

From: [chris.genduso](#)
To: [Wardrobe, Leonardo](#)
Subject: [External_Sender] FW: Nuclear Gauges
Date: Monday, February 1, 2021 9:35:04 AM
Attachments: [Nuclear Gauge License.pdf](#)

From: chris.genduso
Sent: Tuesday, July 7, 2020 10:17 AM
To: 'daren.strickland@ct.gov' <daren.strickland@ct.gov>
Subject: Nuclear Gauges

Mr. Strickland,

On or about June 2019 Atane Consulting formerly known as HAKS Engineers, left, abandoned, or transferred, in exchange for monies owed, the entire laboratory compliment of equipment including three (3) nuclear density gauges identified as follows: one (1) Troxler ser # 16124 , two (2) Humbolt ser #'s 3073, 2529 in my possession to be maintained under NRC license (attached), initially Pavement Inspection Technologies LLC had leased two gauges from Instrotek in order to conduct business until such a time as the Atane gauges along with the balance of remaining equipment were assumed under this license as a final settlement of financial obligations which occurred on or about Sept 2019.

In order to remain in compliance with Sate of Connecticut regulations Pavement Inspection Technologies LLC has attempted to complete an online registration of regulated equipment to no avail as my user name is locked out of the system or other technical glitches regarding registration has thwarted any effort to complete registration. In cooperation with your office we are awaiting instruction and assistance which would resolve the IT issue and allow the completion of the registration.

Warmest Regards,

Chris Genduso
Pavement Inspection Technologies LLC
Engineering Inspection Technologies LLC
36 River St, Bridgeport Ct, 06604
203 572 0105 office
203 908 0036 cell



**UNITED STATES
NUCLEAR REGULATORY COMMISSION**
REGION I
2100 RENAISSANCE BLVD.
KING OF PRUSSIA, PA 19406-2713

April 30, 2019

Christopher Genduso, Manager
Pavement Inspection Technologies LLC
36 River Street
Bridgeport, CT 06604

**SUBJECT: PAVEMENT INSPECTION TECHNOLOGIES LLC, NEW LICENSE, MAIL
CONTROL NO. 611880**

Dear Mr. Genduso:

This refers to your request for an NRC license. Enclosed with this letter is your NRC License No. 06-35542-01. Please review the enclosed document carefully and be sure that you understand all conditions. If there are any errors or questions, please contact me at 610-337-5040 or via electronic mail at elizabeth.ullrich@nrc.gov so that appropriate corrections or answers can be provided.

An environmental assessment for this action is not required, since this action is categorically excluded under 10 CFR 51.22(c)(14).

Please be advised that your license expires at the end of the day in the month and year stated in the license. Until your license has been terminated, you must conduct your program in accordance with the conditions of your license, representations made in your license application, and NRC regulations. In particular, note that you must:

1. Operate in accordance with NRC regulations 10 CFR Part 19, "Notices, Instructions and Reports to Workers: Inspections and Investigations," 10 CFR Part 20, "Standards for Protection Against Radiation," and other applicable regulations.
2. Notify the NRC in writing 30 days in advance of any change in mailing address.
3. In accordance with 10 CFR 30.36(d), notify the NRC promptly, in writing, within 60 days and request termination of the license:
 - a. When you decide to terminate all activities involving materials authorized under the license;
 - b. If you decide not to acquire or possess and use authorized material; or
 - c. When no principal activities under the license have been conducted for a period of 24 months.

4. Request and obtain a license amendment before you:
 - a. Change Radiation Safety Officers;
 - b. Order byproduct material in excess of the amount, or radionuclide, or form different than authorized on the license;
 - c. Add or change the areas of use or address or addresses of use identified in the license application or on the license (except for areas of use where byproduct material is used only in accordance with either 10 CFR 35.100 or 35.200); or
 - d. Change the name or ownership of your organization.
5. Submit a complete renewal application or termination request at least 30 days before the expiration date of your license. You will receive a reminder notice approximately 60 days before the expiration date. Possession of byproduct material after your license expires is a violation of NRC regulations.

You will be periodically inspected by the NRC. Failure to conduct your program safely and in accordance with NRC regulations, license conditions, and the representations made in your license application and supplemental correspondence with NRC will result in enforcement action(s) against you. This could include issuance of a Notice of Violation, Imposition of a Civil Penalty, or an Order Suspending, Modifying or Revoking your license as specified in the NRC Enforcement Policy. The NRC Enforcement Policy is available at:
<http://www.nrc.gov/reading-rm/doc-collections/enforcement/>.

The NRC's Safety Culture Policy Statement became effective in June 2011. While a policy statement and not a regulation, it sets forth the agency's expectations for individuals and organizations to establish and maintain a positive safety culture. You can access the policy statement and supporting material that may benefit your organization on NRC's safety culture Web Site at: <http://www.nrc.gov/about-nrc/safety-culture.html>. We strongly encourage you to review this material and adapt it to your particular needs in order to develop and maintain a positive safety culture as you engage in NRC-regulated activities.

An electronic version of the NRC's regulations is available on the NRC Web Site at: 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).

Current NRC regulations and guidance are included on the NRC Web Site at www.nrc.gov; select Nuclear Materials; Med, Ind, & Academic Uses; then Licensee Toolkits, see our toolkit index page. You may also obtain these documents by contacting the Government Printing Office (GPO) toll-free at 1-866-512-1800. The GPO is open from 8:00 a.m. to 5:30 p.m. EST, Monday through Friday (except Federal holidays).

Please be aware that, as a holder of an NRC license, you may be subject to the NRC's licensing annual fee in accordance with 10 CFR Part 171. If you have any questions concerning the fee requirements, please contact the License Fee and Accounts Receivable Branch at (301) 415-7544.

In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice," a copy of this letter and its enclosures 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>.

Thank you for your cooperation.

Sincerely,

A handwritten signature in black ink, appearing to read "D. Lawyer", with a long horizontal flourish extending to the right.

Dennis R. Lawyer, Health Physicist
Commercial, Industrial, R&D
and Academic Branch
Division of Nuclear Materials Safety
Region I

License No. 06-35542-01
Docket No. 03039169
Mail Control No. 611880

Enclosures:

1. License No. 06-35542-01
2. NRC Form 3

U.S. NUCLEAR REGULATORY COMMISSION

MATERIALS LICENSE

Pursuant to the Atomic Energy Act of 1954, as amended, the Energy Reorganization Act of 1974 (Public Law 93-438), and Title 10, Code of Federal Regulations, Chapter I, Parts 30, 31, 32, 33, 34, 35, 36, 37, 39, 40, 70 and 71, and in reliance on statements and representations heretofore made by the licensee, a license is hereby issued authorizing the licensee to receive, acquire, possess, and transfer byproduct, source, and special nuclear material designated below; to use such material for the purpose(s) and at the place(s) designated below; to deliver or transfer such material to persons authorized to receive it in accordance with the regulations of the applicable Part(s). This license shall be deemed to contain the conditions specified in Section 183 of the Atomic Energy Act of 1954, as amended, and is subject to all applicable rules, regulations, and orders of the Nuclear Regulatory Commission now or hereafter in effect and to any conditions specified below.

Licensee 1. Pavement Inspection Technologies LLC 2. 36 River Street Bridgeport, CT 06604	In accordance with letter dated April 09, 2019,	4. Expiration Date: April 30, 2034
	3. License number: 06-35542-01	5. Docket No.: 030-39169 Reference No.:

6. Byproduct, source, and/or special nuclear material	7. Chemical and/or physical form	8. Maximum amount that licensee may possess at any one time under this license	9. Authorized use
A. Cesium-137	A. Sealed Sources (AEA Technology/QSA, Inc., Model CDCW556; Isotope Product Laboratories, Model HEG-137)	A. 9 millicuries per source and 36 millicuries total	A. For use in Troxler Electronic Laboratories Model 3411 and 3400 series portable gauging devices for measuring physical properties of materials.
B. Cesium-137	B. Sealed Sources (AEA Technology/QSA, Inc., Model CDC.805; Isotope Product Laboratories, Model HEG-137)	B. 11 millicuries per source and 44 millicuries total	B. For use in Humboldt Scientific, Inc. Model 5001 portable gauging devices for measuring physical properties of materials.
C. Americium-241/Beryllium	C. Sealed Neutron Source (AEA Technology/QSA, Inc., Model AMNV.997; Isotope Product Laboratories, Model Am1.NO2, 3021, or 3027)	C. 44 millicuries per source and 176 millicuries total	C. For use in Troxler Electronic Laboratories Model 3411 and 3400 series portable gauging devices for measuring physical properties of materials.

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|---|--|--|---|
| 6. Byproduct, source, and/or special nuclear material | 7. Chemical and/or physical form | 8. Maximum amount that licensee may possess at any one time under this license | 9. Authorized use |
| D. Americium-241/Beryllium | D. Sealed Neutron Source (AEA Technology/QSA, Inc., Model AMN.V997; Isotope Product Laboratories, Model Am1.NO2) | D. 44 millicuries per source and 176 millicuries total | D. For use in Humboldt Scientific, Inc. Model 5001 portable gauging devices for measuring physical properties of materials. |

CONDITIONS

10. Licensed material may be used or stored at the licensee's facilities located at: 36 River Street, Bridgeport, Connecticut. Licensed material may be used at temporary job sites anywhere in the United States where the U.S. Nuclear Regulatory Commission maintains jurisdiction for regulating the use of licensed material, including areas of exclusive Federal jurisdiction within Agreement States.

If the jurisdiction status of a Federal facility within an Agreement State is unknown, the licensee should contact the Federal agency controlling the job site in question to determine whether the proposed job site is an area of exclusive Federal jurisdiction. Authorization for use of radioactive materials at job sites in Agreement States not under exclusive Federal jurisdiction shall be obtained from the appropriate state regulatory agency.

11. Licensed material shall only be used by, or under the supervision and in the physical presence of, individuals who have received the training described in the application dated April 9, 2019. The licensee shall maintain records of individuals designated as users for 3 years following the last use of licensed material by the individual.
12. The Radiation Safety Officer (RSO) for this license is Christopher Genduso.
13. A. Sealed sources and detector cells shall be tested for leakage and/or contamination at intervals not to exceed the intervals specified in the certificate of registration issued by the U.S. Nuclear Regulatory Commission under 10 CFR 32.210 or by an Agreement State. In the absence of a registration certificate, sealed sources shall be tested for leakage and/or contamination at intervals not to exceed 6 months, or at such other intervals as specified.


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- B. In the absence of a certificate from a transferor indicating that a leak test has been made within the intervals specified in the certificate of registration issued by the U.S. Nuclear Regulatory Commission under 10 CFR 32.210 or by an Agreement State, prior to the transfer, a sealed source received from another person shall not be put into use until tested and the test results received.
- C. Sealed sources need not be tested if they are in storage and are not being used. However, when they are removed from storage for use or transferred to another person, and have not been tested within the required leak test interval, they shall be tested before use or transfer. No sealed source shall be stored for a period of more than 10 years without being tested for leakage and/or contamination.
- D. The leak test shall be capable of detecting the presence of 185 becquerels (0.005 microcuries) of radioactive material on the test sample. If the test reveals the presence of 185 becquerels (0.005 microcuries) or more of removable contamination, a report shall be filed with the U.S. Nuclear Regulatory Commission in accordance with 10 CFR 30.50(c)(2), and the source shall be removed immediately from service and decontaminated, repaired, or disposed of in accordance with Commission regulations.
- E. Analysis of leak test samples and/or contamination shall be performed by persons specifically licensed by the U.S. Nuclear Regulatory Commission or an Agreement State to perform such services. The licensee is authorized to collect leak test samples but not perform the analysis.
- F. Records of leak test results shall be kept in units of becquerels (microcuries) and shall be maintained for 3 years.
14. Sealed sources, or source rods containing licensed material shall not be opened or sources removed from source holders or detached from source rods by the licensee, except as specifically authorized.
15. The licensee shall conduct a physical inventory every 6 months, or at other intervals approved by the U.S. Nuclear Regulatory Commission, to account for all sealed sources and/or devices received and possessed under the license. Records of inventories shall be maintained for 3 years from the date of each inventory, and shall include the radionuclides, quantities, manufacturer's name and model numbers, and the date of the inventory.

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16. Each portable nuclear gauge shall have a lock or outer locked container designed to prevent unauthorized or accidental removal of the sealed source from its shielded position. The gauge or its container must be locked when in transport or storage, or when not under the direct surveillance of an authorized user.
17. Any cleaning, maintenance, or repair of the gauges that requires detaching the source or source rod from the gauge shall be performed only by the manufacturer or by other persons specifically licensed by the U.S. Nuclear Regulatory Commission or an Agreement State to perform such services.
18. Except as specifically provided otherwise in this license, the licensee shall conduct its program in accordance with the statements, representations, and procedures contained in the documents, including any enclosures, listed below. This license condition applies only to those procedures that are required to be submitted in accordance with the regulations. The U.S. Nuclear Regulatory Commission's regulations shall govern unless the statements, representations, and procedures in the licensee's application and correspondence are more restrictive than the regulations.
- A. Application dated April 9, 2019 (ML19106A079)
- B. Letter dated April 25, 2019

FOR THE U.S. NUCLEAR REGULATORY COMMISSION

Date: April 30, 2019By: 
Dennis Lawyer
Region 1