



Date: June 28, 2022

Mr. Jason vonEhr
Mail Control No. 631241
USNRC, Region I
Division of Radiological Safety and Security
475 Allendale Road, Suite 102
King of Prussia, PA 19406

SUBJECT: DULLES GEOTECHNICAL & MATERIALS TESTING, INC., REQUEST FOR
ADDITIONAL INFORMATION, MAIL CONTROL NO. 631241

Dear Mr. vonEhr:

This is in reference to your letter dated June 23, 2022 (NRC Letter), in which you have requested additional information regarding our application for a new NRC License dated May 14, 2022. The following is the information you have requested in your letter.

NRC Letter Item 1: Your submitted NRC Form 313 named yourself as the applicant in Box 2. Please confirm the name of the company (the “applicant”) is as it appears on the Commonwealth of Virginia license: “Dulles Geotechnical & Materials Testing, Inc.” If this is not the case, please provide additional explanation.

DGMTS Response: The name of the company is Dulles Geotechnical & Materials Testing Services, Inc.

NRC Letter Item 4(b): Regarding your application, Section 9: You provided a commitment regarding the use and maintenance of a radiation monitoring equipment (i.e. a survey meter), however it lacked a criteria for the meter itself.

DGMTS Response: We will either possess and use, or have access to and use, a radiation survey meter that meets the criteria in the section titled “Radiation Safety Program—Radiation Monitoring Instruments” in NUREG–1556, Volume 1, Revision 2.

Further, in accordance with our telephone call on June 23, 2022, we chose to provide written commitments to match that of NUREG-1556, Volume 1, Revision 2, in lieu of providing an updated copy of our Radiation Safety Program (RSP). In accordance with these decisions, we provide the following commitments:

“Operating, emergency, and security procedures will be developed, implemented, and maintained and will meet the criteria in section 8.10.6, “Radiation Safety Program—Operating,



Emergency, and Security Procedures," NUREG-1556, Volume 1, Revision 2. Copies of these procedures will be provided to all gauge users and will be available at each jobsite."

"Before using licensed materials, authorized users will have successfully completed one of the training courses described under "Criteria" in the section titled "Training for Individuals Working In or Frequenting Restricted Areas" in NUREG-1556, Vol 1, Revision 2."

"Physical inventories will be conducted every 6 months or at other intervals approved by the NRC to account for all sealed sources and devices received and possessed under the license."

"We will provide and require the use of individual monitoring devices (dosimetry). All personnel dosimeters that require processing to determine the radiation dose will be processed and evaluated by a NVLAP-approved processor."

"Leak tests will be performed at intervals approved by the NRC or an Agreement State and specified in the Sealed Source and Device registration certificate. Leak tests will be performed by an organization licensed by the NRC or an Agreement State to provide leak testing services to other licensees; or by using a leak test sample collection kit supplied by an organization licensed by the NRC or an Agreement State to provide leak test kits and/or sample analysis services to other licensees and according to the kit supplier's instructions. Records of leak test results will be maintained."

Routine cleaning and lubrication: "We will implement and maintain procedures for routine maintenance of our gauges according to each manufacturer's written recommendations and instructions"

And:

Nonroutine maintenance or repair operations that require detaching the source or source rod: "The gauge manufacturer, or other person licensed by the NRC or an Agreement State will perform nonroutine maintenance or repair operations that require detaching the source or source rod from the gauge."

Please contact the undersigned if you have any questions about the content of this letter.

Tariq B. Hamid, PhD, PE
President