

**From:** Kennedy, Erin  
**To:** Mark Behrens  
**Subject:** RE: RE: Additional Information Needed for Renewal of you NRC License  
**Date:** Thursday, September 19, 2019 3:56:00 PM  
**Attachments:** [1556 Vol. 1 Rev. 2 Appendix B Form \(003\).pdf](#)  
[Delegation of Authority.docx](#)

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Good Afternoon Mr. Behrens,

I would be happy to discuss your renewal at 3:00pm tomorrow. You can give me a call in my office on my direct line at 630-829-9876.

For your convenience I have provided some Q&A's and I have attached model documents that will facilitate our discussion. I will go over these with you tomorrow so that you know exactly what I need to continue my review. Let me know if you have any questions.

#### **How do I renew my Radioactive Materials License?**

- **Complete NRC Form 313 Items 1, 2, 3, 4, and 13 and submit to the appropriate Regional Office.** As noted above, the form must be signed by a duly authorized individual. *Please note*, portable gauge licensee need to specifically request to use the portable gauge at temporary jobsites.
- **Attach Responses to NRC Form 313 Items 5 through 11 to the completed NRC Form 313.** For the convenience and streamlined handling of portable gauge applications, licensees may use Appendix B, "Suggested Format for Providing Information Requested in Items 5 through 11 of NRC Form 313," to NUREG 1556 Vol. 1, Rev. 2 to provide supporting information. I have attached a fillable PDF copy of this checklist to this email. If you choose to use this checklist please note that I will need the following information:

For Items 5 and 6 provide:

- **Each radionuclide and maximum activity of each source** per gauge model, and confirmation that the activity per source and maximum activity per gauge will not exceed the maximum activity listed in the approved certificate of registration issued by the NRC or by an Agreement State.
- **Manufacturer (or distributor) and model number** for each type of gauge.
- **Maximum number of gauges to be possessed and used under the license**, by manufacturer and model number.
- **Purpose for which the gauges will be used**, such as "to measure physical properties of materials," and confirmation that all gauges will be used as listed in accordance with the applicable and approved certificate of registration issued by the NRC or by an Agreement State.

For Items 9 provide:

- **A Facility diagram.** The diagram should be drawn to scale and include the use of adjacent areas (including above and below), and information relevant to public dose and security. Additional information regarding public dose and security is discussed in Sections 8.10.5, "Public Dose," and 8.10.6, "Operating, Emergency, and Security Procedures," to NUREG 1556, Vol. 1, Rev. 2.

For Item 10.8 *please note*: there are two checkboxes in this section, one for Routine Cleaning and Operation and one for Nonroutine Maintenance. You will need to make a selection for each.

**What information is needed to list a Radiation Safety Officer (RSO) on the license?**

- **The name and contact information** for the proposed individual, please include an email address and a direct phone number if possible.
- **Documentation demonstrating the proposed RSO's training and experience.** Acceptable training and experience is described in Appendix C, "Criteria for Acceptable Training Courses for Portable Gauge Users," to NUREG 1556 Vol. 1, Rev. 2. Please note that documented hands-on training provided by an authorized RSO should supplement any online training courses.
- **Documentation confirming that the proposed individual is duly authorized for and accepts the responsibility of being appointed as the RSO.**

This may be met by providing a copy of the *Delegation of Authority* memo formally appointing the new RSO, signed by both the new Radiation Safety Officer and their senior management responsible for oversight of the radiation safety program. A sample Delegation of Authority memo is available in Appendix D, "Typical Duties and Responsibilities of the Radiation Safety Officer," to NUREG 1556 Vol. 1, Rev. 2. For your convenience I have attached a copy of this document to this email.

Thank you so much for scheduling a meeting with me,

*Erin Kennedy*

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

**From:** Mark Behrens <[mbehrens@terrasitedev.com](mailto:mbehrens@terrasitedev.com)>  
**Sent:** Thursday, September 19, 2019 1:23 PM  
**To:** Kennedy, Erin <[Erin.Kennedy@nrc.gov](mailto:Erin.Kennedy@nrc.gov)>  
**Subject:** [External\_Sender] RE: Additional Information Needed for Renewal of you NRC License

Good Afternoon Ms. Kennedy,

Sorry for delay in response – yes crazy busy.

Can we pls talk at 3pm tomorrow eastern time?  
In the meantime can you pls send me a form so I can register or move our RSO to a new RSO within our company.  
Our previous RSO has gone into semi-retirement, but plans to retire full time soon.

Thks

**Mark Behrens**  
Principal - Geotechnical Engineering & Construction Services



**CONSULTING ENGINEERS & LAND SURVEYORS**

**direct** | 317.690.1516

**corp** | 317.399.1216

**fax** | 317.399.1216

**e** | [MBehrens@TERRAsitedev.com](mailto:MBehrens@TERRAsitedev.com) **w** | <http://www.TERRAsitedev.com>


**TERRA – North Office** | 209 East 175<sup>th</sup> Street, Suite A, Westfield, IN 46074

**Mailing Address** | 1307 W. 161st Street, Westfield, IN 46074

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**From:** Kennedy, Erin <[Erin.Kennedy@nrc.gov](mailto:Erin.Kennedy@nrc.gov)>

**Sent:** Thursday, September 19, 2019 1:15 PM

**To:** Mark Behrens <[mbehrens@terrasitedev.com](mailto:mbehrens@terrasitedev.com)>

**Subject:** Additional Information Needed for Renewal of your NRC License

Good Morning Mr. Behrens,

I have attempted to reach out to you several times this week, but I have been unsuccessful. I have reviewed your application for renewal of your NRC materials license and I will need some additional information to complete my review. I understand 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 renewal which would not impact your schedule. Please let me know what would work best for you.

Thank you,

*Erin Kennedy*

U.S. Nuclear Regulatory Commission, Region III

Health Physicist- Materials Licensing

Email: [erin.kennedy@nrc.gov](mailto:erin.kennedy@nrc.gov)

Office: 630-829-9876