



Roy Holm, PE & LS
Paul Blough, LS

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DNMS

HOLM, BLOUGH and COMPANY

CONSULTING ENGINEERS AND LAND SURVEYORS
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(307) 587-6281
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December 3, 2009

United States Nuclear Regulatory Commission
Region IV
Attn: Mrs. Jacqueline D. Cook
612 East Lamar Blvd, Suite 400
Arlington, TX 76011-4125

**Responses to Deficiency Items Noted – 12/02/09
Radioactive Materials License Dated 08/27/09 – Holm, Blough and Company**

Mrs. Cook:

The following information is intended to address the deficiency items provided yesterday based on your review of our radioactive materials license. Your questions are provided in bold face italics followed by our responses for your use, review, and reference.

1. ***Please provide either of the following:***

- ***A statement that: "Physical inventories will be conducted at intervals not to exceed 6 months to account for all sealed sources and devices received and possessed under the license.";***

OR

- ***A description of the frequency and procedures for ensuring that no gauge has been lost, stolen, or misplaced and that, if the licensee possesses gauges exceeding threshold amounts, the licensee complies with financial assurance requirements in 10 CFR 30.35.***

Holm, Blough and Company (HBCO) will conduct physical inventories at intervals not to exceed 6 months to account for all sealed sources and devices received and processed under the license.

2. ***Please provide either of the following:***

- ***A statement that: "Either we will maintain, for inspection by NRC, documentation demonstrating that unmonitored individuals are not likely to receive, in one year, a radiation dose in excess of 10 percent of the allowable limits in 10 CFR Part 20, or we will provide dosimetry processed and evaluated by an NVLAP-approved processor that is exchanged at a frequency recommended by the processor.""***

OR

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- ***A description of an alternative method for demonstrating compliance with the referenced regulations.*** **DNMS**

HBCO will either maintain, for inspection by NRC, documentation demonstrating that unmonitored individuals are not likely to receive, in one year, a radiation dose in excess of 10 percent of the allowable limits in 10 CFR Part 20, or we will provide dosimetry processed and evaluated by an NVLAP-approved processor that is exchanged at a frequency recommended by the processor.

3. For routine cleaning and lubrication, please submit either of the following:

- ***A statement that: "We will implement and maintain procedures for routine maintenance of our gauges according to each manufacturer's recommendations and instructions."***

OR

- ***Alternative procedures for NRC review.***

HBCO will implement and maintain procedures for routine maintenance of our gauges according to each manufacturer's recommendations and instructions.

4. For non-routine maintenance or repair operations that require detaching the source or source rod from the gauge, please submit either of the following:

- ***A statement that: "We will send the gauge to the manufacturer or other person authorized by NRC or an Agreement State to perform non-routine maintenance or repair operations that require detaching the source or source rod from the gauge."***

OR

- ***The information listed in NUREG-1556, Vol. 1, Rev. 1, Appendix G supporting a request to perform this work in-house.***

HBCO will send the gauge to the manufacturer or other person authorized by NRC or an Agreement State to perform non-routine maintenance or repair operations that require detaching the source or source rod from the gauge.

On behalf of HBCO, I sincerely appreciate your cooperation and attention in processing this application request. Please feel free to call or email me with any additional questions or if you need additional information.

Sincerely,



Brian Edwards, P.E. – Radiation Safety Officer

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

: (FOR LFMS USE)
: INFORMATION FROM LTS
: -----
:
: Program Code: 03121
: Status Code: 4
: Fee Category: _____
: Exp. Date: 0
: Fee Comments: _____
: Decom Fin Assur Req'd: _____
:

LICENSE FEE TRANSMITTAL

A. REGION

1. APPLICATION ATTACHED
Applicant/Licensee: HOLM, BLOUGH AND COMPANY
Received Date: 20091204
Docket No: 3038135
Control No.: 472519
License No.:
Action Type: New Licensee

2. FEE ATTACHED

Amount: _____
Check No.: _____

3. COMMENTS

Signed *Colleen Murnahan*
Date 12-18-09

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 _____

ACCEPTANCE REVIEW MEMO (ARM)

Licensee: Holm, Blough and Company **License:** 49-29361-01
Docket: 030-38135 **Mail Control:** 472519
Type of Action: New License **Date of Requested Action:** 12/3/09
Reviewer Assigned: **ARM reviewer(s):** Torres

Response	Deficiencies Noted During Acceptance Review
	[] Open ended possession limits. Submit inventory. Limit possession. [] Submit copies of latest leak test results. [] Add IC L.C./Fingerprint LC, add SUNSI markings to license. [] Confirm with licensee if they have NARM material. [] Change of contact information (RSO), send request to update IC database.

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 [suite #, bldg. #, location different from mailing address] (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

Branch Chief's and/or HP's Initials: RIT **Date:** 12-27-09