



**UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
REGION IV  
611 RYAN PLAZA DRIVE, SUITE 400  
ARLINGTON, TEXAS 76011-8064**

April 22, 2005

Knight Piesold, LLC  
ATTN: Sam Bush  
Radiation Safety Officer  
1050 Seventeenth Street, Suite 450  
Denver, Colorado 80265-2011

SUBJECT: TERMINATION OF NRC RADIOACTIVE MATERIALS LICENSE NO. 05-26986-01

By NRC Form 314 dated January 31, 2005, you contacted the U.S. Nuclear Regulatory Commission and indicated that you wished to terminate your NRC radioactive materials license. The NRC staff has reviewed your transfer records and sealed source leak test results. Based on its review, the staff has concluded that: 1) all licensable radioactive material has been removed from your facility and 2) residual radioactive material attributable to licensed activities does not exceed current NRC criteria.

Based on these conclusions no further remediation or actions with respect to NRC regulated material is required. NRC license number 05-26986-01 is hereby terminated.

In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice," a copy of this letter and its enclosure 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 note that on October 25, 2004, the NRC suspended public access to ADAMS, and initiated an additional security review of publicly available documents to ensure that potentially sensitive information is removed from the ADAMS database accessible through the NRC's web site. Interested members of the public may obtain copies of the referenced documents for review and/or copying by contacting the Public Document Room pending resumption of public access to ADAMS. The NRC Public Document Room is located at NRC Headquarters in Rockville, MD, and can be contacted at 800-397-4209 or 301-415-4737 or [pdr@nrc.gov](mailto:pdr@nrc.gov).

Knight Piesold, LLC

If you have questions or require clarification on any of the information stated above, please contact me at (925) 673-9646.

Sincerely,

**\RA\**

James L. Montgomery, Health Physicist  
Nuclear Materials Licensing Branch

Docket: 030-31080  
License: 05-26986-01  
Control: 470391

Enclosures: As stated

Materials License Termination/Retirement Form

LICENSE #: 05-26986-01

DOCKET #: 030-31080

LICENSEE: Knight Piesold, LLC

EXPIRATION DATE: January 31, 2005

ADDRESS: 1050 17<sup>th</sup> Street, Suite 450  
Denver, CO 80265

DATE OF CONTACT: 1/31/05

CONTACTED BY: Barbara Filas

TITLE: President

TELEPHONE: 303-371-8440

LICENSE TERMINATED: XX

LICENSE TRANSFERRED:

LICENSE TRANSFERRED TONAME:

ADDRESS:

TELEPHONE:

BASIS FOR TERMINATION AND/OR RETIREMENT: All material transferred to licensee's Nevada Agreement State license #00-11-0290-01

TERMINATION DOCUMENTATION

1. License termination meets Type I criteria: Y  X  N

Licensee used sealed sources only and the most recent leak test demonstrates that they did not leak while in the licensee's possession

Licensee used radioactive material with  $T_{1/2}$  # 60 days and it has decayed to less than the activity in 10 CFR Part 20, Appendix C

2. License termination meets type II criteria: Y  N  X

Licensee possessed and used only sealed sources but cannot demonstrate that the sources did not leak while in the licensee's possession

Licensee possessed unsealed radioactive material with  $T_{1/2}$  # 60 days but the maximum activity authorized under the license has not decayed to less than the quantity specified in 10 CFR Part 20, Appendix C

Licensee possessed unsealed radioactive material with  $T_{1/2} > 60$  days but # 120 days

Licensee possessed  $^{14}\text{C}$  or  $^3\text{H}$  but the total activity and use authorized under the license warrants decommissioning under Type II (describe rationale above)

3. License termination meets Type III criteria: Y  N  X

Decommissioning qualifies for a categorical exclusion under 10 CFR 51.22(c) and

Licensee will decommission its facility in accordance with the NRC's criteria for unrestricted use

4. License termination meets Type IV criteria: Y \_\_\_\_\_ N X
- \_\_\_\_\_ Decommissioning does not qualify for a categorical exclusion under 10 CFR 51.22(c)
- \_\_\_\_\_ Licensee will decommission its facility such that residual radioactive material may remain in excess of NRC's criteria for unrestricted use
5. Termination survey required: Y \_\_\_\_\_ N X
- \_\_\_\_\_ Termination survey submitted by licensee
- \_\_\_\_\_ Termination survey satisfies NRC survey requirements
6. Form 314 or equivalent submitted: Y X N \_\_\_\_\_
- X Staff verified disposition of sealed sources or unsealed radioactive material by:  
 \_\_\_\_\_ letter from Form 314 recipient  
X call to Form 314 recipient
7. Licensee transfer records discussed in 10 CFR Parts 30.35, 30.36, 30.51; 40.36, 40.42, 40.61; or 70.25, 70.38, 70.51 Y \_\_\_\_\_ N X  
 Sealed source only, not required
- \_\_\_\_\_ to USNRC  
 \_\_\_\_\_ To individual assuming responsibility for the license, with a copy of the cover letter to NRC
8. NRC closeout inspection required: Y \_\_\_\_\_ N X
- \_\_\_\_\_ Closeout inspection performed:
- on:  
 Inspector:
9. Closeout survey performed: Y \_\_\_\_\_ N X
- on:  
 by:

Licensing staff \_\_\_\_\_ /RA/  
 completing form: \_\_\_\_\_  
 James L. Montgomery, Health Physicist

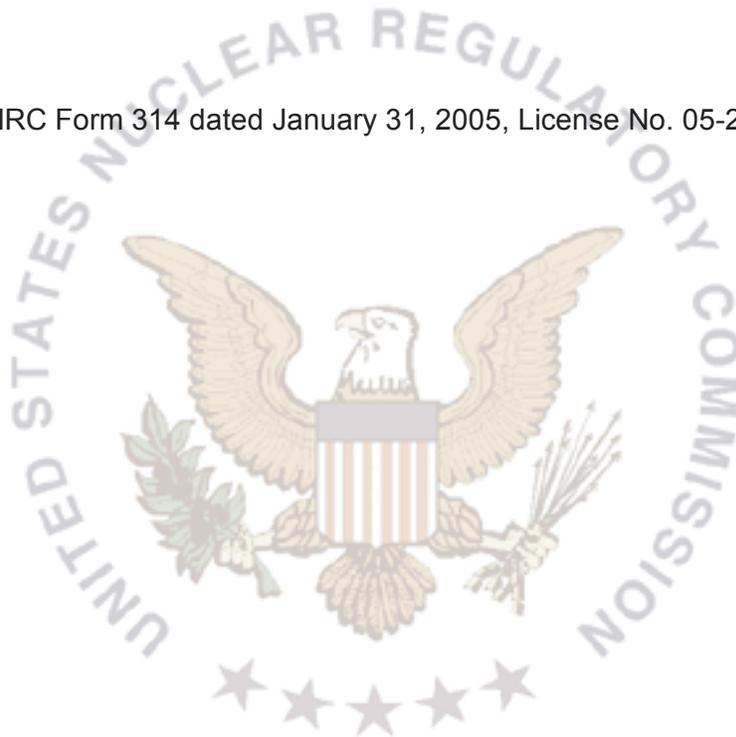
Date: April 22, 2005

**MATERIALS LICENSE  
SUPPLEMENTARY SHEET**License Number  
05-26986-01Docket or Reference Number  
030-31080

Amendment No. 01

Knight Piesold, LLC  
1050 Seventeenth Street, Suite 450  
Denver, Colorado 80265

In accordance with NRC Form 314 dated January 31, 2005, License No. 05-26986-01 is hereby terminated.



FOR THE U.S. NUCLEAR REGULATORY COMMISSION

\RA\

Date April 22, 2005

By

James L. Montgomery, Health Physicist  
Nuclear Materials Licensing Branch  
Region IV  
Arlington, Texas 76011