

**From:** Simmons, Michelle  
**Sent:** Wednesday, November 03, 2010 8:28 AM  
**To:** 'jrojas@cqceng.com'  
**Subject:** CQC Testing and Engineering Deficiency Letter Mail Control Number 573619

Docket Number: 03038378  
License Number: 42-29412-01  
Mail Control Number: 573619

Mr. Rogas,

This is in reference to your application dated September 13, 2010 requesting Nuclear Regulatory Commission License No. 42-29412-01. In order to continue our review, we need the following additional information.

Please commit to the following statements for the use of your portable gauges:

1. 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.
2. a. We will implement and maintain the operating, emergency and **security procedures** described in the errata sheet to Appendix H of NUREG-1556, Vol. 1, Rev. 1, dated November 2001, and provide copies of these procedures to all gauge users and at each job site (<http://www.nrc.gov/reading-rm/doc-collections/nureqs/staff/sr1556/v1/r1/apph-errata.pdf>); or  
b. Operating, emergency and **security procedures** will be developed, implemented, and maintained and will meet the criteria in the section entitled "Radiation Safety Program - Operating and Emergency Procedures" in NUREG-1556, Vol. 1, Rev. 1, dated November 2001.
3. We will implement and maintain procedures for routine maintenance of our gauges according to each manufacturer's recommendations and instructions.
4. 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 the removal of the source or source rod from the gauge.
5. Leak tests will be performed at intervals approved by NRC or an Agreement State and specified in the Sealed Source and Device Registration Sheet. Leak tests will be performed by an organization authorized by NRC or an Agreement State to provide leak testing services for other licensees or using a leak test kit supplied by an organization authorized by NRC or an Agreement State to provide leak test kits to other licensees and according to the kit supplier's instructions.

6. We will either possess and use, or have access to and use, a radiation survey meter that meets the Criteria in the section entitled "Radiation Safety Program – Instruments" in NUREG-1556, Vol. 1, Rev. 1, dated November 2001.
  
7. Please explain how you will meet the requirements of 10 CFR 30.34(i) - two tangible physical controls, during and after working hours.

**Please respond to this email by November 17, 2010.** If you are unable to respond by this due date, please don't hesitate to contact me so we can discuss an extension to the date. Our fax number is (817) 860-8263. You may respond by email in pdf format if you'd like to [michelle.simmons@nrc.gov](mailto:michelle.simmons@nrc.gov). If you have any questions regarding this fax, please call me at 817-276-6590. When responding to this email, please include the license, docket and control numbers located at the top of this page.

Thanking you in advance for your cooperation, assistance, and prompt response in this matter.

Michelle Simmons