



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION III
2443 WARRENVILLE ROAD, SUITE 210
LISLE, ILLINOIS 60532-4352

January 2, 2023

Christopher M. Wire
Corporate Radiation Safety Officer
Great Lakes Dredge & Dock Company, LLC
10151 Deerwood Park Blvd
Bldg. 300, Suite 115
Jacksonville, FL 32256

Dear Mr. Wire:

Enclosed is Amendment No. 16 renewing your NRC Material License No. 12-20175-01 in accordance with your request. Your license has been renewed for a fifteen-year term and will not expire until January 31, 2038.

Please review the enclosed document carefully and be sure that you understand all conditions. If there are any errors or questions, please notify the U.S. Nuclear Regulatory Commission, Region III office at (630) 829-9887 so that we can provide appropriate corrections and answers.

If you have any further questions concerning this amendment, please contact me at (630) 829-9841 and my fax number is (630) 515-1078. My email address is colleen.casey@nrc.gov.

At this time, we deleted Condition No. 23, as it appeared on Amendment No. 15, because the requirements in 10 CFR 20.1901 supersede it.

We noted the following remaining minor issues with your renewal request:

1. We were unable to approve the increase in "per source" and "total activity" possession limits for materials in Subitem Nos. 6 – 9.E., as requested in your application dated April 29, 2022, because the certificate for this source in the Sealed Source and Device Registry (SSDR) failed to support the increase, especially for the "per source" request.

If you wish to pursue this matter, please provide appropriate SSDR information to support the "per source" increase. Further instructions on how to respond to this are below.

2. We noted that the inventory provided in your application dated April 29, 2022, showed greater "per source" activity than what was allowed by your license, as it appeared on Amendment No. 15, Subitem No. 8.D. Although the SSDR permitted the higher activity, your license did not authorize the higher activity until today with the issuance of this amendment.

The enclosed document contains sensitive security-related information.
When separated from this cover letter this letter is uncontrolled.

Please explain this discrepancy and advise us as to how you obtained this source from the vendor.

3. Please provide a currently dated and signed "Delegation of Authority" for yourself as the Radiation Safety Officer, using the sample form in NUREG 1556, Vol. 4, Rev.1, Appendix C.
4. Also in NUREG 1556, Vol. 4, Rev.1, please submit:
 - (a) Commitments for "Material Receipt and Accountability," in Item 10.3; and,
 - (b) Commitments for "Operating, Emergency, and Security Procedures", in Item 10.6.

Your application only committed to performing "visual" inventory checks and it appeared that your "Operating, Emergency, and Security Procedures" were incompletely committed to and described. Please refer to Sections 8.10.3 and 8.10.6 in the NUREG 1556 Vol. 4, Rev. 1 in preparing your response.

5. On page 2 of your application dated April 29, 2022, in the "Radiation Safety Officer" section, your state "The Nuclear Regulatory Commission, and States in which Great Lakes Dredge & Dock Company, LLC has a license or reciprocity agreement, must be notified, in writing, within 30 days when there is a change of Radiation Safety Officers."

This is incorrect. Please see the "Note" at the bottom of page 8-9 under Section 8.7, Item 8.7.1, in the NUREG 1556 Vol. 4, Rev. 1, which states "Licensees must notify the NRC and obtain a license amendment before making changes in the designation of the RSO responsible for the radiation safety program."

Section 9 in this NUREG expands on licensee's obligations further, please refer to it also. This NUREG is located on our website at: chrome-extension://efaidnbmnnnibpcajpcgiclfindmkaj/https://www.nrc.gov/docs/ML1618/ML16188A048.pdf.

6. We noted that your application referenced the original version NUREG 1556 Vol. 4 from 1998 in some areas and it referenced the current version of NUREG 1556 Vol. 4, Rev.1 from 2016. There are differences between the two versions. Please always use the most current version of our guidance when preparing licensing correspondence.

As we approved your renewal prior to resolving the few "loose ends" described above, please submit one, currently dated and signed (by a senior management representative) written response, addressed to my attention, referencing it as "additional information to control number 631740."

Only send us one copy by one means of transmission only. If you wish to transmit your response via email, please send it to R3-DRSSMail.Resource@nrc.gov and your may "cc" me on that too. Please submit this response within 30 days of the date of this letter, by close of

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C. Wire

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business on February 3, 2023. If additional time is needed, please email me to make alternative arrangements.

NRC's Regulatory Issue Summary (RIS) 2005-31 provides criteria to identify security-related sensitive information and guidance for handling and marking of such documents. This ensures that potentially sensitive information is not made publicly available through ADAMS, the NRC's electronic document system.

Pursuant to NRC's RIS 2005-31 and in accordance with 10 Code of Federal Regulations 2.390, the enclosed license document is exempt from public disclosure because its disclosure to unauthorized individuals could present a security vulnerability.

The RIS may be located on the NRC Web site at: <http://www.nrc.gov/reading-rm/doc-collections/gen-comm/reg-issues/2005/ri200531.pdf> and the link for frequently asked questions regarding protection of security related sensitive information may be located at: <http://www.nrc.gov/reading-rm/sensitive-info/faq.html>.

A copy of this letter will be available electronically for public inspection in the NRC Public Document Room or from the NRC's Agencywide Documents Access and Management System (ADAMS), accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html>. You will be periodically inspected by NRC.

Failure to conduct your program in accordance with NRC regulations, license conditions, and representations made in your license application and supplemental correspondence with NRC will result in enforcement action against you.

This could include issuance of a notice of violation, or imposition of a civil penalty, or an order suspending, modifying or revoking your license as specified in the General Statement of Policy and Procedure for NRC Enforcement Actions.

Since serious consequences to employees and the public can result from failure to comply with NRC requirements, prompt and vigorous enforcement action will be taken when dealing with licensees who do not achieve the necessary meticulous attention to detail and the high standard of compliance which NRC expects of its licensees.

The NRC's Safety Culture Policy Statement became effective in June 2011. While a policy statement and not a regulation, it sets forth the agency's *expectations* for individuals and organizations to establish and maintain a positive safety culture.

You can access the policy statement and supporting material that may benefit your organization on NRC's safety culture Web site at <http://www.nrc.gov/about-nrc/regulatory/enforcement/safety-culture.html>.

[REDACTED]

[REDACTED]

C. Wire

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We strongly encourage you to review this material and adapt it to your particular needs in order to develop and maintain a positive safety culture as you engage in NRC-regulated activities.

Sincerely,

Colleen C. Casey

Digitally signed by Colleen C.

Casey

Date: 2023.01.02 23:43:58 -06'00'

Colleen Carol Casey
Health Physicist
Materials Licensing Branch

License No. 12-20175-01
Docket No. 030-18055

Enclosure:

Amendment No. 16

[REDACTED]