



UNITED STATES  
NUCLEAR REGULATORY COMMISSION

REGION III  
2443 WARRENVILLE RD. SUITE 210  
LISLE, IL 60532-4352

NOV 21 2019

Sabah Toma  
Radiation Safety Officer  
TES Consultants, P.C.  
23943 Industrial Park  
Farmington Hills, MI 48335

Dear Ms. Toma:

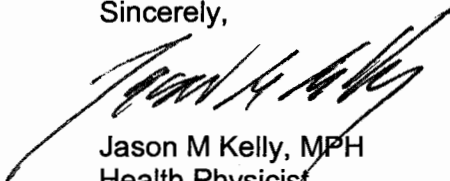
A request for additional information was sent to you on October 7, 2019, in reference to your application dated July 15, 2019 for the renewal of Radioactive Material License #21-32150-01. A copy of this request is enclosed for your reference. A response was requested by November 7, 2019. To date, your response has not been received.

To continue the review of your application for license renewal, please submit a written response to this letter by December 6, 2019. Failure to respond by this date may result in the denial of your application for license renewal in accordance with Title 10 Code of Federal Regulations §30.36(a). This would result in your license being deemed expired and would require you to place all licensed radioactive material in storage pending transfer for disposal by a specifically licensed recipient or licensed waste broker or disposal company.

To expedite the licensing process, you may fax your response to (630) 515-1078. If you have any questions or require clarification on any of the information stated above, please do not hesitate to contact me at (630) 829-9737 or [Jason.Kelly@nrc.gov](mailto:Jason.Kelly@nrc.gov).

In accordance with Title 10 of the *Code of Federal Regulations* Section 2.390 of the U.S. Nuclear Regulatory Commission's (NRC) "Rules of Practice," a copy of this letter and enclosures will be available electronically for public inspection in the NRC Public Document Room or from the NRC's Agencywide Documents Access and Management System (ADAMS), accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html>.

Sincerely,

  
Jason M Kelly, MPH  
Health Physicist  
Materials Licensing Branch

License No. 21-32150-01  
Docket No. 030-34920

Enclosure(s): As Stated



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OCT 07 2019

*Enclosure*

Sabah Toma  
Radiation Safety Officer  
TES Consultants, P.C.  
23943 Industrial Park  
Framington Hills, MI 48335

Dear Ms. Toma:

This is in reference to your application dated July 15, 2019, for the renewal of Radioactive Material License #21-32150-01. Upon review of your application, I identified the following areas requiring additional or clarifying information:

1. You are required to submit with your renewal application all appropriate supporting documentation including: Facility Diagram and Description and Radiation Protection Program. Each renewal application is evaluated independently of any previously approved radioactive materials license. Therefore, please submit a Facility Diagram and Description and your Radiation Protection Program.

The U.S. Nuclear Regulatory Commission has produced applicable licensing guidance. Please refer to NUREG-1556, Volume 1, Revision 2, "Consolidated Guidance About Materials Licenses: Program-Specific Guidance About Portable Gauge Licenses," which is accessible at: <https://www.nrc.gov/docs/ML1617/ML16175A375.pdf>. Please especially refer to the enclosed copies of Section 8, "Contents of an Application," and Appendix B, "Suggested Format for Providing Information Requested in Items 5 through 11 of the U.S. Nuclear Regulatory Commission Form 313."

2. Your license currently authorizes use of licensed material at temporary job sites. Please confirm that you would like to retain the authority to use portable gauging devices at temporary job sites.
3. The submitted Waste Management Procedure identifies that you are proposing to either store Low Level Radioactive Waste (LLRW) for decay-in-storage or for consolidation and subsequent transfer for disposal to a LLRW Disposal Site.

Your Waste Management Procedure is not acceptable because your Portable Moisture/Density Gauging Devices contain long-lived radioactive materials that are not eligible for disposal by decay-in-storage. Further, the americium-241 sealed sources contained in your Portable Moisture/Density Gauging Devices are classified as transuranic radioactive material and may not be disposed of at a LLRW Disposal Site. Though, a possible outlet for disposal of your Portable/Moisture Density Gauges is collection under Los Alamos National Laboratories' Off-Site Source Recovery Program (OSRP).

Acceptable disposal options are identified in Section 8.11, "Item 11: Waste Management—Gauge Disposal and Transfer," of the above referenced NUREG-1556, Volume 1, Revision 2. Please resubmit your Waste Management Procedure with acceptable revisions or otherwise confirm that you will develop gauge transfer and waste disposal conforming to the referenced guidance.

ML 19280 D071

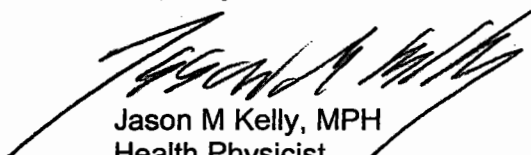
4. U.S. NRC Information Notice 96-52, "Cracked Insertion Rods on Troxler Model 3400 Series Portable Moisture Density Gauges," and SS&D Registry Sheet #NC-646-D-130-S for the Troxler Model 3400 Series Portable Surface Moisture and Density Gauges and SS&D Registry Sheet #NC-646-D-830-S for the Troxler Model 3401, 3401-B, 3411 and 3411-B Portable Surface Moisture and Density Gauges identify that the gauging devices should be returned every five years for a thorough manufacturer's inspection of the gauge, to include an extensive inspection of the extendable source rod and its pertinent welds.

Inspection of the source rod is important to ensure the detection of cracks, which might be expected to propagate over time and would then result in the complete failure and loss of control of radioactive material. This would result in a threat to public health, safety and security. As this item is only advisory, no specific response or action is needed to address this item.

To continue the review of your amendment request, please submit a written response to this letter by November 7, 2019. Your response must be dated and signed by a licensee's representative and please reference Mail Control Number 613624 in the response. To expedite the licensing process, you may fax your response to (630) 515-1078. If you have any questions or require clarification on any of the information stated above, please do not hesitate to contact me at (630) 829-9737 or [Jason.Kelly@nrc.gov](mailto:Jason.Kelly@nrc.gov).

In accordance with Title 10 of the *Code of Federal Regulations* Section 2.390 of the U.S. Nuclear Regulatory Commission's (NRC) "Rules of Practice," a copy of this letter and enclosures will be available electronically for public inspection in the NRC Public Document Room or from the NRC's Agencywide Documents Access and Management System (ADAMS), accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html>.

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