

March 30, 2009

U.S. Nuclear Regulatory Commission – Region IV
Division of Nuclear Materials Safety
Nuclear Materials Safety Branch B
612 East Lamar Boulevard, Suite 400
Arlington, TX 76011-4125

Attn.: Roberto J. Torres

Re: Radioactive Materials License Application (control no. 472108)

Dear Mr. Torres:

Attached is the additional information you requested in regards to the application for our Radioactive Materials License.

1. We will implement and maintain the Operating, Emergency, and Security Procedures in the errata sheet to Appendix H of NUREG-1556, Volume 1, Revision 1, and provide copies of these procedures to all gauge users and at each job site.

Appendix H has been added to our Radiation Safety Program document RAS001. The appropriate referenced have been added to emergency procedures and shipping documents. Refer to the attached highlighted entries. Appendix H has also been added to all accompanying documents that the users maintain in their possession.

2. Our Iowa license authorizes a total of 5 Humboldt Portable Gauges and 22 Troxler Portable Gauges (see page 2 of attached license). We would like these included on our NRC license as well.

If you have any questions or if you need anything else, please do not hesitate to contact us.

Sincerely,
TEAM Services



Jeffrey Roberts
Radiation Safety Officer

EMERGENCY PROCEDURES:

The emergency action plan applies to the following materials:

Nuclear Compaction Control Gauges

The emergency action plan applies to the following materials: Nuclear Compaction Control Gauges
Emergency action plan in the event of:

Damage: If the source fails to return to the shielded position or if any other emergency or unusual situation arises, such as the gauge being struck by a moving vehicle, dropped, or in a vehicle involved in an accident:

1. Immediately secure the area around the gauge – at least 15 feet.
2. Prevent unauthorized personnel from entering the secured area.
3. If any heavy equipment is involved, detain the equipment until it is determined that there is no contamination present.
4. Notify the Radiation Safety Officer (RSO), Jeff Roberts, at 515-282-8818, 800-886-8326, 515-250-5406 or 515-225-7696.
5. Follow the directions provided by the RSO.

Fire:

1. Do not move the damaged container. If possible, move un-damaged containers out of the fire zone.
2. Immediately contact the local Fire Department and the RSO.

Theft or Loss:

1. Immediately contact the local Department of Public Health and the RSO.

The RSO shall:

- a. When damaged, arrange for a survey to be conducted using an appropriate radiation detection instrument as soon as possible by an approved person.
- b. Make necessary notifications to local authorities:

Iowa: notify the IDPH at 515-281-3478.

North Dakota: contact The North Dakota Health Department (NDHD) at 701-328-5188, Fire Dept. at 701-258-5792 and Police Dept. at 701-223-1212.

Illinois: notify the Illinois Emergency Management Agency (IEMA) at 217-782-7860.

NRC: call NRC's Emergency Operations Center at (301) 816-5100, which is staffed 24 hours a day and accepts collect calls.

Notification is required when gauges are lost or stolen, or damaged or involved in incidents that result in doses in excess of the dose limits in Chapter 40.

- c. Ensure reports to the IDPH, NDHD, IEMA or NRC are submitted in a timely manner.
- d. Review and adhere to the reporting requirements of 40.95, 40.96, and 40.97 (or refer to NRC NUREG Appendix H when applicable).

Reference: Excerpt from form RAS001 "Radiation Safety Program"

RADIATION SAFETY PROGRAM

Ref: Iowa Dept. of Public Health (IDPH) "Portable Gauge Device Regulation Guide", Section 11
IL Emergency Management Agency IEMA - Instructional Set 65 (Use of Sealed Sources in Portable Devices)
NRC NUREG – 1556 Vol. 1, Rev. 1 w/App H Errata

ITEM 11. – RADTATION SAFETY PROGRAM

TEAM Services is responsible for the conduct of the radiation safety program and for all actions of our employees.

11.1. – PERSONNEL MONITORING EQUIPMENT

All personnel handling nuclear gauges shall wear a thermoluminescent dosimeter (TLD) when they use the device. The TLD's are distributed and analyzed by:

Global Dosimetry Solutions, Inc.
(Formerly ICN Dosimetry Service)
3300 Hyland Avenue
Costa Mesa, CA 92626

The TLD's are exchanged every (3) months.
Personnel exposed on an occasional basis will not normally be issued exposure monitors.

11.2. – RADIATION DETECTION INSTRUMENTS

TEAM Services makes a commitment that personnel will wear a TLD during all handling of the nuclear gauges, and that we will perform no servicing that requires removal of the source from its shielded position or removal of the source rod from the gauging device.

Therefore a radiation survey meter will not be used during routine use and maintenance. If warranted, a survey meter is provided by contacting the IDPH at 515-281-3478.

11.3. – LEAK TESTING

TEAM Services shall perform according to 641-40.32(2). We shall perform tests to determine whether or not there is any leakage from the radioactive source in the device. The leak test shall be performed at 6-month intervals.

The leak testing procedure shall be:

Use a commercial leak-test kit. Take the smear and send the smear to the kit supplier, who reports the results to us.

The Test Kit supplier and analyzer shall be one of the following:

Humboldt Scientific 331-D Pylon Drive Raleigh, NC 27606 NC DENR License No. 092-0750-1	Troxler Electronic Laboratories 3008 Cornwallis Road Research Triangle Park, NC 27709	Aguinaga Technical Services 1924-C Calumet Drive Sheboygan, WI 53081	Qal-Tek Associates 101 Technology Drive Idaho Falls, ID 83401
---	---	--	---

PROCEDURE FOR TAKING TEST SAMPLES

1. Make a list of all sources to be tested and prepare the leak test form including the isotope, the activity on a specified date, and the physical form.
2. The sources tested shall not be stronger than a few millicuries. Wear a dosimeter during testing.
3. Prepare a separate wipe sample for each source. A cotton swab, injection prep pad, filter paper, or tissue paper is suitable. Number each wipe so you will know for which source it is to be used. Samples should be taken as follows: for nuclear gauges with small sealed sources, wipe the entire accessible surface area. Pay particular attention to seams and joints.

EMERGENCY PROCEDURES:

The emergency action plan applies to the following materials: Nuclear Compaction Control Gauges
Emergency action plan in the event of:

Damage: If the source fails to return to the shielded position or if any other emergency or unusual situation arises, such as the gauge being struck by a moving vehicle, dropped, or in a vehicle involved in an accident:

1. Immediately secure the area around the gauge – at least 15 feet.
2. Prevent unauthorized personnel from entering the secured area.
3. If any heavy equipment is involved, detain the equipment until it is determined that there is no contamination present.
4. Notify the Radiation Safety Officer (RSO), Jeff Roberts, at 515-282-8818, 800-886-8326, 515-250-5406 or 515-225-7696.
5. Follow the directions provided by the RSO.

Fire:

1. Do not move the damaged container. If possible, move un-damaged containers out of the fire zone.
2. Immediately contact the local Fire Department and the RSO.

Theft or Loss:

1. Immediately contact the local Department of Public Health and the RSO.

The RSO shall:

- a. When damaged, arrange for a survey to be conducted using an appropriate radiation detection instrument as soon as possible by an approved person.
- b. Make necessary notifications to local authorities:

Iowa: notify the IDPH at 515-281-3478.

North Dakota: contact The North Dakota Health Department (NDHD) at 701-328-5188, Fire Dept. at 701-258-5792 and Police Dept. at 701-223-1212.

Illinois: notify the Illinois Emergency Management Agency (IEMA) at 217-782-7860.

NRC: call NRC's Emergency Operations Center at (301) 816-5100, which is staffed 24 hours a day and accepts collect calls.

Notification is required when gauges are lost or stolen, or damaged or involved in incidents that result in doses in excess of the dose limits in Chapter 40.

c. Ensure reports to the IDPH, NDHD, IEMA or NRC are submitted in a timely manner.

d. Review and adhere to the reporting requirements of 40.95, 40.96, and 40.97 (or refer to NRC NUREG Appendix H when applicable).

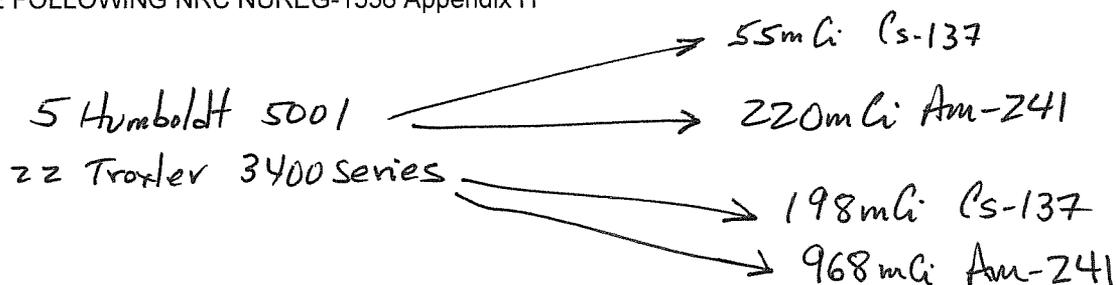
11.7. – INVENTORIES

Physical inventories shall be conducted at intervals not to exceed six (6) months, and inventory checks performed daily, to account for all sealed sources and gauges received and possessed under your license. Records of the inventories are permanently maintained in the company database. The records shall include a reference to the manufacturer who can supply the radionuclide and amount of material in each source, the model number and serial number of each gauge, the location of each gauge, and the date of the inventory. Stability tests are performed every (6) months and are evidence of the gauges presence. Gauges shall be stored in an authorized identified by the appropriate radiation and occupational signage. The area shall be accessible by authorized users only.

New storage areas and/or new facilities shall be approved by the appropriate authority before gauges are stored in the new area. Gauges shall not be stored in the new area until the approval/license amendment is received.

7. Be immediately available to serve as a point of contact with the Agency and give assistance in case of emergency (e.g., portable device damage, fire, theft, etc.).
8. Assure that the Radiation Protection Program is implemented and reviews are performed in accordance with the regulations.
9. Assure that the proper authorities (i.e., IDNS, local police, U.S. Dept. of Transportation, etc.) are notified promptly in case of accident, damage, theft or loss of the portable devices.
10. Assure that portable devices are properly secured against unauthorized removal at all times when they are not in use, including storage at temporary job sites.
11. Assure that the terms and conditions of the license (e.g., periodic leak/wipe tests, inventories, etc.) are met and that the required records (e.g., personnel exposure, leak/wipe test, accountability, inventory, etc.) are maintained and periodically reviewed for compliance with IDNS regulations and license conditions.
12. Assure that the portable devices are transported in compliance with all applicable U.S. Department of Transportation regulations (e.g., labeling, marking, shipping papers, container blocking and bracing, etc.).

REFERENCE FOLLOWING NRC NUREG-1556 Appendix H



RIS
2005-31

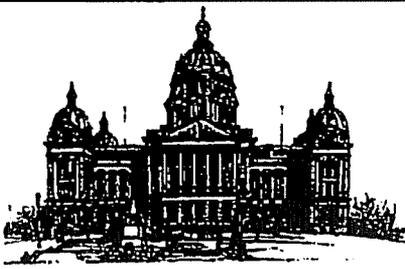
$$\frac{0.253 \text{ Ci}}{2.7 \text{ Ci}} + \frac{1.188 \text{ Ci}}{1.6 \text{ Ci}} < 1$$

$$0.0937 + 0.7425 < 1$$

$$\boxed{0.8362 < 1}$$

License can be made publicly available
 as per NRC Regulatory Issue Summary
 2005-31.

RITZ 3-30-09



STATE CAPITOL OF IOWA DES MOINES, IOWA

MATERIALS LICENSE

Supplementary Sheet

License No.: 0244-1-77-PG

8. AUTHORIZED USE

A. & B. To be used in Humboldt Model 5001 Portable Moisture and Density Gauge. The licensee is authorized for five (5) devices.

C. & D. To be used in Troxler Model 3411B, 3430, or 3440 Portable Moisture and Density Gauge. The licensee is authorized for twenty-two (22) devices.

CONDITIONS

9. Licensed material may be used or stored at the licensee's facilities located at 260-C 33rd Avenue, SW, Cedar Rapids, Iowa; 717 SE 6th Street, Des Moines, Iowa; 3424 ½ 5th Avenue South, Fort Dodge, Iowa; 133 Brown Avenue, Evansdale, Iowa; 16 8th Street Southeast, Mason City, Iowa; 1958 West River Drive, Suite A, Davenport, Iowa; 25411 1st Street, Spirit Lake, Iowa; and used at temporary job sites of the licensee anywhere in the State of Iowa where the Iowa Department of Public Health maintains jurisdiction for regulating the use of licensed material.
10. Licensed material shall only be used by, or under the supervision and in the physical presence of, Jeff Roberts or individuals, who have successfully completed a manufacturer's training program for gauge users, have been instructed in the licensee's routine and emergency operating procedures and who have been designated by the Radiation Safety Officer. The licensee shall maintain records of individuals designated as users for five (5) years following the last use of licensed material.
11. The Radiation Safety Officer for licensed activities is Jeffrey J. Roberts.
12. When performing tests at temporary job sites, the authorized user shall not leave the nuclear gauge unattended. Upon completion of tests, the device shall be secured in the licensee's vehicle or a secure building to prevent loss, theft, or unauthorized use.
13. Any cleaning, maintenance, or repair of the gauge(s) that requires removal of the source rod shall be performed only by the manufacturer or by other persons specifically licensed by the U.S. Nuclear Regulatory Commission or an Agreement State to perform such services.
14. Each portable nuclear gauge shall have a lock or outer locked container designed to prevent unauthorized or accidental removal of the sealed source from its shielded position. The gauge or its container must be locked when in transport, storage or when not under the direct surveillance of an authorized user.
15. The licensee is authorized to transport licensed material only in accordance with the provisions of 641-39.5(136C), "Packaging and Transportation of Radioactive Material."

RobertoJ Torres

From: Jeffrey Roberts [jeff@teamsvcs.com]
Sent: Monday, March 30, 2009 11:19 AM
To: RobertoJ Torres
Cc: Shelley Miller
Subject: Re: Request for additional information from U.S. NRC
Attachments: NRC Response.pdf

Mr. Torres:

Refer to the attached response to the following items.

Thank you.

Jeff Roberts
TEAM Services

----- Original Message -----

From: RobertoJ Torres
To: jeff@teamsvcs.com
Sent: Monday, March 30, 2009 8:30 AM
Subject: Request for additional information from U.S. NRC

Mr. Roberts:

I have completed the review of Team Services, Inc., application for a new NRC portable gauge license. Please provide the following answers to the questions so I can issue the license.

1. In your application for a new license you committed to implement and maintain the Operating and Emergency procedures in Appendix H of NUREG-1556, Volume 1, revision 1. Appendix H has been revised and it is now called "Operating, Emergency and Security Procedures (see attached App H NUREG 1556 Vol 1-errata.pdf) to adopt the two independent physical controls to secure portable gauges from unauthorized removal, whenever portable gauges are not under the control and constant surveillance of the licensee" (i.e., when not in use). Therefore I need from you a commitment to follow revised Appendix H.

Commit to the following language: "We will implement and maintain the "Operating, Emergency, and Security Procedures" in the errata sheet to Appendix H of NUREG-1556, Volume 1, Revision 1, and provide copies of these procedures to all gauge users and at each job site."

2. The State of Iowa license issued to Team Services, Inc., authorizes 1 Humboldt 5001 portable gauge, 1 Troxler 3411B portable gauge, and 1 Troxler 3430 portable gauge. The NRC license will have the same authorization (3 portable gauges total). Please confirm that this is the authorization that you want in the NRC license.

Please provide your response in letter (in company letterhead), dated and signed, and submit by reply email as a pdf file or by return facsimile to 817-860-8263.

Thank you.

Roberto J. Torres
Senior Health Physicist
U.S. Nuclear Regulatory Commission - Region IV
Division of Nuclear Materials Safety
Nuclear Materials Safety Branch B

612 East Lamar Boulevard, Suite 400
Arlington, Texas 76011-4125
Telephone 817-860-8189
Facsimile 817-860-8263
robertoj.torres@nrc.gov