



**UNITED STATES
NUCLEAR REGULATORY COMMISSION**

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

May 27, 2021

James T. Cruickshank, P.E.
Radiation Safety Officer
Prein & Newhof
3355 Evergreen Dr., N.E.
Grand Rapids, MI 49525

Dear Mr. Cruickshank:

This letter is in reference to your request dated April 20, 2021 (ML21112A170), to amend your U.S. Nuclear Regulatory Commission (NRC) Materials License No. 21-18663-02.

The NRC's guidance document for your proposed type of license, which I refer to below as "the guidance", is NUREG-1556, Volume 1, Rev. 2, dated June 2016, "Consolidated Guidance About Materials Licenses, Program – Specific Guidance About Portable Gauge Licenses." This guidance is available on the NRC Web site at:

<https://www.nrc.gov/docs/ML1617/ML16175A375.pdf>

Upon review of your request, I identified the following area where additional or clarifying information is needed:

Your request included a facility diagram of your proposed additional permanent storage location in Kalamazoo, MI.

Please resubmit the facility diagram identifying all adjacent areas to your facility (i.e., parking lot, neighboring buildings, streets, etc.). If your facility is a multistory and/or multitenant building, identify all floors and their uses, including areas occupied by other tenants. In addition, submit greater detail on your storage area. If the gauges are stored in a cabinet or similar container, submit a diagram and description of the container. Include all information relevant to public dose and security as discussed in Sections 8.10.5, "Public Dose," and 8.10.6, "Operating, Emergency and Security Procedures," of the guidance.

As depicted in Figure 8-4, "Storing Gauges," of Section 8.10.5 of the guidance, gauges should be stored away from occupied areas. Further, Title 10 Code of Federal Regulations (10 CFR) §30.34(i) requires that portable gauges be secured against unauthorized removal using a minimum of two independent physical controls that form tangible barriers.

In accordance with 10 CFR §2.390 of the NRC's "Rules of Practice," a copy of this letter will be made 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 <https://www.nrc.gov/reading-rm/adams.html>.

To continue review of your application, please submit your response to this letter within 15 calendar days from the date of this letter. In your response, please refer to the license, docket, and control number specified below. I will assume that you do not wish to further pursue this licensing action if I do not receive a reply within the specified timeframe noted above.

If you have questions, require additional time to respond, or require clarification on any of the information stated above, I encourage you to contact me at (630) 829-9737 or via e-mail at Jason.Kelly@nrc.gov.

Sincerely,

Jason M. Kelly, MPH
Health Physicist
Materials Licensing Branch

Docket No.: 030-28571
License No.: 21-18663-02
Control No.: 625457