



**UNITED STATES
NUCLEAR REGULATORY COMMISSION**
REGION III
2443 WARRENVILLE RD. SUITE 210
LISLE, IL 60532-4352

August 6, 2021

Thomas Beuke
Radiation Safety Officer
Cochran
530A East Independence Dr.
Union, MO 63084

Dear Mr. Beuke:

This letter is in reference to your request dated July 7, 2021, for an amendment to your Materials License No. 24-32594-01.

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 letter, I identified the following areas where additional or clarifying information is needed:

1. Your request included a completed NRC Form 313, "Application for Materials License," with attached pages providing supplemental information for Items 5 - 11 of your license application.

NRC Form 313 identifies that the application should be prepared in accordance with the instructions contained in the guidance.

Your application referenced an outdated revision of NUREG-1556, Volume 1, Rev. 1, which was published in November 2001. Further, it is not apparent that all of the supplemental information provided in Items 5 – 11 are applicable to your amendment request.

Please resubmit your request using either NRC Form 313 or a letter requesting the license amendment. Please do not include supplemental information, procedures, dosimetry reports, or other attachments that are unrelated to your amendment request.

2. Section 8.3, "Address(es) where Licensed Material will be Used or Possessed," of the guidance and Item 3 of the NRC Form 313, "Application for Materials License," require that you specify the address(es) where licensed materials will be used or possessed.

Item 3 of your license application only identifies your additional proposed permanent storage site. Your licensed sites currently identified in Condition 10 of your license appear to have been inadvertently omitted from the application. Please resubmit your application, including all presently licensed locations along with the additional site that you are requesting to add to your license.

If you wish to retain authorization to use your portable gauging devices at temporary job sites, the guidance indicates that you should state, "temporary jobsites anywhere in the U.S. where the NRC maintains jurisdiction," in Item 3.

3. Section 8.9, "Facilities and Equipment," of the guidance identifies that applicants must provide a facility diagram for each permanent portable gauge storage location.

No facility diagram and description for your proposed additional permanent storage site was provided with your license amendment request.

Please submit a facility diagram identifying 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."

Identify all entrances and points of access, rooms, uses of the rooms, the location of the gauge storage area and its distance from occupied work areas. Also, describe and label all adjacent areas to your facility (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. If the gauges are stored in a cabinet or similar container, submit a diagram and/or description of the container.

Please do not submit blueprints or copies of blueprints. Simple, hand – drawn diagrams are best.

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, 10 CFR §30.34(i) requires that portable gauges must be secured against unauthorized removal using a minimum of two independent physical controls that form tangible barriers.

In accordance with Title 10 of the Code of Federal Regulations (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 request, please submit your response within 15 calendar days from the date of this letter. In your response, please refer to the license, docket, and control number specified below. If no response is received within the specified timeframe noted above, it will be assumed that you do not wish to proceed with the requested licensing action.

If you have questions, require additional time to respond, or require clarification on any of the information stated above, you may contact me at jason.kelly@nrc.gov or (630) 829-9737.

Sincerely,

Jason M. Kelly, MPH
Health Physicist
Materials Licensing Branch

License No. 24-32594-01
Docket No. 030-37025
Control No. 627301