

U.S. Nuclear Radiation Commission
Office of Nuclear Material Safety and Safeguards
APPLICATION FOR MATERIAL LICENSE

Page 1 of 1

Additional Information Needed for Application for New NRC License

1. We would like to have authorization to possess a maximum of (8) Gauges on our license. Maximum amount which will be possessed at any one time: No single source to exceed 9 mCi:(Cs-137) Total activity not to exceed 72 millicuries. No single source to exceed 44 mCi (Am-241:Be) Total activity not to exceed 352 millicuries.
2. We will develop, implement, and maintain procedures for ensuring accountability of licensed materials at all times.
3. Copies of operating, emergency, and security procedures will be provided to all gauge users and will be available at each jobsite.
4. "Records of leak test results will be maintained."

I trust the information provided above is satisfactory. Please contact myself (651.659.7413) or randy.schlegel@element.com should you have any questions regarding this application packet.

ELEMENT MATERIALS TECHNOLOGY ST. PAUL, INC.

Kindest Regards,



Randy Schlegel
Radiation Safety Officer



Tracy Toepper
CME Department Manager

Song, Taehoon

From: Kennedy, Erin
Sent: Thursday, September 26, 2019 6:55 AM
To: Song, Taehoon; Pavon, Sandy
Cc: Tomczak, Tammy
Subject: Please add the attached document ot ADAMS
Attachments: US NRC License Application Answers 9.25.19.pdf

Follow Up Flag: Follow up
Flag Status: Flagged

Good Morning,

Please add the attached document to ADAMS:

Licensee Element Materials Technology St. Paul Inc.

Lic. No.: 22-35563-01
Doc. No.: 030-39190
CN: 613758

Thank you,

Erin

From: Randy Schlegel <randy.schlegel@element.com>
Sent: Wednesday, September 25, 2019 6:38 PM
To: Kennedy, Erin <Erin.Kennedy@nrc.gov>
Subject: [External_Sender] RE: Additional Information Needed for Application for New NRC License

Hi Erin,
Here are the answers to your questions.



Randy Schlegel
Supervisor/Project Coordinator, Construction Materials Engineer
Element Materials Technology
662 Cromwell Ave
St. Paul, MN 55114, United States
P 651 6597413
M 651 2480740
O 651 6453601 ext. 37413
randy.schlegel@element.com
www.element.com



From: Kennedy, Erin [<mailto:Erin.Kennedy@nrc.gov>]
Sent: Tuesday, September 24, 2019 12:50 PM
To: Randy Schlegel <randy.schlegel@element.com>
Subject: Additional Information Needed for Application for New NRC License

Good Afternoon Randy,

I have attempted to reach out to you several times over the last few days, but I have been unsuccessful. I have reviewed your application for your NRC materials license and I will need some additional information to complete my review. I understand that you are hoping to have your licensing action completed by October 15. I also understand that this is a busy time of year for most portable gauge users, so I wanted to reach out via email to see if we could set up a time to discuss your new license which would not impact your schedule.

I would like to discuss the following with you:

- 1) It is unclear how many gauges you would like have authorized on your license. In your application, you requested to 216 mCi of Cs-137 (24 gauges) and 968 mCi of Am-241 (22 gauges). Please provide clarification as to how many gauges you would like to have authorized on the license.
- 2) In your application you committed to completing physical inventories, however you did not provide a commitment regarding accountability of licensed material. Please provide a written statement addresses this deficiency. NUREG 1556 Vol. 1 Rev. 2 provides the following statement which may be used:

"We will develop, implement, and maintain procedures for ensuring accountability of licensed materials at all times."

- 3) In your application you committed to implementing and maintaining procedures, however you did not provide a commitment regarding the availability of the procedures at your job sites. Please provide a written statement addresses this deficiency. NUREG 1556 Vol. 1 Rev. 2 provides the following statement which may be used:

"Copies of operating, emergency, and security procedures will be provided to all gauge users and will be available at each jobsite."

- 4) In your application you committed to performing leak test of sealed sources in accordance with the SSD registration, however you did not provide a commitment regarding records retention for the leak tests. Please provide a written statement addresses this deficiency. NUREG 1556 Vol. 1 Rev. 2 provides the following statement which may be used:

"Records of leak test results will be maintained."

Please give me a call so that we can go over what documentation you will need to provide so that I can move forward with the licensing action.

Thank you,

Erin Kennedy

U.S. Nuclear Regulatory Commission, Region III

Health Physicist- Materials Licensing

Email: erin.kennedy@nrc.gov

Office: 630-829-9876