**From:** Torres, RobertoJ
**Sent:** Tuesday, January 04, 2011 3:10 PM
**To:** 'rossthompson@pruhscorp.com'
**Cc:** Razo, Jason; Gaines, Anthony; Whitten, Jack
**Subject:** NRC license information
**Attachments:** NRC526 Small Entity Certificate.pdf; nrc313.pdf; NUREG1556v1r1.pdf; App H NUREG 1556 Vol 1-errata.pdf; nrc 629.pdf

Mr. Ross Thompson:

Thank you for calling me today (1/4/2011) in response to our letter dated 1/4/2011 addressed to Pruhs Corporation. During our telephone conversation (1/4/2011, 2:00 pm CT, 907-770-6806, incoming) you indicated that it is your company's intention to apply for an NRC license right away and explained that the individual who received the September 8, 2010 email from the NRC was no longer working with your company. You also committed not to use portable gauge(s) and maintain the gauge(s) in storage. You also explained that right now is the winter season so there is no use for the gauge(s) anyways. You also stated that the gauge(s) is(are) expected to be used in the summer of 2011 but will not be used until an NRC license is obtained.

Pruhs Corporation needs to obtain a U.S. Nuclear Regulatory Commission license for the possession, storage and use of portable gauges in the State of Alaska. The application fee for a portable gauge license is $1,400 and the annual fee to maintain the license active is $3,400. If your company qualifies as a small business entity (see attached NRC Form 526) you can pay a reduced annual fee ($400 or $1900) depending on your company's average gross receipts for the last 3 years. You don't have to send Form 526 now nor pay the annual fee. You need to use Form 526 every year when you receive the annual fee invoice.

Information needed to apply for a license.

1. Fill out NRC Form 313 (see attached).

2. Complete Form 629 (payment by credit card) in the amount of $1,400 for the license application fee or mail the check.

3. Fill out Appendix B of NUREG-1556, Volume 1, revision 1 (see attached). This NUREG-1556, Volume 1, revision 1, provides guidance for you, the applicant, on the type of information you need to submit to the NRC in support of your license application. In Appendix B, do not check the box committing to "Operating and Emergency Procedures" in Appendix H. Appendix H is outdated and an errata sheet has been issued. Instead make the following commitment:

"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."

Attached is errata sheet to Appendix H. Background information on errata sheet to Appendix H: Revised 10 CFR 30.34 now requires that "each portable gauge licensee shall use a minimum of two independent physical controls that form tangible barriers 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). Errata to Appendix H provides "Operating, Emergency and Security" procedures that you can adopt to meet 10 CFR 30.34.

4. State who the proposed RSO is for the application. Submit training certificate for the proposed radiation safety officer. The NRC has found acceptable the following training: training as RSO for potable gauges OR training as gauge user. Training should cover HazMat and should have been taken within the last 3 years (HazMat recurrent training needs to be taken every 3 years).

5. Briefly state why you are requesting a license to use portable gauges, provide examples of proposed future projects in which you will use portable gauges.

6. Describe the radiation survey that you plan to possess or plan to have access to. Indicate type of radiation detected by the instrument and range of scale.

7. Provide copy of business registration certificate with the State of Alaska Department of State. State how many years your company has been in business.

8. Provide a copy of your registration with the State of Alaska for the possession of Radium-226.

9. Provide your company's website address, if available.

10. Provide the names of all the owners of the company and organization chart with individual's names and positions.

11. Describe the security of the proposed storage location for the portable gauges. Provide diagram with dimensions. Diagram should include storage location for the gauges. Indicate if location of use is a residence or a business location. Indicate how the storage location meets the two independent physical controls (see Item 2).

12. Indicate if your company has ever had an NRC or Agreement State license for portable gauges.

13. Provide copies of federal tax identification number and/or any professional licenses.

14. Indicate how many portable gauges you want authorized in the license. Provide manufacturer's name, model number and gauge serial number. Indicate any future projections (future needs).

15. Provide copy of the most recent leak test result for any portable gauges in your possession.

Submit the application package (items 1 through 15) via reply email as pdf files to me OR send hard copies via regular mail to:

US NRC Region IV
ATTN: Licensing Assistant
612 East Lamar Boulevard, Suite 400
Arlington, Texas 76011-4125

Call or email me if you have any questions. Please confirm receipt of this email.

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