



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
REGION IV  
612 EAST LAMAR BLVD, SUITE 400  
ARLINGTON, TEXAS 76011-4125

**FACSIMILE FORM**

DATE: August 21, 2008

MESSAGE TO: **Najam H. Tariq, RSO**

Docket No. 030-37769  
License No. 02-29109-02  
Control No. 471834

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

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SPECIAL INSTRUCTION/ ATTACHMENTS:

The purpose of this facsimile is to document the deficiencies identified in the license application. Please respond to this fax at your earliest convenience so that I may continue with the review of your license application.

The fax number is (817) 860-8263 and my email is [rachel.browder@nrc.gov](mailto:rachel.browder@nrc.gov). If you have any questions regarding our discussion or this fax, please contact me at (817) 276-6552. When responding to this fax, please include the license, docket and control numbers, located at the top of this page. Thank you.

Rachel S. Browder  
Health Physicist

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Deficiencies

1. The NRC recognizes that Mr. Najam H. Tariq is qualified as the logging supervisor under the NRC regulations. However, as part of the license application, please submit procedures that address the training requirements in 10 CFR 39.61 for logging supervisors and logging assistants. You may find the guidance provided in NUREG-1556, Volume 14, Appendix L, helpful in preparing your response.

In particular, please include the following items:

- a. Specify the subjects to be covered in the classroom training.
  - b. Provide a commitment to provide copies of the required documents and regulations.
  - c. Describe training in the radiation detection instruments and equipment to be used as part of the field evaluation.
  - d. Describe the On-the-Job Training and minimum number of hours for logging supervisors and logging assistants.
  - e. Provide a copy of a typical examination, the correct answers to the examination questions, and the passing grade.
  - f. Describe the annual refresher training program, including topics to be covered and how the training will be conducted.
2. Provide a description of the program for annual inspections of the job performance of each logging supervisor. This should include a discussion of management action, commitment that the inspections are conducted on-the-job and unannounced, and a commitment that an individual who has not performed logging for more than 1 year will be inspected the first time that person engages in logging operations.
  3. Please provide a commitment to perform an annual audit of the radiation safety program. [Note: You may find the guidance provided in NUREG-1556, Volume 14, Appendix G, helpful in conducting your annual audit.]
  4. Please provide the types of radiation survey instruments available. Please indicate the range of the survey instrument(s). Please provide the calibration frequency of the survey instrument(s) and a commitment that it will be calibrated after instrument servicing. In addition, document the name of the company that performs the calibration service in your response.
  5. Please provide a commitment to conduct a physical inventory every 6 months. Please include a copy of your inventory sheet to indicate the information required as part of the inventory record.
  6. Please provide the following elements as part of your Operating and Emergency procedures.
    - a. Handling of sealed sources in wells without surface casing for protecting fresh water aquifers
    - b. Instructions for maintaining security during storage, transportation and while at the job-site.
    - c. When surveys are conducted, including surveys for detecting contamination, as required

- by 10 CFR 39.67.
- d. Describe transportation procedures, including packaging of licensed material for transport in vehicles, placarding vehicles when needed, physically securing licensed material in transport vehicles during transportation to prevent accidental loss, tampering, or unauthorized removal.
  - e. Procedures for picking up, receiving, and opening packages containing licensed materials in accordance with 10 CFR 20.1906.
  - f. The steps for the use of the sealed source and logging tool was provided; however, please provide the steps for the inspection and maintenance of the sealed source and logging tool as required by 10 CFR 39.43.
7. Please commit that you will not remove, open, repair, modify or perform maintenance on the sealed source in the source holder. Please specify that these services will either be performed by the manufacturer, licensed equipment manufacturer or a licensed entity. If you want to perform any of these licensed activities, then please submit your procedures for the respective activity.
  8. Please clarify whether you conduct drill-to-stop operations or logging while drilling operations. Please provide an outline of the steps in the operation that address important aspects of the O&E procedures.
  9. Please submit elements of your well owner/operator agreement which includes the following:
    - a. Reasonable effort will be made to recover the source.
    - b. A person will not attempt to recover a lodged sealed source in a manner which, in the licensee's opinion, could result in its rupture.
    - c. Radiation monitoring will be conducted during recovery operations.
    - d. Contaminated equipment, personnel, or environment will be decontaminated.
  10. Please include "shielding" as the third element of ALARA in your O&E procedure, under "Over Exposure To The Gamma Source."
  11. Please provide the specific physical address of the storage area.
  12. Please provide an organization chart showing the relationship of the Department of Water resources to the Radiation Safety Officer.
  13. Please provide handling and disposal of waste materials under your waste management procedures.