

From: Kennedy, Erin
To: randy.schlegel@element.com
Subject: Additional Information Needed for Application for New NRC License
Date: Tuesday, September 24, 2019 12:50:00 PM

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

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

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