

A & A CONSULTANTS, INC.

030-34978

FACSIMILE TRANSMITTAL SHEET

TO: <i>Mr. J Bendick</i>	FROM: AJ M. Ahmed, P.E.
COMPANY:	DATE: <i>2/25/99</i>
FAX NUMBER: <i>(610) 337-5393</i>	TOTAL NO. OF PAGES INCLUDING COVER: <i>4</i>
PHONE NUMBER: <i>(610) 337-6951</i>	SENDER'S REFERENCE NUMBER:
RE:	YOUR REFERENCE NUMBER:

URGENT
 FOR REVIEW
 PLEASE COMMENT
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NOTES/COMMENTS:

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APPENDIX B

ITEMS 5 & 6: MATERIALS TO BE POSSESSED AND PROPOSED USES

YES	NO	RADIOISOTOPE	MANUFACTURER/ MODEL NO.	QUANTITY	MOST COMMON USE	SPECIFY OTHER USES NOT LISTED ON SSD CERTIFICATE	
<input checked="" type="checkbox"/>		Cesium-137	Sealed sources in compatible gauges as specified in Sealed Source and Device Registration Sheet	Not to exceed maximum activity per source as specified in Sealed Source and Device Registration Sheet	Measure Physical Properties of Materials	<input checked="" type="checkbox"/> Not applicable [] Uses are:	
<input checked="" type="checkbox"/>		Americium-241	Sealed neutron sources in compatible gauges as specified in Sealed Source and Device Registration Sheet	Not to exceed maximum activity per source as specified in Sealed Source and Device Registration Sheet	Measure Physical Properties of Materials	<input checked="" type="checkbox"/> Not applicable [] Uses are:	
		Californium-252	Sealed neutron sources in compatible gauges as specified in Sealed Source and Device Registration Sheet	Not to exceed maximum activity per source as specified in Sealed Source and Device Registration Sheet	Measure Physical Properties of Materials	[] Not applicable [] Uses are:	
		Other (specify)					
<input checked="" type="checkbox"/>		FINANCIAL ASSURANCE REQUIRED AND EVIDENCE OF FINANCIAL ASSURANCE PROVIDED					NO

APPENDIX B

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	<p>Before obtaining licensed materials, the proposed <i>RSO</i> will have successfully completed one of the training courses described in Criteria in the section entitled "Individual(s) Responsible for Radiation Safety Program and Their Training and Experience - Radiation Safety Officer" in NUREG-1556, Vol. 1, dated May 1997.</p> <p style="text-align: center;">AND</p> <p>Before being named as the <i>RSO</i>, future <i>RSOs</i> will have successfully completed one of the training courses described in Criteria in the section entitled "Individual(s) Responsible for Radiation Safety Program and Their Training and Experience - Radiation Safety Officer" in NUREG-1556, Vol. 1, May 1997.</p>	<input checked="" type="checkbox"/>	[]
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 Criteria in the section entitled "Training for Individuals Working In or Frequenting Restricted Areas" in NUREG-1556, Vol. 1, dated May 1997.	<input checked="" type="checkbox"/>	[]
9. FACILITIES AND EQUIPMENT	No information needs to be submitted in response to this item; key issues are addressed under "Radiation Safety Program - Public Dose" and "Radiation Safety Program - Operating and Emergency Procedures".		Separate Item 9 Response Need Not Be Submitted With Application
10. RADIATION SAFETY PROGRAM - AUDIT PROGRAM	The applicant is <u>not</u> required to, and should not, submit its audit program to the <i>NRC</i> for review during the licensing phase.		Need Not Be Submitted With Application
10. RADIATION SAFETY PROGRAM - TERMINATION OF ACTIVITIES	The applicant is <u>not</u> required to submit a response to the termination of activities section during the initial application. However, when the license expires or at the time the licensee ceases operations, <i>NRC Form 314</i> must be submitted.		Need Not Be Submitted With Application
10. RADIATION SAFETY PROGRAM - SURVEY INSTRUMENTS	We will either possess and use, or have access to and use, a radiation survey meter that meets the Criteria in the section entitled "Radiation Safety Program - Instruments" in NUREG-1556, Vol. 1, dated May 1997, in the event of an incident.	<input checked="" type="checkbox"/>	[]
10. RADIATION SAFETY PROGRAM - MATERIAL RECEIPT AND ACCOUNTABILITY	Physical inventories will be conducted at intervals not to exceed 6 months, to account for all sealed sources and devices received and possessed under the license.	<input checked="" type="checkbox"/>	[]
10. RADIATION SAFETY PROGRAM - OCCUPATIONAL DOSIMETRY	Either we will maintain, for inspection by <i>NRC</i> , documentation demonstrating that unmonitored individuals are not likely to receive a radiation dose in excess of 10% of the allowable limits in 10 CFR Part 20 or we will provide dosimetry processed and evaluated by a <i>NVLAP</i> -approved processor that is exchanged at a frequency recommended by the processor.	<input checked="" type="checkbox"/>	[]
10. RADIATION SAFETY PROGRAM - PUBLIC DOSE	The applicant is <u>not</u> required to submit a response to the public dose section during the licensing phase. This matter will be examined during an inspection.		Need Not Be Submitted With Application

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ITEM NO. AND TITLE	SUGGESTED RESPONSE	YES	ALTERNATIVE PROCEDURES ATTACHED
<p>10. RADIATION SAFETY PROGRAM - OPERATING & EMERGENCY PROCEDURES</p>	<p>We will implement and maintain the operating and emergency procedures in <i>Appendix H</i> of NUREG-1556, Vol. 1, dated May 1997, and provide copies of these procedures to all gauge users and at each job site.</p> <p style="text-align: center;">OR</p> <p>Operating and emergency procedures will be developed, implemented, and maintained and will meet the criteria in the section entitled "Radiation Safety Program - Operating and Emergency Procedures" in NUREG-1556, Vol. 1, dated May 1997.</p>	<p><input checked="" type="checkbox"/></p> <p><input type="checkbox"/></p>	<p><input type="checkbox"/></p>
<p>10. RADIATION SAFETY PROGRAM - LEAK TEST</p>	<p>Leak tests will be performed at intervals approved by the NRC or an Agreement State and specified in the Sealed Source and Device Registration Sheet. Leak tests will be performed by an organization authorized by NRC or an Agreement State to provide leak testing services for other licensees or using a leak test kit supplied by an organization authorized by NRC or an Agreement State to provide leak test kits to other licensees and according to the kit supplier's instructions.</p>	<p><input checked="" type="checkbox"/></p>	<p><input type="checkbox"/></p> <p>The information in <i>Appendix J</i> supporting a request to perform leak testing and sample analysis is attached.</p>
<p>10. RADIATION SAFETY PROGRAM - MAINTENANCE</p>	<p>ROUTINE CLEANING & LUBRICATION</p> <p>We will implement and maintain procedures for routine maintenance of our gauges according to each manufacturer's recommendations and instructions.</p> <p>NON-ROUTINE MAINTENANCE</p> <p>We will send the gauge to the manufacturer or other person authorized by NRC or an Agreement State to perform non-routine maintenance or repair operations that require the removal of the source or source rod from the gauge.</p>	<p><input checked="" type="checkbox"/></p> <p><input checked="" type="checkbox"/></p>	<p><input type="checkbox"/></p> <p><input type="checkbox"/></p> <p>The information listed in <i>Appendix G</i> supporting a request to perform non-routine maintenance in-house is attached.</p>
<p>10. RADIATION SAFETY PROGRAM - TRANSPORTATION</p>	<p>The applicant is not required to submit its response to transportation during the licensing process. However, this issue will be reviewed during inspection.</p>	<p><input type="checkbox"/></p>	<p>Need Not Be Submitted With Application</p>
<p>11. WASTE MANAGEMENT - GAUGE DISPOSAL & TRANSFER</p>	<p>The applicant is not required to submit a response to waste management during the licensing process. However, the licensee should develop, implement, and maintain gauge transfer and disposal procedures in its radiation protection program.</p>	<p><input type="checkbox"/></p>	<p>Need Not Be Submitted With Application</p>