



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION I
475 ALLENDALE ROAD, SUITE 102
KING OF PRUSSIA, PA 19406-1415

June 23, 2022

Tariq Hamid, President and
Radiation Safety Officer
Dulles Geotechnical & Materials Testing, Inc.
14155 Sulleyfield Circle, Suite H
Chantilly, VA 20151

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

Dear Mr. Hamid:

This is in reference to your application dated May 14, 2022, requesting a new NRC License. Several items below reference NUREG-1556, Volume 1, Revision 2, which can be found online at: <https://www.nrc.gov/reading-rm/doc-collections/nuregs/staff/sr1556/v1/index.html>. In order to continue our review, we need the following additional information:

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.
2. Please note that the Troxler Electronic Laboratories Models 3411, 3411-B, 3430, 3440, 3450, and 3450-A are all authorized with the same Sealed Source and Device Registry under the Troxler "3400 Series" and will be listed as such on your license. No response is necessary for this item.
3. Your application under Section 7 "Individuals Working in or Frequenting Restricted Areas" included two individuals named as Radiation Safety Officer (RSO). At this time, the NRC's practice is to name only one individual as the RSO on a license. In accordance with our telephone call on June 23, 2022, you confirmed you wish to be listed as the RSO on the NRC license, as you are on the Commonwealth of Virginia license. No response is necessary for this item.
4. Regarding your application, Section 9:
 - a. Please note that your facility located in Chantilly, VA, is understood by the NRC to be within the jurisdiction of the Commonwealth of Virginia, and therefore will not be included on the NRC license. No response is required unless the above-statement is incorrect and the Chantilly, VA, facility is, in fact, within NRC jurisdiction.

- b. 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. In response, please commit to the following:

"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."

5. You provided with your application a copy of your Radiation Safety Program (RSP). In the NRC's review of your application, several items of concern were identified. In accordance with our telephone call on June 23, 2022, you chose to provide written commitments to match that of NUREG-1556, Volume 1, Revision 2, in lieu of providing an updated copy of your RSP. In accordance with these decisions, please 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."*

We will continue our review upon receipt of this information. Please reply to my attention at:

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

Or

R1DRSSMail.Resource@nrc.gov

Reference – Jason vonEhr
Mail Control No. 631241

In order to continue prompt review of your application, we request that you submit your response to this letter within 30 calendar days from the date of this letter.

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).

In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice and Procedure," a copy of this letter 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>. Please be aware that you may request that certain portions of your submittal to NRC be withheld from public disclosure as proprietary information. To do this, you must execute an affidavit as specified in 10 CFR 2.390. You must list all portions that you wish to be held proprietary, along with your reasoning as to why that is appropriate. While it is allowable, please refrain from submitting proprietary information in support of a license unless necessary. Keep in mind that all NRC licenses are considered to be in the public domain, and therefore may be viewed by any member of the public who requests to see them.

If you have any questions regarding this request for additional information, please contact me at (610) 337-5256 or via electronic mail at Jason.vonEhr@nrc.gov.

Thank you for your cooperation.

Sincerely,

Jason vonEhr, Health Physicist
Commercial, Industrial, R&D
and Academic Branch
Division of Radiological Safety and Security
Region I

License No.: 45-35676-01
Docket No.: 030-39311
Mail Control No.: 631241

DULLES GEOTECHNICAL & MATERIALS TESTING, INC., REQUEST FOR ADDITIONAL
INFORMATION, MAIL CONTROL NO. 631241 DATED JUNE 23, 2022

DOCUMENT NAME: G:\WBL Documents\WBL License RAI\L45-35676-01.631241.RAI.docx

SUNSI Review Complete: JEV

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OFFICE	RI:DRSS	N					
NAME	Jason vonEhr						
DATE	06/23/2022						

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