

BURGESS ENGINEERING AND TESTING

October 18, 2022

Materials Licensing Branch
Division of Radiological Safety & Security
Region IV, USNRC

Attention: Casey Alldredge
Health Physicist

Re: Letter to NRC

Dear Ms. Alldredge:

As request, please find the below questions and answers:

Does your training program covers gauge security (as discussed in 10 CFR 30.34(i))?

Yes, we cover that there is requirement of two (2) locks on the gage and two (2) locks to connect to the truck.

Is Mr. Ebrahimi the trainer?

Yes

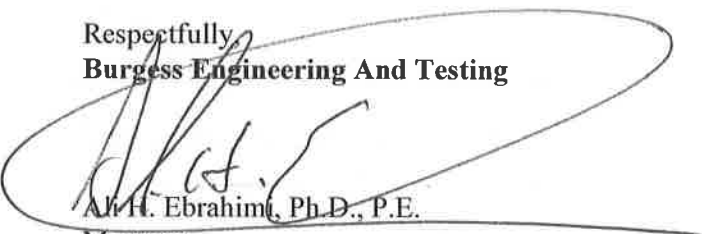
Do trainees review the correct answers to missed questions on the test?

Yes

If you any questions or require further clarifications, please do not hesitate to contact our office.

Respectfully,

Burgess Engineering And Testing



Ali H. Ebrahimi, Ph.D., P.E.

Manager

AHE/df

From: [Dustin Freeman](#)
To: [Casey Alldredge](#)
Cc: [Ali Ebrahimi](#); [Jennifer Gray](#)
Subject: [External_Sender] RE: RE: RE: Radiation Safety Paperwork
Date: Tuesday, October 18, 2022 2:30:49 PM
Attachments: [Letter to NRC.pdf](#)

Casey,

Please find the attached letter as requested.

Respectfully,

Dustin Freeman, E.I.
809 N.W. 34th Street,
Moore, Oklahoma, 73160
Phone: 405.790.0488
Fax: 405.790.0788
Email: Dustin.F@burgessengineer.com
[Burgess Engineering & Testing](#)

From: [Casey Alldredge](#)
To: [Ali Ebrahimi](#)
Cc: [Jennifer Gray](#)
Subject: RE: RE: RE: RE: Radiation Safety Paperwork
Date: Tuesday, October 18, 2022 2:18:00 PM
Attachments: [Burgess; License No. 35-27554-01; Docket No. 030-34324; Control No. 631474; Request for Info and Response 2.pdf](#)

Great! Thanks for clarifying. I just pdfed the email chain below. Could you please sign and date and email it back?

Thanks,
Casey

From: Ali Ebrahimi <ali@burgessengineer.com>
Sent: Tuesday, October 18, 2022 2:14 PM
To: Casey Alldredge <Casey.Alldredge@nrc.gov>; Jennifer Gray <jennifer.g@burgessengineer.com>
Subject: [External_Sender] RE: RE: RE: Radiation Safety Paperwork

Yes, we go over the test and missed items.

From: Casey Alldredge <Casey.Alldredge@nrc.gov>
Sent: Tuesday, October 18, 2022 2:12 PM
To: Ali Ebrahimi <ali@burgessengineer.com>; Jennifer Gray <jennifer.g@burgessengineer.com>
Subject: RE: RE: RE: Radiation Safety Paperwork

Thank you! Could you please print that response as a pdf and either sign/date it or put a digital signature/date on it? Also for question 3, am I interpreting your answer correctly to say 'yes you review the test results and missed questions with trainees?'

Appreciate it,
Casey

From: Ali Ebrahimi <ali@burgessengineer.com>
Sent: Tuesday, October 18, 2022 2:08 PM
To: Casey Alldredge <Casey.Alldredge@nrc.gov>; Jennifer Gray <jennifer.g@burgessengineer.com>
Subject: [External_Sender] RE: RE: Radiation Safety Paperwork

Ms. Alldredge:
Responses in **Red**.

Respectfully,

Ali H. Ebrahimi, Ph.D., P.E.
ali@burgessengineer.com
Burgess Engineering and Testing
809 NW 34
Moore, OK 73160
Phone: 405-790-0488

Fax: 405-790-0788

From: Casey Alldredge <Casey.Alldredge@nrc.gov>
Sent: Tuesday, October 18, 2022 1:08 PM
To: Jennifer Gray <jennifer.g@burgessengineer.com>
Cc: Ali Ebrahimi <ali@burgessengineer.com>
Subject: RE: RE: Radiation Safety Paperwork

Hi following up because I would like to issue your license this week; did you have any questions about the request for additional information below?

Thanks,

Casey Alldredge
Health Physicist
Materials Licensing Branch
Division of Radiological Safety & Security
Region IV, USNRC

From: Casey Alldredge <Casey.Alldredge@nrc.gov>
Sent: Tuesday, October 4, 2022 11:51 AM
To: Jennifer Gray <jennifer.g@burgessengineer.com>
Cc: ali@burgessengineer.com
Subject: RE: RE: Radiation Safety Paperwork

Good morning:

I have one additional follow up question for your renewal. The renewal application includes a copy of your training program, which seems to mirror Appendix D in NUREG 1556 Volume 1 Revision 1. This makes sense because that was the current revision at the time of your previous renewal. However, there is a new revision to NUREG 1556 (Revision 2) and the description of training is slightly different. I attached Appendix C from the current revision, which covers the training.

Can you please confirm the following:

1. Does your training program covers gauge security (as discussed in 10 CFR 30.34(i))? **Yes, we cover that there is requirement of two (2) locks on the gage and two locks to connect to the truck. Do you want me to send you a copy of the test**
2. Is Mr. Ebrahimi the trainer? **Yes**
3. Do trainees review the correct answers to missed questions on the test? **. we also have the meetings to discuss the safety.**

Please provide this in a signed/dated letter. You can send it as an attachment via email. Once I have this info, I can move forward to issue the renewal.

Thanks!

Casey Alldredge
Health Physicist
Materials Licensing Branch
Division of Radiological Safety & Security
Region IV, USNRC

From: Jennifer Gray <jennifer.g@burgessengineer.com>
Sent: Monday, October 3, 2022 2:06 PM
To: Casey Alldredge <Casey.Alldredge@nrc.gov>
Subject: [External_Sender] RE: Radiation Safety Paperwork

Attached, is the corrected form. Let me know if there is anything else.

From: Casey Alldredge <Casey.Alldredge@nrc.gov>
Sent: Monday, October 3, 2022 2:01 PM
To: Jennifer Gray <jennifer.g@burgessengineer.com>
Subject: RE: Radiation Safety Paperwork

Thanks for this Jennifer. On the first page, Box 10.4, both boxes are checked but it is an "OR" statement. Can you please resend the first page with the correct box checked or explain why both are checked? Also, is this Mr. Ebrahimi's signature?

Thanks!

Casey Alldredge
Health Physicist
Materials Licensing Branch
Division of Radiological Safety & Security
Region IV, USNRC

From: Jennifer Gray <jennifer.g@burgessengineer.com>
Sent: Monday, October 3, 2022 1:49 PM
To: Casey Alldredge <Casey.Alldredge@nrc.gov>
Subject: [External_Sender] Radiation Safety Paperwork

Please let us know if there is anything else we need to do, thank you.

Jennifer Gray

Burgess Engineering & Testing

809 N.W. 34th Street, Moore, Oklahoma 73160

Phone: (405) 790-0488

Fax: (405) 790-0788

From: [Casey Alldredge](#)
To: [Jennifer Gray](#)
Cc: ali@burgessengineer.com
Subject: RE: RE: Radiation Safety Paperwork
Date: Tuesday, October 4, 2022 11:50:38 AM
Attachments: [NUREG 1556 Volume 1, Revision 2 Appendix C.pdf](#)

Good morning:

I have one additional follow up question for your renewal. The renewal application includes a copy of your training program, which seems to mirror Appendix D in NUREG 1556 Volume 1 Revision 1. This makes sense because that was the current revision at the time of your previous renewal. However, there is a new revision to NUREG 1556 (Revision 2) and the description of training is slightly different. I attached Appendix C from the current revision, which covers the training.

Can you please confirm the following:

1. Does your training program covers gauge security (as discussed in 10 CFR 30.34(i))?
2. Is Mr. Ebrahimi the trainer?
3. Do trainees review the correct answers to missed questions on the test?

Please provide this in a signed/dated letter. You can send it as an attachment via email. Once I have this info, I can move forward to issue the renewal.

Thanks!

Casey Alldredge
Health Physicist
Materials Licensing Branch
Division of Radiological Safety & Security
Region IV, USNRC

From: Jennifer Gray <jennifer.g@burgessengineer.com>
Sent: Monday, October 3, 2022 2:06 PM
To: Casey Alldredge <Casey.Alldredge@nrc.gov>
Subject: [External_Sender] RE: Radiation Safety Paperwork

Attached, is the corrected form. Let me know if there is anything else.

From: Casey Alldredge <Casey.Alldredge@nrc.gov>
Sent: Monday, October 3, 2022 2:01 PM
To: Jennifer Gray <jennifer.g@burgessengineer.com>
Subject: RE: Radiation Safety Paperwork

Thanks for this Jennifer. On the first page, Box 10.4, both boxes are checked but it is an "OR" statement. Can you please resend the first page with the correct box checked or explain why both

are checked? Also, is this Mr. Ebrahimi's signature?

Thanks!

Casey Alldredge
Health Physicist
Materials Licensing Branch
Division of Radiological Safety & Security
Region IV, USNRC

From: Jennifer Gray <jennifer.g@burgessengineer.com>

Sent: Monday, October 3, 2022 1:49 PM

To: Casey Alldredge <Casey.Alldredge@nrc.gov>

Subject: [External_Sender] Radiation Safety Paperwork

Please let us know if there is anything else we need to do, thank you.

Jennifer Gray

Burgess Engineering & Testing

809 N.W. 34th Street, Moore, Oklahoma 73160

Phone: (405) 790-0488

Fax: (405) 790-0788

Criteria for Acceptable Training Courses for Portable Gauge Users

Course Content

Acceptable course content for training courses for portable gauge users includes the following:

- 1.5 to 2 hours of radiation safety and regulatory requirements, emphasizing practical subjects important to safe use of the gauge; radiation versus contamination; internal versus external exposure; concepts of time, distance, and shielding to minimize exposure; control and surveillance of gauges; location of the sealed source within the portable gauge; inventory; recordkeeping; incidents; licensing and inspection by the regulatory agency; need for complete and accurate information; employee protection; and deliberate misconduct
- 1.5 to 2 hours of practical training, to include portable gauge theory, operating procedures, emergency procedures, security, maintenance, and transportation procedures; and field training emphasizing radiation safety, including dry runs of setting up and making measurements with the gauge, controlling and maintaining surveillance over the portable gauge, performing routine cleaning and lubrication, packaging and transporting the gauge, storing the gauge, and following emergency and security procedures

Course Examination

Prospective gauge users participating in training courses should achieve at least a 70-percent score on a 25- to 50-question written test. The test should include the following:

- an emphasis on radiation safety of portable gauge storage, security of gauges while on jobsites, use, sealed source location, maintenance, and transportation, rather than the theory and art of making portable gauge measurements
- review of correct answers to missed questions with the prospective gauge user following the scoring of the test

Instructor Training and Experience

Instructors should have, at a minimum, the following:

- successful completion of a portable gauge user course
- successful completion of an 8-hour radiation safety course or radiation safety officer-training course
- documentation of 8 hours of hands-on experience with portable gauges

Notes:

- Licensees must maintain records of training for 3 years following the last use of licensed material by the authorized user.
- Initial and recurrent (every 3 years) U.S. Department of Transportation hazardous material (HAZMAT) training is also required for all gauge users that transport gauges (see Section 8.10.9, "Transportation").

Online Courses

Online training for portable gauge users is acceptable. The online training topics should follow the suggested Course Content on the previous page. Any online training should be supplemented by the practical hands-on training also described under Course Content. The applicant/licensee should demonstrate how it will meet the training described under Course Content and may consider providing a copy of the curricula covered in the course.

Online training courses should also include an examination described under Course Examination.

First Request for Additional Information
containing NUREG 1556 Vol 1, Rev 2 Checklist

From: [Jennifer Gray](#)
To: [Casey Alldredge](#)
Subject: [External_Sender] RE: Radiation Safety Paperwork
Date: Monday, October 3, 2022 2:06:07 PM
Attachments: [1.pdf](#)

Attached, is the corrected form. Let me know if there is anything else.

From: Casey Alldredge <Casey.Alldredge@nrc.gov>
Sent: Monday, October 3, 2022 2:01 PM
To: Jennifer Gray <jennifer.g@burgessengineer.com>
Subject: RE: Radiation Safety Paperwork

Thanks for this Jennifer. On the first page, Box 10.4, both boxes are checked but it is an "OR" statement. Can you please resend the first page with the correct box checked or explain why both are checked? Also, is this Mr. Ebrahimi's signature?

Thanks!

Casey Alldredge
Health Physicist
Materials Licensing Branch
Division of Radiological Safety & Security
Region IV, USNRC

From: Jennifer Gray <jennifer.g@burgessengineer.com>
Sent: Monday, October 3, 2022 1:49 PM
To: Casey Alldredge <Casey.Alldredge@nrc.gov>
Subject: [External_Sender] Radiation Safety Paperwork

Please let us know if there is anything else we need to do, thank you.

Jennifer Gray

Burgess Engineering & Testing
809 N.W. 34th Street, Moore, Oklahoma 73160
Phone: (405) 790-0488
Fax: (405) 790-0788

From: [Jennifer Gray](#)
To: [Casey Alldredge](#)
Subject: [External_Sender] RE: Radiation Safety Paperwork
Date: Monday, October 3, 2022 2:04:51 PM

Sorry about that! I will get him to correct that and I will send it back to you, and yes that is his signature.

From: Casey Alldredge <Casey.Alldredge@nrc.gov>
Sent: Monday, October 3, 2022 2:01 PM
To: Jennifer Gray <jennifer.g@burgessengineer.com>
Subject: RE: Radiation Safety Paperwork

Thanks for this Jennifer. On the first page, Box 10.4, both boxes are checked but it is an "OR" statement. Can you please resend the first page with the correct box checked or explain why both are checked? Also, is this Mr. Ebrahimi's signature?

Thanks!

Casey Alldredge
Health Physicist
Materials Licensing Branch
Division of Radiological Safety & Security
Region IV, USNRC

From: Jennifer Gray <jennifer.g@burgessengineer.com>
Sent: Monday, October 3, 2022 1:49 PM
To: Casey Alldredge <Casey.Alldredge@nrc.gov>
Subject: [External_Sender] Radiation Safety Paperwork

Please let us know if there is anything else we need to do, thank you.

Jennifer Gray

Burgess Engineering & Testing
809 N.W. 34th Street, Moore, Oklahoma 73160
Phone: (405) 790-0488
Fax: (405) 790-0788

Item No. and Title	Suggested Response	Yes	Alternative Procedures Attached
10.1 RADIATION SAFETY PROGRAM—AUDIT PROGRAM	The applicant should not submit its audit program to the NRC for review during the licensing phase. The audit program will be reviewed during NRC inspections.	Need Not Be Submitted with Application	
10.2 RADIATION SAFETY PROGRAM—RADIATION MONITORING INSTRUMENTS	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, Vol. 1, Rev. 2, "Consolidated Guidance About Materials Licenses: Program-Specific Guidance About Portable Gauge Licenses," in the event of an incident.	<input checked="" type="checkbox"/>	<input type="checkbox"/>
10.3 RADIATION SAFETY PROGRAM—MATERIAL RECEIPT AND ACCOUNTABILITY	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. AND We will develop, implement, and maintain procedures for ensuring accountability of licensed materials at all times.	<input checked="" type="checkbox"/>	<input type="checkbox"/>
10.4 RADIATION SAFETY PROGRAM—OCCUPATIONAL DOSE	We will maintain, for inspection by the NRC, documentation demonstrating that unmonitored individuals are not likely to receive a radiation dose in excess of the limits in 10 CFR 20.1502(a). OR 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.	<input type="checkbox"/> <input checked="" type="checkbox"/>	<input type="checkbox"/>

Item No. and Title	Suggested Response	Yes	Alternative Procedures Attached
10.8 RADIATION SAFETY PROGRAM—MAINTENANCE	<p><i>Routine Cleaning and Lubrication</i> We will implement and maintain procedures for routine maintenance of our gauges according to each manufacturer's written recommendations and instructions.</p> <p><i>Nonroutine Maintenance</i> 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.</p>	<input checked="" type="checkbox"/> <input checked="" type="checkbox"/>	<input type="checkbox"/> <input type="checkbox"/> The information listed in Appendix F of this NUREG supporting a request to perform nonroutine maintenance in house is attached.
10.9 RADIATION SAFETY PROGRAM—TRANSPORTATION	The applicant is <i>not</i> required to submit a response about transportation during the licensing process. The NRC will review this issue during inspection.	Need Not Be Submitted with Application	
11. WASTE MANAGEMENT—GAUGE DISPOSAL AND TRANSFER	The applicant is <i>not</i> required to submit a response about waste management during the licensing process; however, the licensee should establish and include gauge transfer and waste disposal procedures in its radiation safety program.	Need Not Be Submitted with Application	



10-3-22

**Items 7 through 11: Training and Experience,
Facilities and Equipment, Radiation Safety Program,
and Waste Disposal**

Item No. and Title	Suggested Response	Yes	Alternative Procedures Attached
7. INDIVIDUAL(S) RESPONSIBLE FOR RADIATION SAFETY PROGRAM AND THEIR TRAINING AND EXPERIENCE—RADIATION SAFETY OFFICER Name: _____	Documentation demonstrating the proposed radiation safety officer's training and experience (e.g., certificate of completion of the RSO's course and/or the authorized user's course).	Submit applicable documentation.	
8. TRAINING FOR INDIVIDUALS WORKING IN OR FREQUENTING RESTRICTED AREAS	Before using licensed materials, authorized users will have successfully completed one of the training courses described in the "Criteria" part of the section titled, "Training for Individuals Working in or Frequenting Restricted Areas" in NUREG-1556, Vol. 1, Rev. 2, "Consolidated Guidance About Materials Licenses: Program-Specific Guidance About Portable Gauge Licenses."	<input checked="" type="checkbox"/>	<input type="checkbox"/>
9. FACILITIES AND EQUIPMENT	Provide a facility diagram for each permanent portable gauge storage location. Include on the diagram the use of adjacent areas (including above and below), and 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," respectively, in NUREG-1556, Vol. 1, Rev. 2, "Consolidated Guidance About Materials Licenses: Program-Specific Guidance About Portable Gauge Licenses"	Submit applicable documentation.	

A.R.H.E.

10-3-22

From: [Casey Alldredge](#)
To: ali@burgessengineer.com
Subject: FW: Burgess NRC License Renewal; Request for Additional Information
Date: Monday, October 3, 2022 1:33:00 PM
Attachments: [Blank NUREG 1556 Checklist.pdf](#)

From: Casey Alldredge <Casey.Alldredge@nrc.gov>
Sent: Friday, September 23, 2022 2:37 PM
To: ali@burgessengineer.com
Subject: FW: Burgess NRC License Renewal; Request for Additional Information

Hi Ali,
Just following up; did you have any questions about the email I sent a few weeks ago?
Thanks,
Casey

From: Alldredge, Casey <Casey.Alldredge@nrc.gov>
Sent: Tuesday, September 6, 2022 1:55 PM
To: ali@burgessengineer.com
Subject: Burgess NRC License Renewal; Request for Additional Information

Good afternoon,
I am reviewing your NRC License Renewal Application dated, May 5, 2022, and have the following request. Could you please fill out the attached NUREG 1556 Volume 1, Revision 2 Checklist? Your application included the checklist, but an outdated Revision. Please fill out the boxes and sign and date the Checklist and email it back.
Thanks,

Casey Alldredge
Health Physicist
Materials Licensing Branch
Division of Radiological Safety & Security
Region IV, USNRC

**Items 7 through 11: Training and Experience,
Facilities and Equipment, Radiation Safety Program,
and Waste Disposal**

Item No. and Title	Suggested Response	Yes	Alternative Procedures Attached
7. INDIVIDUAL(S) RESPONSIBLE FOR RADIATION SAFETY PROGRAM AND THEIR TRAINING AND EXPERIENCE—RADIATION SAFETY OFFICER Name: _____	Documentation demonstrating the proposed radiation safety officer's training and experience (e.g., certificate of completion of the RSO's course and/or the authorized user's course).	Submit applicable documentation.	
8. TRAINING FOR INDIVIDUALS WORKING IN OR FREQUENTING RESTRICTED AREAS	Before using licensed materials, authorized users will have successfully completed one of the training courses described in the "Criteria" part of the section titled, "Training for Individuals Working in or Frequenting Restricted Areas" in NUREG-1556, Vol. 1, Rev. 2, "Consolidated Guidance About Materials Licenses: Program-Specific Guidance About Portable Gauge Licenses."	<input type="checkbox"/>	<input type="checkbox"/>
9. FACILITIES AND EQUIPMENT	Provide a facility diagram for each permanent portable gauge storage location. Include on the diagram the use of adjacent areas (including above and below), and 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," respectively, in NUREG-1556, Vol. 1, Rev. 2, "Consolidated Guidance About Materials Licenses: Program-Specific Guidance About Portable Gauge Licenses"	Submit applicable documentation.	

Item No. and Title	Suggested Response	Yes	Alternative Procedures Attached
10.1 RADIATION SAFETY PROGRAM—AUDIT PROGRAM	The applicant should not submit its audit program to the NRC for review during the licensing phase. The audit program will be reviewed during NRC inspections.	Need Not Be Submitted with Application	
10.2 RADIATION SAFETY PROGRAM—RADIATION MONITORING INSTRUMENTS	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, Vol. 1, Rev. 2, "Consolidated Guidance About Materials Licenses: Program-Specific Guidance About Portable Gauge Licenses," in the event of an incident.	<input type="checkbox"/>	<input type="checkbox"/>
10.3 RADIATION SAFETY PROGRAM—MATERIAL RECEIPT AND ACCOUNTABILITY	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. AND We will develop, implement, and maintain procedures for ensuring accountability of licensed materials at all times.	<input type="checkbox"/>	<input type="checkbox"/>
10.4 RADIATION SAFETY PROGRAM—OCCUPATIONAL DOSE	We will maintain, for inspection by the NRC, documentation demonstrating that unmonitored individuals are not likely to receive a radiation dose in excess of the limits in 10 CFR 20.1502(a). OR 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.	<input type="checkbox"/> <input type="checkbox"/>	<input type="checkbox"/>

Item No. and Title	Suggested Response	Yes	Alternative Procedures Attached
10.5 RADIATION SAFETY PROGRAM—PUBLIC DOSE	The applicant is <i>not</i> required to submit a response to the public dose section in a license application. This matter will be examined during NRC inspections.	Need Not Be Submitted with Application	
10.6 RADIATION SAFETY PROGRAM—OPERATING, EMERGENCY, AND SECURITY PROCEDURES	<p>We will implement and maintain the operating, emergency, and security procedures in Appendix G to NUREG–1556, Vol. 1, Rev. 2, "Consolidated Guidance About Materials Licenses: Program-Specific Guidance About Portable Gauge Licenses." Copies of these procedures will be provided to all gauge users and will be available at each jobsite.</p> <p style="text-align: center;">OR</p> <p>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, Vol. 1, Rev. 2, "Consolidated Guidance About Materials Licenses: Program-Specific Guidance About Portable Gauge Licenses." Copies of these procedures will be provided to all gauge users and will be available at each jobsite.</p>	<div data-bbox="1127 501 1148 522" type="checkbox"></div> <div data-bbox="1127 926 1148 949" type="checkbox"></div>	<div data-bbox="1266 501 1417 1236" type="Text"> <p><input type="checkbox"/> For this item, checking this box indicates that alternative procedures will be provided as part of the application and that these procedures will be provided to all gauge users and will be available at each jobsite.</p> </div>

Item No. and Title	Suggested Response	Yes	Alternative Procedures Attached
10.7 RADIATION SAFETY PROGRAM—LEAK TEST	<p>Leak tests will be performed at intervals approved by the NRC or an Agreement State and specified in the SSD 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.</p> <p>OR</p> <p>We will implement the model leak test program published in Appendix I of NUREG-1556, Volume 1, Revision 2, "Consolidated Guidance About Materials Licenses: Program-Specific Guidance About Portable Gauge Licenses." Records of leak tests will be maintained.</p>	<p><input type="checkbox"/></p> <p><input type="checkbox"/></p>	<p><input type="checkbox"/> For this item, checking this box indicates that alternative equipment and/or procedures will be provided as part of the application and that records of leak tests will be maintained.</p>

