

UNITED STATES NUCLEAR REGULATORY COMMISSION REGION IV 612 EAST LAMAR BLVD, SUITE 400

ARLINGTON, TEXAS 76011-4125

September 23, 2009

WeldSonix, Inc. ATTN: Harold T. Holton Radiation Safety Officer 8401 W. Monroe Houston, TX 77061

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION REGARDING LICENSE APPLICATION DATED JULY 2, 2009, CONTROL NUMBER 472301

Dear Mr. Holton,

We have received the subject license application for your radiography activities at temporary jobsites in NRC jurisdiction. In order to continue our review of the subject license application, please provide a response to the following request for additional information. We request that this information be provided by Monday, September 28, 2009. If you can not provide this information by this date, please contact me so that we can discuss another timeframe.

If there are any questions regarding this request, please contact me on my work cell at 817-313-4261.

In accordance with 10 CFR 2.390 of the NRC "Rules of Practice," a copy of this letter will be available electronically for public inspection in the NRC Public Document Room or from the NRC document system (ADAMS). ADAMS is accessible from the NRC Web site at http://www.nrc.gov/reading-rm/adams.html.

Thank you for your cooperation.

Sincerely,

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

Docket: 030-38064 License: 42-29354-01 Control: 472301

Enclosure:

1. Request for Additional Information

Request for Additional Information

1.	Section 4.1.2	Training needs to include a reference to Part 34 of NRC regulations.
2.	Section 4.1.3	Training need to include reference to Part 34 of NRC regulations. The Radiographer Trainee (Radiographer's Assistant) is required to take a closed book test with a passing grade of 80%, in lieu of 70%.
3.	Section 4.1.4	Please include the element "Daily Inspections" as part of the practical training and test.
4.	Section 4.1	Confirm "trainee" is equivalent to Radiographer's Assistant.
5.	Section 4.2.2	Radiographer training is a minimum of 2 months or 320 hours with radioactive material, in lieu of 200 hours. In addition, X-ray machine use and training is not an acceptable pathway for qualification as a Radiographer.
6.	Section 4.4	Commit to ensuring that the RSO will receive formal training in the establishment and maintenance of a radiation protection program.
7.	,	Please provide a copy of a sample test with answers for Radiographer and Radiographer Trainee.
8.		Confirm that radiographic equipment that is stored at temporary jobsites will be secured at a location that prevents access by unauthorized personnel and storage equipments will be observed.
9.	Section 5.5	Training records shall also include the 6-month observation and all training records shall be retained for 3 years.
10.		How do you verify that a Radiographer's certification remains valid?
11.		Please commit that all records as specified in 10 CFR Part 34, Subpart E, <i>Recordkeeping Requirements</i> will be maintained as required by the regulations, which typically is for 3 years in lieu of 2 years as documented throughout the O&E procedure.
12.	House M	Please commit that the 2 individuals (e.g., Radiographers or Radiographer Trainer and Radiographer Trainee) will maintain visual c ontact with one another during operation of a radiographic exposure device.
13.	Section 20.3 and A	
14.	ATT K, 1.7	This section should reference Attachment L for Emergency Procedures in lieu of Attachment J.

Request for Additional Information

15.	ATT K	Please commit that any person handling or involved with packages for transport is hazmat qualified.
16.	ATT K, 3.5	Please commit to following the requirements in 10 CFR 20.1906 for receiving and opening packages.
17.	ATT K	Please commit to registering with the NRC as user for Type B Certificates of Compliance which are used by WeldSonix, Inc.
18.		Please commit to following the requirements in 10 CFR 20.2206 for submitting annual exposure reports to the NRC through the REIRS database, on or before April 30 of each year. The annual exposure report may include exposures received while working in Agreement States, if it is easier to submit exposure records for the entire year in lieu of exposure records for just NRC jurisdictional sites.
19.		Please commit to implementing 10 CFR Part 21 reporting requirement to the NRC Operations Center at 301-816-5100, when a piece of equipment contains a defect, or a failure has occurred, which could create a substantial safety hazard.
20.		Do you want to authorize Source Retrieval under the NRC License or use the authorization on your Texas Radioactive Materials License? If you would like to have the authorization on the NRC license, then please submit your source retrieval procedures. This may also be added later as an amendment to your license.