



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

December 22, 2022

Timothy H. Evans, Project Manager
Coal-Mac, LLC
P. O. box 1050
22 Mine Road
Holden, WB 25625

SUBJECT: COAL-MAC, LLC, REQUEST FOR ADDITIONAL INFORMATION, MAIL
CONTROL NO. 632250

Dear Mr. Evans:

This is in reference to your letter dated July 26, 2022, requesting to renew NRC License No. 47-25599-01. In order to continue our review, we need the following additional information:

1. In accordance with NUREG-1556, Volume 4, Revision 1 "Program-Specific Guidance About Fixed Gauge Licenses." (NUREG-1556, Vol. 4, Rev. 1) Section 8.7.2, "Authorized Users," state "Before using licensed materials, authorized users will have successfully completed one of the training courses described in the "Criteria" part of the section titled "Authorized Users" in NUREG-1556, Vol. 4, Rev. 1."
2. In accordance with NUREG-1556, Vol. 4, Rev. 1, Section 8.10.2, "Radiation Monitoring Instruments," state "Surveys according to 10 CFR 20.1501 will be performed by a person specifically authorized by the NRC or an Agreement State to perform these surveys." Or you may submit one of the alternate means of performing surveys described in Section 8.10.2.
3. In accordance with NUREG -1556, Vol. 4, Rev. 1, Section 8.10.3, "Material Receipt and Accountability," state "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."
4. In accordance with NUREG-1556, Vol. 4, Rev. 1, Section 8.10.4, "Occupational Dose" state either that
 - a. "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 state
 - b. "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."

5. In accordance with NUREG-1556, Col. 4, Rev. 1, Section 8.10.6, "Operating, Emergency, and Security Procedures," provide ONE of the following:
 - a. If the gauges meet one or more of the safety conditions specific in the "Discussion" portion of this section, state "Operating, emergency and security procedures will be developed, implemented, maintained and distributed and will meet the criteria in Section 8.10.6 of NUREG-156, Vol. 4, Rev. a." ;
OR
 - b. If the gauges do not meet any of the safety conditions specified in the "Discussion" portion of Section 8.10.6, provide your operating, emergency, security, and lock-out procedures.
6. In accordance with NUREG-1556 Vol. 4, Rev. 1, Section 8.10.7, "Leak Tests," state "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." Alternately, provide one of the other means of performing leak tests as stated in Section 8.10.7.
7. In accordance with NUREG-1556, Vol. 4, Rev. 1, Section 8.10.8, "Maintenance,"
 - a. For routine maintenance, either state "We will implement and maintain procedures for routine maintenance of our gauges according to each manufacturer's or distributor's written recommendations and instructions." Or provide alternate procedures for NRC review.
AND
 - b. For non-routine operations, either state "The gauge manufacturer, distributor, or other person licensed by the NRC or an Agreement State will perform nonroutine operations such as installation, initial radiation survey, repair and maintenance of radiological safety components, relocation, replacement, alignment, removal from services, and disposal of sealed sources." OR request the work that you wish to perform and use the information in Appendix J to support the request.

We will continue our review upon receipt of this information. A pdf of an originally signed letter may be provided attached to an email sent to Elizabeth.Ullrich@nrc.gov . Alternately, a hard copy response may be provided by regular mail to:

Attn: Betsy Ullrich
Mail Control No. 632250
USNRC, Region I
Division of Radiological Safety and Security
475 Allendale Road – Suite 102
King of Prussia, PA 19406

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 "Agency 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 240-704-4575 or by electronic mail to Elizabeth.Ullrich@nrc.gov.

Thank you for your cooperation.

Sincerely,

Betsy Ullrich, Senior Health Physicist
Commercial, Industrial, R&D
and Academic Branch
Division of Radiological Safety and Security
Region I

License No. 47-25599-01
Docket No. 030-36047
Mail Control No. 632250

cc: Doug Boyd, Radiation Safety Officer

COAL-MAC, LLC, REQUEST FOR ADDITIONAL INFORMATION, MAIL CONTROL NO.
632250 DATED DECEMBER 28, 2022

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SUNSI Review Complete: Betsy Ullrich

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NAME	Betsy Ullrich						
DATE	12/28/22 exu						

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