

## Cassata, James

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**From:** Cassata, James  
**Sent:** Saturday, October 05, 2019 4:38 PM  
**To:** jeff.koncki@tidewater.net  
**Cc:** DeFrancisco, Anne  
**Subject:** Request for Additional Information (RAI) - License Extension Request Dated August 27, 2019 - Mail Control 615325  
**Attachments:** 2019 10 05 Tidewater Inc List of Sources Devices Radioactivities Mail Control 615325 19-31388-01.docx  
**Importance:** High

Mail Control Number: 615325  
Docket Number: 030-38165  
License Number: 19-31388-01

Jeffrey Koncki, RSO (410-540-8700)  
Tidewater, Inc.  
6625 Selnick Drive, Suite A  
Elkridge, MD 21075

Dear Mr. Koncki,

This is in reference to your letter application August 27, 2019, requesting for the extension of Nuclear Regulatory Commission (NRC) License No. 19-31388-01 (amendment 2), Docket No 030-38165, and Mail Control Number 615325. In order to continue our review, we need the following additional information:

1. In the attached document, please verify or correct the:
  - a. Manufacturers name and model numbers for each sealed source and device;
  - b. The total radioactivity your requesting for the radionuclide listed; and
  - c. The maximum radioactivity for each individual sealed source.

This additional information is needed because our protocol on writing licenses has changed since your initial license was written. Further, I need to verify each sealed source and device have been registered in the Sealed Source and Device Registry (SSDR) and that the maximum radioactivities allowed for each sealed sources or devices are accurately listed on the license.

2. Please provide the number of gauges you desire to be licensed (currently possessed or including future consideration for a greater number) for each gauge model. Note that the number of gauges multiplied by the maximum activity allowed per gauge cannot exceed the maximum radioactivity you are requesting for that radionuclide.
3. Requests for licensing amendments, including requests for extensions, must be in the form of a letter, or on NRC Form 313, and signed and dated by a licensee certifying official that represents the licensee's management with the authority to resource the radiological safety program to fulfill regulatory requirements and the authority to appoint a Radiation Safety Officer (RSO). Your request of August 27, 2019, was in the form of a letter that was signed and dated by yourself as RSO. This is only allowed if the RSO is also a Manager/ Owner Operator or when the certifying official has provided you with a letter delegating the authority to act at the certifying official to you as the RSO. Please either have the certifying official provide you with a letter delegating you the authority to act as the certifying official or have that person sign and date the reply letter to this request for additional information.

We will continue our review upon receipt of this information. **Please reply as soon as possible but no later than 7 calendar days** from the date of this e-mail as this action must be completed by the expiration date of your license, **October 31, 2019**. **Your reply must be an originally signed and dated letter by the certifying official.** For expedience, please reply by **pdf attachment to an email** sent directly to [R1DNMSMail.Resource@nrc.gov](mailto:R1DNMSMail.Resource@nrc.gov) with [james.cassata@nrc.gov](mailto:james.cassata@nrc.gov) on the copy to line of the email. Start your body of the email with the following three lines for tracking purposes.

[R1DNMSMail.Resource@nrc.gov](mailto:R1DNMSMail.Resource@nrc.gov)

Reference – [James R. Cassata]

Mail Control No. [615325]

I encourage you to contact me prior to sending your reply to discuss the information in the tables. I may be reached at (610) 337-5303.

**Finally, please also send me a reply email me as soon as you receive this email request for additional information so that I know that you have received it. Time is of the essence for this extension approval.**

Thank you,

James R. Cassata, Ph.D., CHP

Health Physicist

Nuclear Regulatory Commission (NRC), Region I

Division of Nuclear Materials Safety (DNMS),

Commercial, Industrial, R&D, and Academic Branch (CIRDA)

Office: 610-337-5303

Fax: 610-337-5269

[james.cassata@nrc.gov](mailto:james.cassata@nrc.gov)

An electronic version of the NRC's regulations is available on the NRC Web Site at: [www.nrc.gov](http://www.nrc.gov) . Additional information regarding use of radioactive materials may be obtained on the NRC Web Site at: <http://www.nrc.gov/materials/miau/mat-toolkits.html> . This site also provides the link to the toolbox for updated information on the revised regulations for naturally-occurring and accelerator-produced radioactive materials (NARM).

In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice," a copy of this email correspondence will be available electronically for public inspection in the NRC Public Document Room or from the NRC's document system (ADAMS). ADAMS is accessible from the NRC Web Site at: <http://www.nrc.gov/reading-rm/adams.html> . Please be aware that you may request that certain portions of your submittal to NRC be withheld from public disclosure as proprietary information. To do this, you must execute an affidavit as specified in 10 CFR 2.390. You must list all portions that you wish to be held proprietary, along with your reasoning as to why that is appropriate. While it is allowable, please refrain from submitting proprietary information in support of a license unless necessary. Keep in mind that all NRC licenses are considered to be in the public domain, and therefore may be viewed by any member of the public who requests to see them.