

RADIOGRAPHY LICENSE APPLICATION CHECKLIST

(NUREG-1556, Vol. 2 dated 8/98)

Licensee/Applicant: High Country Fabrication
License Number: 49-29300-01
Docket Number: 030-37748
Control Number: 471784
Date of Application: 4/7/08
Application Signed Yes No

REGULATORY PERFORMANCE:

Review of last three inspections reveals no **major regulatory considerations**.

DATE	INSPECTOR	VIOLATIONS
■		
■		
■		

Major violations/repeat violations:

Reviewer and inspector concerns:

1. LICENSE ACTION TYPE:

NEW RENEWAL AMENDMENT

2. NAME AND MAILING ADDRESS:

Name: High Country Fabrication

Mailing Address: 1000 West 1st Street
Casper, WY 82604

Comment: REVIEWER NOTE:

DO NOT PROCEED WITH THE TECHNICAL REVIEW OF AN APPLICATION UNTIL IT IS SIGNED. A SIGNED TRANSMITTAL LETTER IS ACCEPTABLE. OTHER OBVIOUS OMISSIONS SHOULD BE NOTED AND COMMUNICATED TO THE APPLICANT AT THE SAME TIME AS A REQUEST FOR SIGNATURE.

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NON-RADIOGRAPHY EQUIPMENT			
Radionuclide	Manufacturer (or Distributor) & Model Nos. (Sealed Sources)	Manufacturer (or Distributor) & Model Nos. (Devices)	Maximum possession limit per source (in millicuries); total possession limit (in millicuries)

Item No.	Title and Criteria	Yes	Description Attached
5.	<p>RADIOACTIVE MATERIAL</p> <p>Sealed Sources and Devices</p> <ul style="list-style-type: none"> • Confirm that each sealed source, device, and source/device combination possessed is registered as an approved sealed source or device by NRC or an Agreement State and will be possessed and used in accordance with the conditions specified in the registration certificate. • Confirm that associated equipment is compatible with the exposure devices, source exchangers, and sealed sources containing byproduct material. • Confirm that only radiographic exposure devices, source assemblies or sealed sources, and associated equipment which meet the requirements specified in 10 CFR 34.20 will be used in radiographic operations. 	<p style="text-align: center;">[X]</p> <p style="text-align: center;">[X]</p> <p style="text-align: center;">[X]</p>	

Item No.	Title and Criteria	Yes	Description Attached
5.	<p>RADIOACTIVE MATERIAL</p> <p>Financial Assurance and Recordkeeping for Decommissioning</p>		

Item No.	Title and Criteria	Yes	Description Attached
	<ul style="list-style-type: none"> • Pursuant to 10 CFR 30.35(g), we shall maintain drawings and records important to decommissioning and to transfer these records to a new licensee before licensed activities are transferred, or to assign the records to the appropriate NRC regional office before the license is terminated. <p style="text-align: center;">OR</p> <ul style="list-style-type: none"> • If financial assurance is required, submit evidence. 	[X]	[] N/A
6.	<p>PURPOSE(S) FOR WHICH LICENSED MATERIAL WILL BE USED</p> <p>Equipment will only be used:</p> <ul style="list-style-type: none"> - industrial radiography - underwater radiography - lay-barge radiography - off-shore platform radiography - other than radiography 	[X] [] [] [] []	
7.	<p>INDIVIDUAL(S) RESPONSIBLE FOR RADIATION SAFETY PROGRAM AND THEIR TRAINING EXPERIENCE</p> <p>Radiation Safety Officer (RSO)</p> <ul style="list-style-type: none"> • The name of the proposed RSO and other potential designees who will be responsible for ensuring that the licensee's radiation safety program is implemented in accordance with approved procedures. Name: John Quinn <p style="text-align: center;">AND</p> <ul style="list-style-type: none"> • Demonstrate that the RSO has sufficient independence and direct communication with responsible management officials by providing a copy of an organization chart by position, demonstrating day-to-day oversight of the radiation safety activities. 		[X] [] [X]

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	<p style="text-align: center;">AND EITHER</p> <ul style="list-style-type: none"> • The specific training and experience of the RSO and other potential designees. Include the specific dates of certification and/or training in radiation safety. • Documentation to show that the RSO has a minimum of 2,000 hours of hands-on experience as a qualified radiographer in industrial radiographic operations. • Documentation to show that the RSO has obtained formal training in the establishment and maintenance of a radiation protection program. <p style="text-align: center;">OR</p> <ul style="list-style-type: none"> • Alternative information demonstrating that the proposed RSO is qualified by training and experience. • Documentation to show the RSO has obtained formal training in the establishment and maintenance of a radiation protection program. 		<p style="text-align: center;">[X]</p> <p style="text-align: center;">[X]</p> <p style="text-align: center;">[X]</p> <p style="text-align: center;">[]</p> <p style="text-align: center;">[]</p>
8.	<p>TRAINING FOR RADIOGRAPHERS AND RADIOGRAPHER'S ASSISTANTS</p> <ul style="list-style-type: none"> • Submit an outline of the training to be given to prospective radiographer's assistants. Submit your procedures for experienced radiographers who have worked for another licensee. • Provide a copy of a typical examination and the correct answers to the examination questions. Indicate the passing grade. • Prior to June 27, 1999, you may affirm that all individuals acting as radiographers will be certified in radiation safety in lieu of providing a description of your training and examination program in the topics listed in 10 CFR 34.43(g). (All other training program descriptions must still be submitted.) • Specify the qualifications of your instructors in radiation safety principles and describe their experience with radiography. If training will be conducted by someone outside the applicant's organization, identify the course by title and provide the name and address of the company providing the training. 	<p style="text-align: center;">[]</p>	<p style="text-align: center;">[X]</p> <p style="text-align: center;">[X]</p> <p style="text-align: center;">[]</p> <p style="text-align: center;">[X]</p>

Item No.	Title and Criteria	Yes	Description Attached
	<ul style="list-style-type: none"> The results of radiation-level calculations or actual radiation measurements adjacent to, above, and below the facility. 		[]
9.	<p>FACILITIES AND EQUIPMENT</p> <p>Permanent Radiography Installations</p> <p>Provide the following information to obtain approval for a variance if construction requirements preclude shielding the roof to meet the requirement not to exceed 0.02 mSv (2 mrem) in any one hour:</p> <ul style="list-style-type: none"> Means of access to the roof. Procedures for ensuring that no individual is on the roof or could gain access to the roof during radiography. A commitment that the roof will be posted with "Caution (or Danger) Radiation Area" sign(s). Steps taken to minimize radiation on the roof. Limitations (if needed) on positioning of sources or type (isotope) and amount of radioactive material that may be used in the installation to ensure that areas adjacent to, above, and below the installation will be unrestricted areas during the performance of radiography. 	[]	<p>N/A</p> <p>[]</p> <p>[]</p> <p>[]</p> <p>[]</p>
	<p>Provide the following information to obtain approval for a variance if radiation levels on the radiography installation roof exceed 1.0 mSv (100 mrem) in any one hour:</p> <ul style="list-style-type: none"> A commitment that the roof will be posted with "Caution (or Danger) High Radiation Area" sign(s). Evidence of constant surveillance of the roof by closed-circuit TV. Fluctuation of the dose rate. A description of a control device that would automatically reduce the radiation level to 1 mSv (100 mrem) in any one hour at 30 cm from the radiation source if someone enters the roof. A description of a control device that activates a visible-audible signal so that both an individual entering the roof and the radiographer on duty are made aware of the entry. 	[]	<p>[]</p> <p>[]</p> <p>[]</p> <p>[]</p>
9.	FACILITIES AND EQUIPMENT		

Item No.	Title and Criteria	Yes	Description Attached
	<p>Field Stations</p> <p>Provide the following information for each field station:</p> <ul style="list-style-type: none"> • Describe the storage location(s) at the address(es) listed in Item 3 of the application and submit a diagram showing where the radiography camera will be stored at the field stations. • Indicate whether radiography will be performed at the place of business outside of a permanent facility as if the work was "in the field." • For radiography performed at the place of business as if the work was "in the field," provide a diagram of the location where radiography may be performed and its surroundings, including a description of adjacent property. 	<p>[X]</p> <p>[X]</p> <p>[X]</p>	<p>[X]</p> <p>[X]</p> <p>[X]</p>
10.	<p>RADIATION SAFETY PROGRAM</p> <p>Audit Program</p> <p>The applicant is <u>not</u> required to, and should not, submit its audit program to the NRC for review during the licensing phase.</p>		<p>Need Not Be Submitted With Application</p>
10.	<p>Instruments</p> <p>We will possess and use calibrated and operable radiation survey meters.</p> <p>Calibration will be performed by a NRC or Agreement State licensee specifically authorized to perform instrument calibration.</p> <p>Calibration is to be performed in-house and the model procedures in Appendix J will be followed.</p> <p>Calibration is to be performed in-house and alternate procedures will be followed.</p> <p>Identify the qualifications of the individuals who will perform the calibrations.</p>	<p>[X]</p> <p>[X]</p> <p>[]</p> <p>[]</p> <p>[]</p>	<p>N/A</p> <p>[] N/A</p> <p>[] N/A</p>

Item No.	Title and Criteria	Yes	Description Attached
10.	<p>RADIATION SAFETY PROGRAM</p> <p>Material Receipt and Accountability</p> <p>Physical inventories will be conducted and documented at quarterly intervals (not to exceed 3 months) to account for all sealed sources containing byproduct material and devices containing depleted uranium received and possessed under the license.</p>	[X]	X
	<p>Minimization of Contamination</p> <p>The applicant is <i>not</i> required to provide a response to the minimization of contamination if the applicant's responses meet the criteria for the following sections: "Radioactive Material - Sealed Sources and Devices," "Facilities and Equipment," "Radiation Safety Program - Leak Tests," "Radiation Safety Program - Operating and Emergency Procedures," and "Waste Management - Sealed Source/DU Device Transfer and Disposal."</p>		<p>Need Not Be Submitted With Application</p>
10.	<p>RADIATION SAFETY PROGRAM</p> <p>Leak Tests</p> <p>Leak tests will be performed by an organization authorized by NRC or an Agreement State to provide leak testing services to other licensees; or by using a leak test kit supplied by an organization licensed by NRC or an Agreement State to provide leak test kits and/or services to other licensees and according to the instructions provided in the leak test kit.</p> <p style="text-align: center;">OR</p> <p>Leak testing will be done by the applicant.</p> <ul style="list-style-type: none"> ● The information in Appendix K supporting a request to perform leak testing and sample analysis is attached. ● We will follow the model procedures in Appendix K. ● We will follow alternate procedures. 	<p>[X]</p> <p>[]</p> <p>[]</p>	<p>N/A</p> <p>[]</p> <p>[]</p>
10.	<p>Occupational Dosimetry</p>		

Item No.	Title and Criteria	Yes	Description Attached
	<p>Film or TLD dosimetry, processed and evaluated by a NVLAP-accredited processor and exchanged at the required frequency, will be worn by radiography personnel.</p> <p>The required personnel monitoring equipment, including 0 to 2 mSv (200 mrem) dosimeters or electronic personal dosimeters, will be worn by radiographic personnel.</p> <p>Alarming rate meters set to alarm @ $\pm 20\%$ of 500 mrem/hour will be worn by all radiography personnel except those at permanent radiography installations where other appropriate alarming or warning devices are in use.</p> <p>Pocket dosimeters and alarm rate meters will be checked for correct response at periods not to exceed 12 months.</p> <ul style="list-style-type: none"> • If adjustment is necessary, the devices will be returned to the manufacturer. • If adjustment is necessary, in-house procedures for adjustments are described. 	<p>[X]</p> <p>[X]</p> <p>[X]</p> <p>[X]</p> <p>[X]</p>	<p>[X]</p>
10.	<p>RADIATION SAFETY PROGRAM</p> <p>Public Dose</p> <p>The applicant is <u>not</u> required to, and should not, submit a response to the public dose section during the licensing phase. This matter will be inspected during an inspection.</p>		<p>Need Not Be Submitted With Application</p>
10.	<p>Quarterly Maintenance</p> <p>Submit the procedures to NRC for review and approval as Operating and Emergency Procedures and/or as Shipping Package Procedures as needed.</p> <p>Before using a new sealed source/device combination, we will have written inspection and maintenance procedures that address the use of the new equipment as a Type B transport package. In addition, we will provide training to radiographic personnel before using a new sealed source/device combination.</p>	<p>[X]</p>	<p>[X]</p>
10.	<p>Operating and Emergency Procedures</p>		

Item No.	Title and Criteria	Yes	Description Attached
	<p>Handling and Use of Sealed Sources and Radiography Exposure Devices</p> <p>Submit operating and emergency procedures which provide step-by-step instructions for using each type of radiographic device. Instructions for crank out devices should be separate from those for pipeliner devices.</p> <p>Submit operating and emergency procedures which provide instructions for performing source exchanges.</p>		<p>[x]</p> <p>[x]</p>
10.	<p>Methods and Occasions for Conducting Radiation Surveys</p> <p>Submit operating and emergency procedures which, where applicable, include each of the surveys included in Table 8.1</p>		[x]
10.	<p>Operating and Emergency Procedures</p> <p>Methods for Controlling Access to Radiographic Areas</p> <p>Submit the procedures to control access to radiographic operations and storage areas.</p>		[x]
10.	<p>Methods and Occasions for Locking and Securing Radiographic Exposure Devices, Storage Containers, and Sealed Sources</p> <p>Submit operating and emergency procedures that include procedures for locking and securing radiographic equipment.</p>		[x]
10.	<p>Personnel Monitoring and the Use of Personnel Monitoring Equipment</p> <p>Submit operating procedures that include instructions for proper use of personnel monitoring equipment.</p>		[x]
10.	<p>Transporting Sealed Sources to Field Locations, Securing Exposure Devices and Storage Containers in Vehicles, Posting Vehicles, and</p>		

Item No.	Title and Criteria	Yes	Description Attached
	<p>Controlling Sealed Sources During Transportation</p> <p>Submit operating and emergency procedures for transporting sealed sources containing byproduct material, exposure devices, and source exchangers.</p>		[x]
10.	<p>Daily Inspection and Maintenance of Radiographic Equipment</p> <p>Submit operating and emergency procedures for daily inspection and maintenance of radiographic equipment.</p>		[x]
10.	<p>Operating and Emergency Procedures</p> <p>Rate Meter Alarms or Off-scale Dosimeter Readings</p> <p>Submit operating and emergency procedures to address rate meter alarms or off-scale dosimeters.</p>		[x]
10.	<p>Procedure for Identifying and Reporting Defects and Non-compliance as Required by 10 Cfr Part 21</p> <p>Submit operating and emergency procedures for notifying management of equipment malfunction or defect.</p>		[x]
10.	<p>Notification of Proper Persons in the Event of an Accident</p> <p>Submit operating and emergency procedures that include appropriate instructions for notifying the RSO and/or other personnel in the event of an emergency.</p>		[X]
10.	<p>Minimizing Exposure of Persons in the Event of an Accident--Emergency Procedures</p> <p>Submit operating and emergency procedures that include instructions for minimizing exposure of persons in the event of an accident.</p>		[X]

Item No.	Title and Criteria	Yes	Description Attached
10.	<p>Source Retrieval</p> <p>We will <u>not</u> perform source retrievals and will use the services of a person specifically licensed by the NRC or an Agreement State to perform the retrievals of our sources.</p> <p>Submit operating and emergency procedures that include instructions for source retrieval procedures and specific training.</p>	[X]	[] N/A
10.	<p>Operating and Emergency Procedures</p> <p>Maintenance of Records</p> <p>Submit operating and emergency procedures which ensure proper maintenance of records.</p>		[X]
11.	<p>WASTE MANAGEMENT</p> <p>Disposal or Transfer of Radiography Sealed Sources Containing Byproduct Material or Devices Containing Depleted Uranium</p> <p>The applicant does <u>not</u> need to provide a response to this item during the licensing process. However, the applicant should establish and include waste disposal procedures in its radiation safety program.</p>		Need Not Be Submitted With Application

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June 11, 2008

James L. Montgomery, Health Physicist