



CTI and Associates, Inc.

12482 Emerson Drive Brighton, MI 48116 248.486.5100 248.486.5050 Fax

May 28, 2008

Materials Licensing Branch  
US Nuclear Regulatory Commission – Region III  
2443 Warrenville Road, Suite 210  
Lisle, Illinois 60532-4352

RE: Renewal of Radioactive Materials License No. 21-17007-01

Please note this correspondence is to request a renewal for our radioactive materials license which expires on July 31, 2008.

We understand our Pennsylvania location will be transferred to the Commonwealth of Pennsylvania for regulation. Therefore, we have removed the Pennsylvania address from our NRC license application.

If you have any questions regarding the requested amendments, please call me at (248) 486-5100.

Sincerely,

**CTI and ASSOCIATES, INC.**

A handwritten signature in black ink, appearing to read 'James C. Meehle', is written over the typed name.

James C. Meehle  
Radiation Safety Officer

JCM:ram

Attachments

RECEIVED JUN 03 2008

**APPLICATION FOR MATERIAL LICENSE**

Estimated burden per response to comply with this mandatory collection request: 4.4 hours. Submittal of the application is necessary to determine that the applicant is qualified and that adequate procedures exist to protect the public health and safety. Send comments regarding burden estimate to the Records and FOIA/Privacy Services Branch (T-5 F53), U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001, or by internet e-mail to infocollects@nrc.gov, and to the Desk Officer, Office of Information and Regulatory Affairs, NEOB-10202, (3150-0120), Office of Management and Budget, Washington, DC 20503. If a means used to impose an information collection does not display a currently valid OMB control number, the NRC may not conduct or sponsor, and a person is not required to respond to, the information collection.

**INSTRUCTIONS: SEE THE APPROPRIATE LICENSE APPLICATION GUIDE FOR DETAILED INSTRUCTIONS FOR COMPLETING APPLICATION. SEND TWO COPIES OF THE ENTIRE COMPLETED APPLICATION TO THE NRC OFFICE SPECIFIED BELOW.**

APPLICATION FOR DISTRIBUTION OF EXEMPT PRODUCTS FILE APPLICATIONS WITH:

IF YOU ARE LOCATED IN:

DIVISION OF INDUSTRIAL AND MEDICAL NUCLEAR SAFETY  
OFFICE OF NUCLEAR MATERIALS SAFETY AND SAFEGUARDS  
U.S. NUCLEAR REGULATORY COMMISSION  
WASHINGTON, DC 20555-0001

ILLINOIS, INDIANA, IOWA, MICHIGAN, MINNESOTA, MISSOURI, OHIO, OR WISCONSIN, SEND APPLICATIONS TO:

MATERIALS LICENSING BRANCH  
U.S. NUCLEAR REGULATORY COMMISSION, REGION III  
2443 WARRENVILLE ROAD, SUITE 210  
LISLE, IL 60532-4352

ALL OTHER PERSONS FILE APPLICATIONS AS FOLLOWS:

IF YOU ARE LOCATED IN:

ALABAMA, CONNECTICUT, DELAWARE, DISTRICT OF COLUMBIA, FLORIDA, GEORGIA, KENTUCKY, MAINE, MARYLAND, MASSACHUSETTS, MISSISSIPPI, NEW HAMPSHIRE, NEW JERSEY, NEW YORK, NORTH CAROLINA, PENNSYLVANIA, PUERTO RICO, RHODE ISLAND, SOUTH CAROLINA, TENNESSEE, VERMONT, VIRGINIA, VIRGIN ISLANDS, OR WEST VIRGINIA, SEND APPLICATIONS TO:

ALASKA, ARIZONA, ARKANSAS, CALIFORNIA, COLORADO, HAWAII, IDAHO, KANSAS, LOUISIANA, MONTANA, NEBRASKA, NEVADA, NEW MEXICO, NORTH DAKOTA, OKLAHOMA, OREGON, PACIFIC TRUST TERRITORIES, SOUTH DAKOTA, TEXAS, UTAH, WASHINGTON, OR WYOMING, SEND APPLICATIONS TO:

LICENSING ASSISTANCE TEAM  
DIVISION OF NUCLEAR MATERIALS SAFETY  
U.S. NUCLEAR REGULATORY COMMISSION, REGION I  
475 ALLENDALE ROAD  
KING OF PRUSSIA, PA 19406-1415

NUCLEAR MATERIALS LICENSING BRANCH  
U.S. NUCLEAR REGULATORY COMMISSION, REGION IV  
611 RYAN PLAZA DRIVE, SUITE 400  
ARLINGTON, TX 76011-4005

PERSONS LOCATED IN AGREEMENT STATES SEND APPLICATIONS TO THE U.S. NUCLEAR REGULATORY COMMISSION ONLY IF THEY WISH TO POSSESS AND USE LICENSED MATERIAL IN STATES SUBJECT TO U.S. NUCLEAR REGULATORY COMMISSION JURISDICTIONS.

1. THIS IS AN APPLICATION FOR (Check appropriate item)

- A. NEW LICENSE
- B. AMENDMENT TO LICENSE NUMBER \_\_\_\_\_
- C. RENEWAL OF LICENSE NUMBER 21-17007-01

2. NAME AND MAILING ADDRESS OF APPLICANT (Include ZIP code)

CTI and Associates, Inc.  
12482 Emerson Drive  
Brighton, Michigan 48116  
  
James C. Meehle

3. ADDRESS WHERE LICENSED MATERIAL WILL BE USED OR POSSESSED

7135 Dan McGuire Drive, Suite B  
Brighton, Michigan 48116

4. NAME OF PERSON TO BE CONTACTED ABOUT THIS APPLICATION

248-486-5100  
TELEPHONE NUMBER

SUBMIT ITEMS 5 THROUGH 11 ON 8-1/2 X 11" PAPER. THE TYPE AND SCOPE OF INFORMATION TO BE PROVIDED IS DESCRIBED IN THE LICENSE APPLICATION GUIDE.

5. RADIOACTIVE MATERIAL

a. Element and mass number, b. chemical and/or physical form; and c. maximum amount which will be possessed at any one time.

6. PURPOSE(S) FOR WHICH LICENSED MATERIAL WILL BE USED.

7. INDIVIDUAL(S) RESPONSIBLE FOR RADIATION SAFETY PROGRAM AND THEIR TRAINING EXPERIENCE.

8. TRAINING FOR INDIVIDUALS WORKING IN OR FREQUENTING RESTRICTED AREAS.

9. FACILITIES AND EQUIPMENT.

10. RADIATION SAFETY PROGRAM.

11. WASTE MANAGEMENT.

12. LICENSE FEES (See 10 CFR 170 and Section 170.31)

FEE CATEGORY	AMOUNT ENCLOSED	\$

13. CERTIFICATION. (Must be completed by applicant) THE APPLICANT UNDERSTANDS THAT ALL STATEMENTS AND REPRESENTATIONS MADE IN THIS APPLICATION ARE BINDING UPON THE APPLICANT.

THE APPLICANT AND ANY OFFICIAL EXECUTING THIS CERTIFICATION ON BEHALF OF THE APPLICANT, NAMED IN ITEM 2, CERTIFY THAT THIS APPLICATION IS PREPARED IN CONFORMITY WITH TITLE 10, CODE OF FEDERAL REGULATIONS, PARTS 30, 32, 33, 34, 35, 36, 39, AND 40, AND THAT ALL INFORMATION CONTAINED HEREIN IS TRUE AND CORRECT TO THE BEST OF THEIR KNOWLEDGE AND BELIEF.

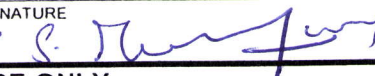
WARNING: 18 U.S.C. SECTION 1001 ACT OF JUNE 25, 1948 62 STAT. 749 MAKES IT A CRIMINAL OFFENSE TO MAKE A WILLFULLY FALSE STATEMENT OR REPRESENTATION TO, ANY DEPARTMENT OR AGENCY OF THE UNITED STATES AS TO ANY MATTER WITHIN ITS JURISDICTION.

CERTIFYING OFFICER -- TYPED/PRINTED NAME AND TITLE

SIGNATURE

DATE

MORGAN SUBBARAYAN, PRESIDENT



06/02/08

**FOR NRC USE ONLY**

TYPE OF FEE	FEE LOG	FEE CATEGORY	AMOUNT RECEIVED	CHECK NUMBER	COMMENTS
			\$		
APPROVED BY				DATE	

**ITEM 5: RADIOACTIVE MATERIALS TO BE POSSESSED AND PROPOSED USES**

<b>Radioisotope</b>	<b>Manufacturer or Distributor Model No.</b>	<b>Quantity</b>	<b>Use As Listed on SSD Certificate</b>	<b>Specify Other Uses Not Listed on SSD Certificate</b>
Cesium-137	Sealed source (Amersham Model No. CDCW556 or Isotope Products Model No. HEG-0058)	No single source to exceed 9 millicuries each. <b>Total activity 126 millicuries</b>	Yes	
Americium-241	Sealed source (Amersham Model No. AMNV.997 or Isotope Products Model Nos. 3021 or 3027)	No single source to exceed 44 millicuries each. <b>Total activity 616 millicuries</b>	Yes	
Cesium-137	Sealed source (Troxler Dwg. No. A-102112)	No single source to exceed 9 millicuries each. <b>Total activity 117 millicuries</b>	Yes	
Americium-241	Sealed source (Troxler Dwg. No. A-102451)	No single source to exceed 44 millicuries each. <b>Total activity 572 millicuries</b>	Yes	
Cesium-137	Sealed source (Boart Longyear Co. Model CPN-131)	No single source to exceed 10 millicuries each. <b>Total activity 10 millicuries</b>	Yes	
Americium-241	Sealed source (Boart Longyear Co. Model CPN-131)	No single source to exceed 50 millicuries each. <b>Total activity 50 millicuries</b>	Yes	
<i>Financial Assurance Required and Evidence of Financial Assurance Provided</i>				

**ITEMS 6 THROUGH 11: TRAINING AND EXPERIENCE, FACILITIES AND EQUIPMENT, RADIATION SAFETY PROGRAM, AND WASTE DISPOSAL**

Item No. and Title	Suggested Response	Yes	Alternative Procedures Attached
<p><b>6. PURPOSE FOR WHICH LICENSED MATERIALS WILL BE USED</b></p>	<p>Licensed material will be used in Troxler Electronics Labs, Inc. (manufacturer) (A, B) 3400 Series surface moisture/density gauge and/or Boart Longyear Company Model MC portable gauges for measuring moisture and density of construction materials.</p>	<p>X</p>	
<p><b>7. INDIVIDUAL (S) RESPONSIBLE FOR RADIATION SAFETY PROGRAM, THEIR TRAINING AND EXPERIENCE:</b></p> <p>Name: James C. Meehle</p>	<p>The Radiation Safety Officer (RSO) for the activities authorized by this license is James C. Meehle who has been RSO for the past 12 years and authorized operator for 23 years.</p>	<p>X</p>	
<p><b>8. TRAINING PROVIDED TO OTHER USERS</b></p>	<p>The training of personnel who will be using devices under this license is performed by personnel attending Troxler Electronics Laboratories, Inc. devices operation and radiation safety course, or other qualified organization. Personnel must successfully complete the course before transporting or entering the field with devices.</p>	<p>X</p>	
<p><b>9. FACILITIES AND EQUIPMENT</b></p>	<p>Storage facilities for devices are maintained at location given in <b>Item 3</b>. Locked Storage rooms are located in designated areas (out of the way of general public) to prevent access by unauthorized persons. Warning signs are also posted in the area to notify the general public. Keys to these rooms are given to only authorized gauge operators who will work with the gauges in the field. When gauges are not in use, they are returned directly to these secured rooms or for storage transporting vehicles for storage.</p>	<p>X</p>	
<p><b>10. RADIATION SAFETY PROGRAM – PERSONNEL MONITORING EQUIPMENT</b></p>	<p>Each employee associated with the use and care of the gauges is required to wear a TLD badge to monitor emissions from devices. These badges provided by Landauer, Inc., are issued every quarter (90 days) with the results of the previous quarter posted. These reports are then kept on file as a part of the company's permanent record.</p>	<p>X</p>	

Item No. and Title	Suggested Response	Yes	Alternative Procedures Attached
10. RADIATION SAFETY PROGRAM – RADIATION DETECTION INSTRUMENTS	CTI and Associates, Inc., currently has a radiation survey meter and is used to check emissions from storage areas and devices.	X	
10. RADIATION SAFETY PROGRAM – LEAK TESTING	Leak testing of the gauges is performed by the Radiation Safety Officer or authorized user every six (6) months. A commercial leak test kit, Model LT-2 is provided by our consultant, Stan A. Huber Consultants, Inc., 200 N. Cedar Road, New Lenox, IL 60451-1751. Test results are kept on file as part of the gauges maintenance record.	X	
10. RADIATION SAFETY PROGRAM – MAINTENANCE	Maintenance of the devices, such as cleaning, any minor repairs, is performed with the source rod in the safe shielded position. Major repairs are sent to the licensed manufacturer/or qualified organization.	X	
10. RADIATION SAFETY PROGRAM – TRANSPORTATION OF DEVICES TO FIELD LOCATIONS	Transportation of devices to field locations is done in accordance with the applicable requirements of the DOT and the Michigan DOT. The required labels on the container of the devices are displayed as per DOT and MDOT requirements. Proper transport papers are also carried by transporter (technicians) in charge of the devices. A Bill of Lading and shipping manifest are included items with the gauge along with a copy of operating and emergency procedures. Double barrier locking devices are maintained while transporting gauges.	X	
10. RADIATION SAFETY PROGRAM – OPERATING PROCEDURES FOR NUCLEAR GAUGING DEVICES (Personnel Monitoring)	Personnel authorized in handling devices are required to wear TLD badges at all times. Badges are not to be stored near devices or left in direct sunlight. Badge reports are a part of the permanent record kept on file.	X	
10. RADIATION SAFETY PROGRAM – OPERATING PROCEDURES FOR NUCLEAR GAUGING DEVICES (Use of Nuclear Devices)	Step by step procedures are outlined in the Instruction Manual. See appropriate manual for specific devices.	X	

Item No. and Title	Suggested Response	Yes	Alternative Procedures Attached
10. RADIATION SAFETY PROGRAM – OPERATING PROCEDURES FOR NUCLEAR GAUGING DEVICES (Storage of Devices)	When not in use, the devices shall be kept in the designated storage rooms or locked in vehicles on temporary job sites. The storage rooms will be locked at all times and restricted to only authorized personnel. While on a work site, the device will be under constant physical surveillance by the technician or stored securely in a non-hazardous, safe area, secured in the technician's transport vehicle with source rod of devices locked. Under no circumstances is the gauge to be left unattended without the proper safety/security steps taken.	X	
10. RADIATION SAFETY PROGRAM – OPERATING PROCEDURES FOR NUCLEAR GAUGING DEVICES (Transportation)	Transportation of devices from laboratory to work site and back must be under the guidance of the RSO. Proper labeling and paperwork will accompany each device when in transit. Both the DOT and MDOT rules and regulations for transport of devices will be adhered to. At no time will a device be permitted to ride next to a passenger and/or driver.	X	
10. RADIATION SAFETY PROGRAM – OPERATING PROCEDURES FOR NUCLEAR GAUGING DEVICES (Leak Testing for Gauging Devices)	Leak tests are to be performed by the Radiation Safety Officer. However, if the RSO cannot perform this duty, the following steps should be followed:  To perform the wet and dry tests on the gauge, first remove the scaler modular from the front of the gauge. Looking down into the cavity of the scaler, wipe the yellow radiation label with a wet wipe. Next, turn the gauge on one side and wipe the hole where the source rod passes. Note: Be absolutely sure the source rod remains in a shielded or safe position before starting this procedure. Wet wipe is then placed and sealed in the labeled plastic bag and the procedure is repeated for the dry wipe test. Leak test kit along with other specific information is then sent to Stan A. Huber Consultants, Inc.	X	
10. RADIATION SAFETY PROGRAM – OPERATING PROCEDURES FOR NUCLEAR GAUGING DEVICES (Emergency Procedures)	We will implement and maintain the operating and emergency procedures in Appendix H of NUREG – 1556 Vol. 1 and provide copies to be kept with all authorized gauge users and temporary job sites.	X	
10. RADIATION SAFETY PROGRAM – OPERATING PROCEDURES FOR NUCLEAR GAUGING	When performing tests at temporary job sites, the authorized user shall not leave the device unattended. If the device is not going to be under the constant control and surveillance of the authorized	X	

Item No. and Title	Suggested Response	Yes	Alternative Procedures Attached
<p><b>DEVICES (Storage of Devices at Temporary Job Sites)</b></p>	<p>user, the device source rod handle locking mechanism shall be padlocked, placed in transportation case and locked at the hasp on the case and a tight chain with a second lock secured around the case.</p> <p>The case is securely fastened to vehicle with two chains and padlocks to prevent unauthorized use, loss or theft.</p> <p>The transportation case shall be blocked or fastened to restrict the movement of transportation case during transportation of device. If the device is stored at a temporary job site (building, trailer, etc.) the device shall be stored in an area out of the way of general public to prevent access by unauthorized persons. The device source rod handle locking mechanism shall be padlocked, the device shall be placed in the transportation case and the case shall be secured by a double barrier locking method to prevent unauthorized use, loss or theft. A typical double barrier locking system would consist of the gauge being locked in the case, a second lock and chain wrapped tightly around the case, a third lock and chain locked to a non moveable item such as a building column, in a locked room or locked by a fourth chain and lock to a non <b>moveable item or structure</b>. Storage of devices at these locations shall be only at the direction of Radiation Safety Officer. Temporary job sites 45 miles or less back to any of CTI and Associates, Inc. office to be secured in the designated storage rooms for devices.</p>		
<p><b>10. RADIATION SAFETY PROGRAM – OPERATING PROCEDURES FOR NUCLEAR GAUGING DEVICES (Operating and Emergency Procedures)</b></p>	<p>All authorized nuclear device users shall have a copy of the operating and emergency procedures when using or transporting devices along with all other required documentation for the use and transportation of devices.</p>	<p><b>X</b></p>	
<p><b>11. WASTE MANAGEMENT</b></p>	<p>Disposal will be by a specifically authorized license of the NRC, in most cases, by the original supplier, Troxler Electronics Laboratories, Inc.</p>	<p><b>X</b></p>	

## Operating Procedures

- If personnel dosimetry is provided:
  - Always wear your assigned thermoluminescent dosimeter (TLD) or film badge when using the gauge;
  - Never wear another person's TLD or film badge;
  - Never store your TLD or film badge near the gauge.
- Before removing the gauge from its place of storage, ensure that, where applicable, each gauge source is in the fully shielded position and that in gauges with a movable rod containing a sealed source, the source rod is locked (e.g., keyed lock, padlock, mechanical control) in the shielded position. Place the gauge in the transport case and lock the case.
- Sign out the gauge in a log book (that remains at the storage location) including the date(s) of use, name(s) of the authorized users who will be responsible for the gauge, and the temporary job site(s) where the gauge will be used.
- Block and brace the gauge to prevent movement during transport and lock the gauge in or to the vehicle. Follow all applicable Department of Transportation (DOT) requirements when transporting the gauge.
- Use the gauge according to the manufacturer's instructions and recommendations.
- Do not touch the unshielded source rod with your fingers, hands, or any part of your body.
- Do not place hands, fingers, feet, or other body parts in the radiation field from an unshielded source.
- Unless absolutely necessary, do not look under the gauge when the source rod is being lowered into the ground. If you must look under the gauge to align the source rod with the hole, follow the manufacturer's procedures to minimize radiation exposure.
- After completing each measurement in which the source is unshielded, immediately return the source to the shielded position.
- Always maintain constant surveillance and immediate control of the gauge when it is not in storage. At job sites, do not walk away from the gauge when it is left on the ground. Take action necessary to protect the gauge and yourself from danger of moving heavy equipment.
- Always keep unauthorized persons away from the gauge.
- Perform routine cleaning and maintenance according to the manufacturer's instructions and recommendations.
- When the gauge is not in use at a temporary job site, place the gauge in a secured storage location (e.g., locked in the trunk of a car or locked in a storage shed).



## APPENDIX H

- Before transporting the gauge, ensure that, where applicable, each gauge source is in the fully shielded position. Ensure that in gauges with a movable source rod, the source rod is locked in the shielded position (e.g., keyed lock, padlock, mechanical control). Place the gauge in the transport case and lock the case. Block and brace the case to prevent movement during transportation. Lock the case in or to the vehicle, preferably in a closed compartment.
- Return the gauge to its proper locked storage location at the end of the work shift.
- Log the gauge into the daily use log when it is returned to storage.
- If gauges are used for measurements with the unshielded source extended more than 3 feet beneath the surface, use piping, tubing, or other casing material to line the hole from the lowest depth to 12 inches above the surface. If the piping, tubing, or other casing material cannot extend 12 inches above the surface, cap the hole liner or take other steps to ensure that the hole is free of debris (and it is unlikely that debris will re-enter the cased hole) so that the unshielded source can move freely (e.g., use a dummy probe to verify that the hole is free of obstructions).
- After making changes affecting the gauge storage area (e.g., changing the location of gauges within the storage area, removing shielding, adding gauges, changing the occupancy of adjacent areas, moving the storage area to a new location), reevaluate compliance with public dose limits and ensure proper security of gauges.

### Emergency Procedures

If the source fails to return to the shielded position (e.g., as a result of being damaged, source becomes stuck below the surface), or if any other emergency or unusual situation arises (e.g., the gauge is struck by a moving vehicle, is dropped, is in a vehicle involved in an accident):

- Immediately secure the area and keep people at least 15 feet away from the gauge until the situation is assessed and radiation levels are known. However, perform first aid for any injured individuals and remove them from the area only when medically safe to do so.
- If any heavy equipment is involved, detain the equipment and operator until it is determined there is no contamination present.
- Gauge users and other potentially contaminated individuals should not leave the scene until emergency assistance arrives.
- Notify the following persons, in the order listed below, of the situation:



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MATERIALS LICENSING BRANCH  
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TM 8014 HIZ 7.0.0 INT4420

CHERRION BROWN  
2484865100  
CTI AND ASSOCIATES, INC.  
12482 EMERSON DRIVE  
BRIGHTON MI 48116

LTR 1 OF 1

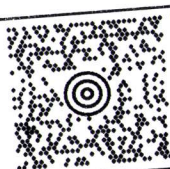
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