



**UNITED STATES  
NUCLEAR REGULATORY COMMISSION**

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

April 22, 2022

Suzanne Elliott  
Radiation Safety Officer  
Hubbell, Roth & Clark, Inc.  
555 Hulet Dr.  
P.O. Box 824  
Bloomfield Hills, MI 48303-0824

SUBJECT: AMENDMENT NO. 8 TO RADIOACTIVE MATERIALS LICENSE FOR HUBBELL,  
ROTH & CLARK, INC., NRC LICENSE NO. 21-26646-01

Dear Ms. Elliott:

Enclosed is Amendment No. 8 to your U.S. Nuclear Regulatory Commission (NRC) Materials License No. 21-26646-01 in accordance with the letters dated February 11, 2022 and March 30, 2022, both signed by Marshall J. Grazioli, P.E., Associate / Radiation Safety Officer.

Congratulations on your appointment as Radiation Safety Officer. Additional information, guidance and resources are available from the agency to assist you in your role. This includes NUREG-1556, Volume 1, Rev. 2, June 2016, "Consolidated Guidance About Materials Licenses: Program-Specific Guidance About Portable Gauge Licenses," particularly including Appendix D, "Typical Duties and Responsibilities of the Radiation Safety Officer," and Appendix E, "Portable Gauge Audit Checklist." This guidance document is available on the NRC Web site at: <https://www.nrc.gov/docs/ML1617/ML16175A375.pdf>

Your license was also amended to reflect the addition of your permanent storage sites in Troy and Grand Rapids, Michigan. Following the transfer of licensed material from your permanent storage site in Bloomfield Hills, Michigan, submit a request to remove the former location from your license. Please provide the following information in support of your request:

- Submit records of transfer and/or disposal for all sealed sources or portable gauging devices previously used and/or stored at the former location. If transferred to another location in your organization, please state that and identify which portable gauging devices (including make, model and device serial number) were transferred and the date of the transfer. If transferred outside of your organization, please provide a copy of the transferee's license and a letter confirming receipt of the transferred portable gauging devices.
- Submit current Leak Test Reports for all sealed sources or portable gauging devices previously stored at the former location.
- Describe any incidents involving ruptured, leaking or lost sealed sources or portable gauging devices along with any other incidents involving radioactive materials at the former permanent storage location.

Items 6 - 9 on your license have been updated in accordance with information provided and the applicable Sealed Source and Device Registry Sheet.

The enclosed document contains sensitive security-related information.  
When separated from this cover letter this letter is uncontrolled.

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Please note that your license conditions and the format of your license has been updated to align with our Web-based Licensing System.

Condition 10 has been updated to include information regarding use of licensed material within exclusive federal jurisdictions within an Agreement State. Condition 11 has been updated to include the requirement that records be maintained for three years for individuals designated as Authorized Users. Condition 13 has been updated to include the requirement that in the absence of a registration certificate the interval for leak testing of the gauge is not to exceed six months.

Condition 15 has been updated to include the requirement that records of physical inventories must be maintained for three years after they are conducted. Condition 17 has been updated to remove the statement regarding using two physical barriers to secure the gauge as this requirement is now specified in Title 10 Code of Federal Regulations (10 CFR) §30.34(1). Condition 19, on your previous license, regarding transportation requirements has been deleted as these requirements are already specified in the regulations in 10 CFR Part 71.

Please review the enclosed document carefully and be sure that you understand all conditions. If there are any errors or questions, please notify the U.S. NRC Region III office at (630) 829-9887 so that we may provide appropriate corrections and answers.

An environmental assessment for this action is not required because this action is categorically excluded under 10 CFR §51.22(c).

You will be periodically inspected by NRC. Failure to conduct your program in accordance with NRC regulations, license conditions, and representations made in your license application and supplemental correspondence with NRC will result in enforcement action against you. This could include issuance of a notice of violation; or imposition of a civil penalty; or an Order suspending, modifying, or revoking your license as specified in the NRC Enforcement Policy. Since serious consequences to employees and the public can result from failure to comply with NRC requirements, prompt and vigorous enforcement action will be taken when dealing with licensees who do not achieve the necessary meticulous attention to detail and the high standard of compliance that NRC expects of its licensees.

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 <https://www.nrc.gov/about-nrc/regulatory/enforcement/safety-culture.html>. You are strongly encouraged 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.

NRC's Regulatory Issue Summary (RIS) RIS 2005-31 provides criteria to identify security related sensitive information and guidance for handling and marking of such documents. This ensures that potentially sensitive information is not made publicly available through NRC's

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ADAMS, the NRC's electronic document system. Pursuant to NRC's RIS 2005-31 and in accordance with 10 CFR 2.390 of the NRC's "Rules of Practice and Procedure," the enclosed license document is exempt from public disclosure because its disclosure to unauthorized individuals could present a security vulnerability. The RIS may be located on the NRC's Generic Communications Web page under "Regulatory Issue Summaries" at <https://www.nrc.gov/reading-rm/doc-collections/gen-comm/>, and the link for frequently asked questions regarding protection of security-related sensitive information may be located at <https://www.nrc.gov/reading-rm/sensitive-info/faq.html>.

A copy of this letter will be available electronically for public inspection in the NRC Public Document Room or from the NRC's ADAMS, accessible from the NRC Web site at <https://www.nrc.gov/reading-rm/adams.html>.

Sincerely,

Jason M. Kelly, MPH  
Health Physicist  
Materials Licensing Branch

Docket No.: 030-33835  
License No.: 21-26646-01

Enclosure: Amendment No. 8 to NRC License No. 21-26646-01