAK TEST CERTIFICATE

NC Materials License #092-1073-1

This certifies that leak test analysis was conducted on the sample with the following information. The results shown below accurately represent the level of removable contamination.

Gauge Model: 3440
Gauge S/N: 31951

Test Date: 9/12/2018

Source (Model/Serial#)	Reading in microCuries
47-4999	0.00000
750-7008	0.00019

Note: 0.005 microCuries (185 Bq) or greater is considered a leaking source.^o The source(s) tested above may remain in use.

Reviewed by:

Date: 09/17/2018

Customer Signature:

Date: 9-14-18

^oCPN gauges are 50 mCi Am241:Be and 10 mCi Cs-137. Humboldt gauges are 40 mCi Am241:Be and 10 mCi Cs-137. InstroTek Gauge is 40 mCi Am241:Be and 10 mCi Cs-137. Troxler gauges all, except 4640, are 40 mCi Am241:Be and 8 mCi Cs-137. Troxler 4640 is 8 mCi Cs-137.

InstroTek, Inc.
1 Triangle Drive, PO Box 13944
Research Triangle Park, NC 27709
(919)875-8371 Fax (919)875-8328

1/31/2019
Test Number: 8

JIM CRUICKSHANK
PREIN&NEWHOF(CADILAC)
100 CHAPIN STREET SUITE A
CADILAC, MI 49601

Phone: (231)468-3456
Fax: (616)364-6955

LEAK TEST CERTIFICATE
NC Materials License #092-1073-1

This certifies that leak test analysis was conducted on the sample with the following information. The results shown below accurately represent the level of removable contamination.

Gauge Model: 3440
Gauge S/N: 34594

Test Date: 5/18/2018

Source (Model/Serial#)	Reading in microCuries
47-20857	0.00000
77-1661	0.00020

Note: 0.005 microCuries (185 Bq) or greater is considered a leaking source.* The source(s) tested above may remain in use.

Reviewed by: Katei Deckelman

Date: 1/31/18

Customer Signature: [Signature]

Date: 1/31/2019

*CPN gauges are 50 mCi Am241:Be and 10 mCi Cs-137. Humboldt gauges are 40 mCi Am241:Be and 10 mCi Cs-137. InstroTek Gauge is 40 mCi Am241:Be and 10 mCi Cs-137. Troxler gauges all, except 4640, are 40 mCi Am241:Be and 8 mCi Cs-137. Troxler 4640 is 8 mCi Cs-137.

InstroTek, Inc.
1 Triangle Drive, PO Box 13944
Research Triangle Park, NC 27709
(919)875-8371 Fax (919)875-8328

9/11/2018
Test Number: 1

JAMSE CRUIKSHANK
PREIN & NEWHOF (GRAND RAPID)
3355 EVERGREEN DR. NE
GRAND RAPID, MI 49525

Phone: (616)364-8491
Fax: (616)364-6955

LEAK TEST CERTIFICATE

NC Materials License #092-1073-1


This certifies that leak test analysis was conducted on the sample with the following information. The results shown below accurately represent the level of removable contamination.

Gauge Model: 3440
Gauge S/N: 68550

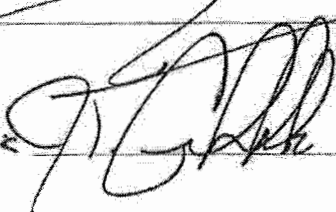
Test Date: 9/5/2018

Source (Model/Serial#)	Reading in microCuries
N/A	0.00000
N/A	0.00018

Note: 0.005 microCuries (185 Bq) or greater is considered a leaking source.° The source(s) tested above may remain in use.

Reviewed by: 

Date: 09/11/2018

Customer Signature: 

Date: 9/20/2018

°CPN gauges are 50 mCi Am241:Be and 10 mCi Cs-137. Humboldt gauges are 40 mCi Am241:Be and 10 mCi Cs-137. InstroTek Gauge is 40 mCi Am241:Be and 10 mCi Cs-137. Troxler gauges all, except 4640, are 40 mCi Am241:Be and 8 mCi Cs-137. Troxler 4640 is 8 mCi Cs-137.

InstroTek, Inc.
1 Triangle Drive, PO Box 13944
Research Triangle Park, NC 27709
(919)875-8371 Fax (919)875-8328

9/17/2018
Test Number: 6

JOSH GOTTSCHALL
PREIN&NEWHOF(CADILAC)
100 CHAPIN STREET SUITE A
CADILAC, MI 49601

Phone: (231)468-3456
Fax: (616)364-6955

LEAK TEST CERTIFICATE

NC Materials License #092-1073-1

This certifies that leak test analysis was conducted on the sample with the following information. The results shown below accurately represent the level of removable contamination.

Gauge Model: 3440 PLUS
Gauge S/N: 70011

Test Date: 9/14/2018

Source (Model/Serial#)	Reading in microCuries
78-9697	0.00000
77-14080	0.00019

Note: 0.005 microCuries (185 Bq) or greater is considered a leaking source.* The source(s) tested above may remain in use.


Reviewed by:



Date:

09/17/2018

Customer Signature:



Date:

9-24-18

*CPN gauges are 50 mCi Am241:Be and 10 mCi Cs-137. Humboldt gauges are 40 mCi Am241:Be and 10 mCi Cs-137. Instrotek Gauge is 40 mCi Am241:Be and 10 mCi Cs-137. Troxler gauges all, except 4640, are 40 mCi Am241:Be and 8 mCi Cs-137. Troxler 4640 is 8 mCi Cs-137.



Troxler Electronic Laboratories, Inc.
3008 Cornwallis Rd., P.O. Box 12057
Research Triangle Park, NC 27709
Tel: (877) 876-9537 Fax: (866) 391-2759
License: NC 032-0182-1

Cust ID: 7365

TROXLER
3008 E. CORNWALLIS RD
RTP, NC 27709

LEAK TEST CERTIFICATE

DEVICE:

Model: 3440P Serial No: 73676

SEALED SOURCES:

Serial No.	Measure Date	Nuclide	GBq	mCi
77-16429	1/3/2018	Cs-137	0.296	8
78-11698	1/22/2018	Am-241:Be	1.48	40

LEAK TEST ANALYSIS:

Sample collected on: 04/12/2018
Sample analyzed on: 4/16/2018 7:25:26 AM Position: 7
Analyzed by: STW

	ALPHA	BETA-GAMMA
Conversion factor (cpm/Bq)	1.21E+01	2.02E+01
Background measurement (cpm)	0	25
Sample measurement (cpm)	0	24
Activity (Bq)	< MDA	< MDA
Min. Detectable Activity (Bq)	4.2E-01	1.3E+00

This certifies that the leak test results are:

☒ Less than 185 Bq (0.005 uCi) ☐ Greater than 185 Bq (0.005 uCi)



Troxler Electronic Laboratories, Inc.

3008 Cornwallis Rd., P.O. Box 12057

Research Triangle Park, NC 27709

Tel: (877) 876-9537 Fax: (866) 391-2759

License: NC 032-0182-1

Cust ID: 7365

TROXLER
3008 E. CORNWALLIS RD
RTP, NC 27709

LEAK TEST CERTIFICATE

DEVICE:

Model: 3440P

Serial No: 73677

SEALED SOURCES:

Serial No.	Measure Date	Nuclide	GBq	mCi
78-11699	1/22/2018	Am-241:Be	1.48	40
77-16430	1/3/2018	Cs-137	0.296	8

LEAK TEST ANALYSIS:

Sample collected on: 04/12/2018

Sample analyzed on: 4/16/2018 7:26:40 AM

Position: 8

Analyzed by: STW

	ALPHA	BETA-GAMMA
Conversion factor (cpm/Bq)	1.21E+01	2.02E+01
Background measurement (cpm)	0	25
Sample measurement (cpm)	0	34
Activity (Bq)	< MDA	< MDA
Min. Detectable Activity (Bq)	4.2E-01	1.3E+00

This certifies that the leak test results are:

☒ Less than 185 Bq (0.005 uCi)

☐ Greater than 185 Bq (0.005 uCi)

Song, Taehoon

From: Kennedy, Erin
Sent: Friday, February 01, 2019 1:34 PM
To: Sandrik, Lauren; Pavon, Sandy; Song, Taehoon
Cc: Tomczak, Tammy
Subject: Please add the attached document to ADAMS
Attachments: ltr 2019-02-01 NRC license amendment request.pdf

Good Afternoon,

Please add the attached document and the accompanying email to ADAMS.

Prein & Newhof
LN 21-18663-02
DN 030-28571
CN610491

Thank you,
Erin Kennedy

From: Cruickshank, James T. [mailto:JCruickshank@preinnewhof.com]
Sent: Friday, February 01, 2019 1:17 PM
To: Kennedy, Erin <Erin.Kennedy@nrc.gov>
Subject: [External_Sender] RE: NRC Amendment Request

Hello Erin,

Our letter requesting the removal of the 1202 North Mitchell Street location from our license is attached. Please call if have an questions or require additional information.

Thank you very much for your attention to this matter.

From: Kennedy, Erin [mailto:Erin.Kennedy@nrc.gov]
Sent: Tuesday, January 29, 2019 11:03 AM
To: Cruickshank, James T.
Subject: NRC Amendment Request

Good Morning James,

Thank you for taking the time to discuss your amendment request with me this morning. From our phone conversation, it is my understanding that you would like to remove a permanent storage location from your license. In order to remove a location from your license, I will need the following information:

- 1) A signed and dated letter requesting to remove the location from your license. The letter needs to include:
 - a list of the gauges that have been stored at this location
 - a discussion of the historical leak test data (have you ever had a leaking gauge at the location?)

- a statement that all of the radioactive material has been removed from the location

2) An attachment of the most recent leak test results from the gauges that were stored at the location.

In order to maintain your current program code and fee category, for this particular request I will also need a commitment from you that you will remove the additional location in Kalamazoo within 60 days of moving to the new location.

I will need you to submit this request with the accompanying documentation to me no later than Friday, February 1, 2019. You can submit the request via email or you can fax it to 630-515-1078. If you have any questions please feel free to give me a call in my office.

Thank you,

Erin Kennedy

U.S. Nuclear Regulatory Commission, Region III
Health Physicist- Materials Licensing
Email: erin.kennedy@nrc.gov
Office: 630-829-9876