

From: [Kelly Ausbrooks](#)
To: [Torres, Roberto](#)
Subject: [External_Sender] RE: NRC request for additional information
Date: Tuesday, July 26, 2022 8:50:00 AM
Attachments: [image001.png](#)
[ARS Additional Information - NRC License Renewal 2022 - 07262022.pdf](#)

Mr. Torres,

Thank you. Please see the attached. If there are additional questions or concerns, please reach out to me at any time. My contact information is below.

Regards,
KA



Kelly L. Ausbrooks, CHP
Director – Radiological and Analytical Services Group
Corporate Radiation Safety Officer

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From: Torres, Roberto <RobertoJ.Torres@nrc.gov>
Sent: Monday, July 25, 2022 2:41 PM
To: Kelly Ausbrooks <kelly.ausbrooks@aleutfederal.com>
Subject: NRC request for additional information

Mr. Ausbrooks:

The NRC has initiated the technical review of the renewal application package of NRC license number 17-29441-01 following the guidance of NUREG-1556, Volume 18, revision 1 (service providers) and additional information is needed. Please provide your response in a signed and dated letter (pdf format) by reply email within 1 day of receipt of this email.

1. Recordkeeping For Decommissioning - Provide the following statement: "Pursuant to

10 CFR 30.35(g), 10 CFR 40.36(f), and 10 CFR 70.25(g), and 10 CFR 70.51(b)(3), as appropriate, we will maintain drawings and records important to decommissioning and will transfer these records to an NRC or Agreement State licensee before licensed activities are transferred. Furthermore, pursuant to 10 CFR 30.51(f), 10 CFR 40.61(f), and 10 CFR 70.51(a), as appropriate, prior to license termination, we will forward the records required by 10 CFR 30.35(g), 10 CFR 40.36(f), and 10 CFR 70.25(g), as appropriate, to the appropriate NRC regional office or to assign the records to the appropriate NRC regional office before the license is terminated.”

2. Items 8.A. through 8.D. of the current NRC license number 17-29441-01 (amendment number 7) states “No possession is authorized” for byproduct material with atomic numbers 1 through 83, byproduct material with atomic numbers 84 through 103, any source material, and any special nuclear material. However, the “Use” of these licensed materials in the quantities specified in amendment number 7 are authorized at temporary job sites. Confirm that ARS International, LLC, will not take possession of the client’s radioactive material at temporary job sites. If ARS International, LLC, intends to take possession of radioactive materials from its clients then ARS will have to establish decommissioning financial assurance with the NRC following the guidance of NUREG-1757, Volume 3, revision 1.

Thank you for your cooperation.

Roberto J. Torres, M.S.
Senior Health Physicist
U.S. Nuclear Regulatory Commission, Region IV
Division of Radiological Safety and Security
1600 East Lamar Boulevard
Arlington, TX 76011-4511
817-200-1189



ARS International, LLC.

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July 26, 2022

Mr. Roberto J. Torres
Senior Health Physicist
Nuclear Materials Licensing Section
U.S. Nuclear Regulatory Commission – Region IV
1600 East Lamar Boulevard
Arlington, Texas 76011-4511

RE: Response to Request for Additional Information via Email dated July 25, 2022

ARS is in receipt of your email dated July 25, 2022 seeking additional information and responses to the following:

- 1. Provide the following statement: “Pursuant to 10 CFR 30.35(g), 10 CFR 40.36(f), and 10 CFR 70.25(g), and 10 CFR 70.51(b)(3), as appropriate, we will maintain drawings and records important to decommissioning and will transfer these records to an NRC or Agreement State licensee before licensed activities are transferred. Furthermore, pursuant to 10 CFR 30.51(f), 10 CFR 40.61(f), and 10 CFR 70.51(a), as appropriate, prior to license termination, we will forward the records required by 10 CFR 30.35(g), 10 CFR 40.36(f), and 10 CFR 70.25(g), as appropriate, to the appropriate NRC regional office or to assign the records to the appropriate NRC regional office before the license is terminated.”*
- 2. Items 8.A. through 8.D. of the current NRC license number 17-29441-01 (amendment number 7) states “No possession is authorized” for byproduct material with atomic numbers 1 through 83, byproduct material with atomic numbers 84 through 103, any source material, and any special nuclear material. However, the “Use” of these licensed materials in the quantities specified in amendment number 7 are authorized at temporary job sites. Confirm that ARS International, LLC, will not take possession of the client’s radioactive material at temporary job sites. If ARS International, LLC, intends to take possession of radioactive materials from its clients then ARS will have to establish decommissioning financial assurance with the NRC following the guidance of NUREG-1757, Volume 3, revision 1.*

ARS affirms the following:

Pursuant to 10 CFR 30.35(g), 10 CFR 40.36(f), and 10 CFR 70.25(g), and 10 CFR 70.51(b)(3), as appropriate, ARS will maintain drawings and records important to decommissioning and will transfer these records to an NRC or Agreement State licensee before licensed activities are transferred. Furthermore, pursuant to 10 CFR 30.51(f), 10 CFR 40.61(f), and 10 CFR 70.51(a), as appropriate, prior to license termination, ARS will forward the records required by 10 CFR 30.35(g), 10 CFR 40.36(f), and 10 CFR 70.25(g), as appropriate, to the appropriate NRC regional office or to assign the records to the appropriate NRC regional office before the license is terminated.

Additionally, pursuant to Question 2 provided above, ARS affirms that it will not take possession of a client’s radioactive material at temporary job sites. While it is unanticipated, should an instance arise where a client requests ARS to do so, ARS will work with USNRC to establish decommissioning financial assurance per the guidance established in NUREG-1757, Volume 3, Revision 1 prior to taking possession.



ARS International, LLC.

www.AleutFederal.com

Thank you for your support and guidance in our renewal effort. As you review our application, please don't hesitate to reach out at any time with questions, concerns, or clarifications.

Sincerely,

Kelly Ausbrooks
Director of Radiological and Analytical Services
Corporate Radiation Safety Officer
ARS International, LLC
Kelly.Ausbrooks@aleutfederal.com
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