



United States Nuclear Regulatory Commission  
611 Ryan Plaza Drive, Suite 400  
Arlington, Texas 76011-8064  
Attn: Licensing Section  
Re: Request for License Amendment

March 13, 2008

Dear Sir or Madam:

Due to recent management changes, Roxar, Inc. hereby requests that the United States Nuclear Regulatory Commission grant an amendment to License Number 42-27765-01. Included in the request are the following:

- Naming of Marie Benson as Radiation Safety Officer

Although Sigve Hodneland remains as a Roxar, Inc. employee, his duties are primarily in Europe. Ms. Benson successfully completed a 24-Hour Radiation Safety Officer Training Course on October 17, 2007. The course content is based upon guidance provided in NUREG 1556, Volume #4, Appendices G and N, as well as applicable portions of 49CFR. A copy of the training certification is provided.

Roxar, Inc. shall abide by specific license conditions and Title 10 of the Code of Federal Regulations as applicable to uses under this license. If there are any questions or more information is desired please contact this office at (713)-482-6400.

Best Regards,

Joergen Pedersen  
Roxar, Inc.  
Regional Manager- Americas

RECEIVED

MAR 14 2008

DNMS

No. 4,71729  
1



**Applied HEALTH PHYSICS, Inc.**

## **CERTIFICATE OF RADIOLOGICAL TRAINING**

*This is to certify that*

**Marie Benson**

*has successfully completed the*

**24-HOUR RADIATION SAFETY OFFICER TRAINING COURSE  
INCLUDING INSTRUCTION AS REQUIRED BY NUREG-1556  
VOLUME 4, APPENDIX G AND 49 CFR 172, SUBPART H**

*presented by Applied Health Physics, Inc.  
October 15<sup>th</sup> through October 17<sup>th</sup>, 2007*

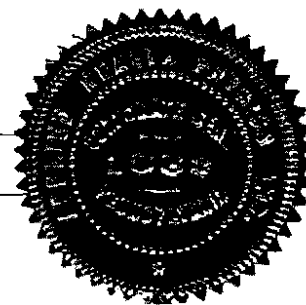
Todd Y. Mobley  
Director, Technical Services

October 17, 2007

Date

October 17, 2010

Expiration Date



**UPS Internet Shipping: View/Print Label**

1. **Print the label(s):** Select the Print button on the print dialog box that appears. Note: If your browser does not support this function select Print from the File menu to print the label.
2. **Fold the printed label at the dotted line.** Place the label in a UPS Shipping Pouch. If you do not have a pouch, affix the folded label using clear plastic shipping tape over the entire label.

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<p style="text-align: right;"><b>1 OF 1</b></p> <p style="text-align: center;"><b>LTR</b></p> <p>MARIE BENSON 713-334-2222 CORROCEAN, INC. 3300 WALNUT BEND LANE HOUSTON TX 77042</p> <p><b>SHIP TO:</b> LICENSING SECTION UNITED STATES NUCLEAR REGULATORY CO SUITE 400 611 RYAN PLAZA DRIVE <b>ARLINGTON TX 76011-4005</b></p>	<p style="font-size: 2em; font-weight: bold;">TX 760 0-10</p> 	<p style="font-size: 2em; font-weight: bold;">UPS NEXT DAY AIR</p> <p style="font-size: 3em; font-weight: bold;">1</p> <p>TRACKING #: 1Z F67 11X 01 9039 4827</p>		<p style="text-align: center;"><b>BILLING: P/P</b></p> <p style="text-align: center;">  </p> <p style="font-size: 0.8em;">                 Reference# 1: License Number 42-27765-01                  Reference# 2: Naming of RSO updated 031308  <small>US 10.1.06 WABZ/P 73.0A 07/2008</small> </p>
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## ACCEPTANCE REVIEW MEMO (ARM)

**Licensee:** Roxar, Inc. **License No.:** 42-27765-01  
**Docket No.:** 030-36402 **Mail Control No.:** 471729  
**Type of Action:** Amend **Date of Requested Action:** 03-13-08  
**Reviewer Assigned:** **ARM reviewer(s):** Torres

Response	Deficiencies Noted During Acceptance Review
	<input type="checkbox"/> Open ended possession limits. Submit inventory. Limit possession. <input type="checkbox"/> Submit copies of latest leak test results. <input type="checkbox"/> Add IC L.C./Fingerprint LC, add SUNSI markings to license. <input type="checkbox"/> Confirm with licensee if they have NARM material.

**Reviewer's Initials:** \_\_\_\_\_ **Date:** \_\_\_\_\_

<input type="checkbox"/> Yes	<input type="checkbox"/> No	Request for unrestricted release Group 2 or >. Consult with Bravo Branch.
<input type="checkbox"/> Yes	<input type="checkbox"/> No	Termination request < 90 days from date of expiration
<input type="checkbox"/> Yes	<input type="checkbox"/> No	Expedite (medical emergency, no RSO, location of use/storage not on license, RAM in possession not on license, other)
<input type="checkbox"/> Yes	<input type="checkbox"/> No	TAR needed to complete action.

**Branch Chief's and/or HP's Initials:** \_\_\_\_\_ **Date:** \_\_\_\_\_

**SUNSI Screening according to RIS 2005-31**

Yes  No **Sensitive and Non-Publicly Available** if any item below is checked


General guidance:

- \_\_\_\_\_ RAM = or > than Category 3 (Table 1, RIS 2005-31), use Unity Rule
- \_\_\_\_\_ Exact location of RAM (whether = or > than Category 3 or not)
- \_\_\_\_\_ Design of structure and/or equipment (site specific)
- \_\_\_\_\_ Information on nearby facilities
- \_\_\_\_\_ Detailed design drawings and/or performance information
- \_\_\_\_\_ Emergency planning and/or fire protection systems

Specific guidance for medical, industrial and academic (above Category 3):

- \_\_\_\_\_ RAM quantities and inventory
- \_\_\_\_\_ Manufacturer's name and model number of sealed sources & devices
- \_\_\_\_\_ Site drawings with exact location of RAM, description of facility
- \_\_\_\_\_ RAM security program information (locks, alarms, etc.)
- \_\_\_\_\_ Emergency Plan specifics (routes to/from RAM, response to security events)
- \_\_\_\_\_ Vulnerability/security assessment/accident-safety analysis/risk assess
- \_\_\_\_\_ Mailing lists related to security response

APR - 2 2008

**Branch Chief's and/or HP's Initials:**  \_\_\_\_\_ **Date:** \_\_\_\_\_

## Checklist to Ensure That Radioactive Material Will Be Used as Intended

### Applicant Information:

Control No. 471729

Name: Roxar, Inc.	Type of Request: Amend Program Code(s): 03120	
Location: TX	License No.: 42-27765-01	Docket No.: 030-36402

### STEP 1, ITEM A - INITIAL SCREENING

<p><b>Instructions for Step 1:</b> Complete Step 1 for all applications. If Step 1, Items A and B, are "YES" then do not complete Step 2. Sign and date the completed form and add it to ADAMS as Non-Sensitive and Non-Publicly Available. If a "NO" response is indicated for Item A or Item B, add the completed form to ADAMS as Sensitive and Non-Publicly Available, and complete Step 2 (Additional Screening). If the type of use is subject to a Security Order, complete Step 3, Item A, without delay. If the additional requirements for increased controls will be applied or voided, complete Step 3, Item B, without delay.</p>	YES or NO
A. The applicant is a known entity or a licensee transferring control to a known entity. This determination has been made using the screening criteria in Worksheet A below.	Yes

### Worksheet A

<p><b>Instructions for Worksheet A:</b> Answer each of the 6 questions below by placing a "Yes", "No", or "NA" response in the column on the right. Best practices for a reviewer are provided after each of the questions. If the answer to any of the 6 questions is "Yes" then indicate "Yes" in Step 1, Item A, above. If the answers to all of the 6 questions is "No" then indicate "No" in Step 1, Item A, above. <b>NOTE</b> - If the reviewer has personal knowledge of the applicant's veracity, this can be taken into account in responding to any questions. For example, if the applicant's management and/or RSO have been associated with a current or previous NRC or Agreement State license, then the applicant may be considered as a known entity.</p>	YES, NO, or NA
1. <b>Does the applicant have a current Agreement State or NRC license?</b> The reviewer should 1) confirm that a valid license/registration/authorization exists for the applicant; and 2) compare the current license to the application to verify that the application represents a reasonable expansion of the licensee's operation (i.e., medical facility adding a gamma knife or an Agreement State licensee obtaining an NRC license in order to work in NRC jurisdiction without filing reciprocity).	Yes
2. <b>Does the applicant have a current Agreement State or NRC license at another location and the new application represents the addition of a new facility within the scope of the licensee's core business?</b> The reviewer should contact the appropriate licensing authority to confirm that a valid license/registration/authorization exists for the applicant and the corporate office of the licensee to verify that it has knowledge of and approves of the new application.	
3. <b>Does the applicant have a current State or Federal government license, registration, authorization, etc., for other operations within the scope of its proposed license activities?</b> (e.g., a company authorized by a State for mining that is now requesting authorization to use fixed gauges). The reviewer should contact the appropriate government office to confirm that the license, registration, authorization, etc., is valid; and the applicant's corporate office to confirm that it has knowledge of and approves of the new application to possess radioactive materials.	
4. <b>Is the applicant a local, State or Federal government agency?</b> The reviewer should contact the local, State or Federal government office to confirm that the applicant is a government entity.	
5. <b>Does the application only involve the relocation of an existing licensee, or its mailing address, to another State?</b> This includes new licenses created from existing licenses listing locations in multiple States, in preparation for transfer of licenses to States that will shortly sign an Agreement with the NRC.	
6. <b>Is the application only the result of a licensee failing to submit a renewal application in a timely manner?</b>	

**STEP 1, ITEM B - INITIAL SCREENING CONTINUED**

<p>B. The applicant is requesting certain radionuclides and quantities that are less than the Risk Significant Quantity (TBq) values in Worksheet B, below, as "highlighted" by the reviewer, or is currently subject to a security order or additional requirements for increased controls. If "Yes", there is no need to proceed further.</p>	<p>N/A</p>
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**Worksheet B - Risk Significant Quantities**

(Category 2 Quantities, IAEA Safety Guide No. RS-G-1.9, Categorization of Radioactive Sources, August 2005)

Radionuclide	Risk Significant Quantity (TBq) <sup>1</sup>	Risk Significant Quantity (Ci) <sup>1</sup>	Radionuclide	Risk Significant Quantity (TBq) <sup>1</sup>	Risk Significant Quantity (Ci) <sup>1</sup>
Am-241	0.6	16	Pm-147	400	11,000
Am-241/Be	0.6	16	Pu-238	0.6	16
Cf-252	0.2	5.4	Pu-239/Be	0.6	16
Cm-244	0.5	14	Ra-226 <sup>2</sup>	0.4	11
Co-60	0.3	8.1	Se-75	2	54
Cs-137	1	27	Sr-90 (Y-90)	10	270
Gd-153	10	270	Tm-170	200	5,400
Ir-192	0.8	22	Yb-169	3	81

<sup>1</sup> The primary values are TBq. The curie (Ci) values are for informational purposes only.  
<sup>2</sup> The Atomic Energy Act, as amended by the Energy Policy Act of 2005, authorizes NRC to regulate Ra-226 and NRC is in the process of amending its regulations for discrete sources of Ra-226.

<p>Calculations of the Total Activity or the Unity Rule were completed.  <b>NOTE--If an amendment of an existing license is being requested, the calculations will include the previously authorized quantities for the radionuclide(s).</b></p>	<p>Yes, No, or Not Applicable (NA)</p>
<p>Total Activity--multiple activities are requested for a single radionuclide and the sum of the activities is less than the Risk Significant Quantity (TBq) for the radionuclide.</p>	
<p>Unity Rule--multiple radionuclides are requested and the sum of the ratios is less than 1.0, e.g., [(total activity for radionuclide A) + (risk significant quantity for radionuclide A)] + [(total activity for radionuclide B) + (risk significant quantity for radionuclide B)] &lt; 1.0.</p>	

**Signature and Date for Step 1:**

 APR - 2 2008  
 License Reviewer and Date

APR 4 2008  
DATE

This is to acknowledge the receipt of your letter/application dated 3-13-08, and to inform you that the initial processing, which includes an administrative review, has been performed.

There were no administrative omissions. Your application will be assigned to a technical reviewer. Please note that the technical review may identify additional omissions or require additional information.

Please provide to this office within 30 days of your receipt of this card:

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The action you requested is normally processed within 90 days.

A copy of your action has been forwarded to our License Fee & Accounts Receivable Branch, who will contact you separately if there is a fee issue involved.

Your action has been assigned **Mail Control Number** 471729.  
When calling to inquire about this action, please refer to this mail control number.  
You may call me at 817-860-8103.

Sincerely,

*Colleen Murnahan*

Licensing Assistant

: (FOR LFMS USE)  
: INFORMATION FROM LTS  
: -----  
:  
: Program Code: 03120  
: Status Code: 0  
: Fee Category: 3P  
: Exp. Date: 20130930  
: Fee Comments: \_\_\_\_\_  
: Decom Fin Assur Req'd: N  
: .....

BETWEEN:  
License Fee Management Branch, ARM  
and  
Regional Licensing Sections

LICENSE FEE TRANSMITTAL

A. REGION

1. APPLICATION ATTACHED

Applicant/Licensee: ROXAR, INC.  
Received Date: 20080314  
Docket No: 3036402  
Control No.: 471729  
License No.: 42-27765-01  
Action Type: Amendment

2. FEE ATTACHED

Amount: \_\_\_\_\_  
Check No.:       /      

3. COMMENTS

Signed Colleen Murnahan  
Date 3-20-08

B. LICENSE FEE MANAGEMENT BRANCH (Check when milestone 03 is entered /\_/)

1. Fee Category and Amount: \_\_\_\_\_

2. Correct Fee Paid. Application may be processed for:



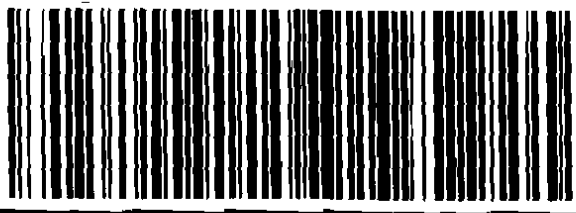

Amendment \_\_\_\_\_  
Renewal \_\_\_\_\_  
License \_\_\_\_\_

3. OTHER \_\_\_\_\_  
\_\_\_\_\_

Signed \_\_\_\_\_  
Date \_\_\_\_\_



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MARIE I BENSON 713-334-2222 CORROCEAN, INC. 3300 WALNUT BEND LANE HOUSTON TX 77042	LTR	1 OF 1
<b>SHIP TO:</b> LICENSING SECTION UNITED STATES NUCLEAR REGULATORY CO SUITE 400 611 RYAN PLAZA DRIVE ARLINGTON TX 76011-4005		
	<b>TX 760 0-10</b> 	
<b>UPS NEXT DAY AIR</b>		<b>1</b>
TRACKING #: 1Z F67 11X 01 9039 4827		
		
BILLING: P/P		
Reference#1: License Number 42-27765-01 Reference#2: Naming of RSO updated 031308		 TM

US 101.06. WSP1E70 75.0A 01/2008