



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION IV
611 RYAN PLAZA DRIVE, SUITE 400
ARLINGTON, TEXAS 76011-4005

F A C S I M I L E

| | | | |
|-------------------|-----------------------------|---------------------|-------------|
| Name: | Raymond Hiersche | License No.: | 15-26978-01 |
| Licensee: | COMO Tech Inspection, Inc. | Docket No.: | 030-30996 |
| Fax No.: | 913-422-5838 | | |
| Phone No.: | 913-422-5887 | | |
| From: | Rachel S. Browder | | |
| Date: | April 9, 2008 | | |
| Subject: | License Renewal Application | | |
| Pages: | 3 | | |

The purpose of this facsimile is to document the deficiencies identified in your license renewal application dated October 31, 2007. Please contact me at (817) 276-6552 to discuss any specifics associated with these deficiencies that require your response. Please respond to this request by April 28, 2008.

When responding to this request, please provide the license and docket numbers indicated above. If there are any questions, again, please do not hesitate to call me at (817) 276-6552. Thank you for your cooperation.

1. Please provide the Name and Address of the commercial company providing the training course for Assistant Radiographers.
2. Please indicate whether the Radiation Safety Office is Mr. Raymond Hiersche, Sr. or Mr. Raymond Hiersche, Jr.
3. Section 8.2 of the training program submitted for new Assistant Radiographers indicates that a minimum of 2 hours is spent on the hands-on equipment training. The NRC feels that sufficient training to adequately cover the different types of exposure devices and associated equipment authorized by COMO Tech Inspection, and to adequately cover the daily inspection requirements and operation of the survey meter, would take a minimum of 4 hours. Please commit to a minimum of 4 hours to perform the hands-on training of the equipment.
4. The training exam for the Assistant Radiographer and the Radiographer indicates that the passing grade is 70%. The NRC recommends that the passing grade should be 80%. Please commit that you will operate your training program with a passing grade of 80%.
5. In Question # 47 of the Radiographer's Exam, please verify the gamma constant provided for Ir-192. The gamma constant should be around 5164 mR/hr per ft²/Ci.
6. Please indicate whether you will be performing the calibration of your survey instruments or whether you will use an NRC or Agreement State licensee. If you are performing your own survey instrument calibrations (within NRC jurisdiction) then please provide your calibration procedures and the qualifications of the individual(s) performing the calibration.
7. The O&E procedures, Item #7 of Section 1, discusses alarming ratemeters and states that the RA-500 meets the 10 CFR 34.33 requirements for personnel monitoring. The regulation should be updated to reflect 10 CFR 34.47.

8. Please submit O&E procedures for identifying and notifying COMO Tech Inspection, Inc. management and subsequently the NRC, of equipment malfunction or defects that could create a substantial safety hazard as required by 10 CFR Part 21. The notification to the NRC is found in 10 CFR 21.21.



Rachel S. Browder, Health Physicist
Nuclear Materials Safety Branch B