



lounsbury & associates, inc.

5300 A Street Anchorage, Alaska 99518

T: 907-272-5451 F: 907-272-9065

3161 East Palmer-Wasilla Highway, Suite 2 Wasilla, Alaska 99645

T: 907-357-9129 F: 907-357-9140

TRANSMITTAL

Date: 26 January 2011	Job No:
ATTENTION: Roberto Torres	
RE: NRC request for additional information in support of new license application.	

TO: 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

COPY TO:

WE ARE SENDING YOU
THESE ITEMS

- | | | |
|--|---------------------------------------|--|
| <input checked="" type="checkbox"/> Attached | <input type="checkbox"/> via FAX | <input type="checkbox"/> Original Mailed |
| <input type="checkbox"/> Shop Drawings | <input type="checkbox"/> Prints | <input type="checkbox"/> Plans |
| <input type="checkbox"/> Copy of Letter | <input type="checkbox"/> Change Order | <input type="checkbox"/> Specifications |
| | | <input type="checkbox"/> Samples |
| | | <input type="checkbox"/> Other |

COPIES	DATE	NO.	DESCRIPTION
1	1/25/11		Additional Information Letter
1	1/25/11		Leak Test Results
1	1/26/11		Outlook Delivery Failure Message

THESE ARE TRANSMITTED (as checked below)

- | | | |
|--|---|--|
| <input checked="" type="checkbox"/> For Approval | <input type="checkbox"/> Approved as Submitted | <input type="checkbox"/> Resubmit |
| <input type="checkbox"/> For your use | <input type="checkbox"/> Approved as Noted | <input type="checkbox"/> Submit |
| <input type="checkbox"/> As Requested | <input type="checkbox"/> Returned for Corrections | <input type="checkbox"/> Return |
| <input type="checkbox"/> For Review and Comment | <input type="checkbox"/> FOR BIDS DUE | <input type="checkbox"/> RETURNED AFTER LOAN TO US |

REMARKS:

SIGNED:

Pat Butler

lounsbury & associates, inc.

January 25, 2011

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

Attention: Roberto J. Torres

Regarding: **Supplemental Information for US NRC License Application**

Dear Mr. Torres:

The leak test for the C-300 has been performed and the results are attached. The test kit for the C-200 has been sent to the North Slope and is waiting on the trained personnel to rotate back and take the test. Once the tests results have been received we will forward the results to you for your review.

The Model C-200 was acquired in approximately 2000. The C-300 was acquired in 2009.

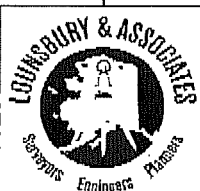
Lounsbury would like to have 3 portable gauges authorized on our license, 1 each Seaman Nuclear Corporation models C-200 and 2 each Seaman Nuclear Corporation models C-300.

" we will implement and maintain the "operating, Emergency and Security Procedures" described in the errata Sheet of Appendix H of NUREG-1556, Volume 1, Revision 1, and provide copies of these procedures to all gauge user and at each job site. "

Calculations showing that individual users will not receive a radiation dose in exceed of 10% of the allowable limit have been made and will be retained on file for review by the NRC.

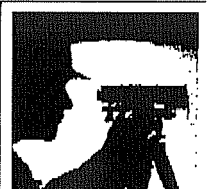
Calculations showing that the public will not receive a radiation dose in exceed of 10% of the allowable limit have been made and will be retained on file for review by the NRC.

Lounsbury and Associates became aware that they need to apply for a license with the NRC in September of 2010.



5300 A Street Anchorage, Alaska 99518 T: 907-272-5451 F: 907 272-9065
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WWW.LOUNSBURYINC.COM

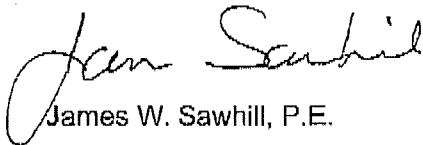


Supplemental Information for US NRC License Application
January 25, 2011
Page 2

Lounsbury and Associates did not submit a license application prior to the August 7, 2010 dead line because the dead line passed prior to us knowing about the requirement. Once we became aware we should have applied for a license more timely, but unfortunately we did not.

Sincerely,

Lounsbury & Associates, Inc.

A handwritten signature in cursive script, appearing to read "James W. Sawhill".

James W. Sawhill, P.E.

President

lounsbury & associates, inc.

Seaman Nuclear Corporation

7315 South First Street Oak Creek, WI 53154 USA

Tel 414-762-5100 Fax 414-762-5106

Leak Test Certificate

January 14, 2011

A leak test has been performed on meter, serial number **21328**, a model C-300, containing the radionuclide Ra 226.

Owned By: Lounsbury & Associates
5300 A St.
Anchorage, AK 99503

Date Sample Collected: 1/10/11
Collected By: Pat Butler
Date Sample Analyzed: 1/14/11
Analyzed By: T. Lindemann

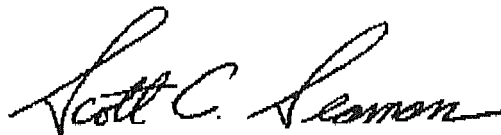
Most regulatory agencies consider a source to be leaking if a leak test reveals the presence of more than 0.005 microcurie of removable contamination.

Analysis found contamination of less than 0.005 microcurie.


Analysis authorized by Wisconsin license 079-1257-01.

Seaman Nuclear Corporation

LEAK TEST DUE: 1/10/12



Scott C. Seaman
Radiation Safety Officer

S/N: 21328
Leak Tested: 1/14/11
Due: 1/10/12
 Seaman Nuclear Corporation
Oak Creek, WI (414) 762-5100

Pat Butler

From: Microsoft Outlook
To: Torres, RobertoJ
Sent: Tuesday, January 25, 2011 8:09 PM
Subject: Delivery delayed:RE: NRC request for additional information in support of new license application

Delivery is delayed to these recipients or groups:

Torres, RobertoJ (RobertoJ.Torres@nrc.gov)

Subject: RE: NRC request for additional information in support of new license application

This message hasn't been delivered yet. Delivery will continue to be attempted.

The server will keep trying to deliver this message for the next 1 days, 19 hours and 56 minutes. You'll be notified if the message can't be delivered by that time.

Roberto, I get this error message each time I have tried to Email you. I replied to your email so the address should be correct.

Torres, RobertoJ

From: Torres, RobertoJ
Sent: Thursday, January 20, 2011 12:09 PM
To: 'p.butler@lounsburyinc.com'
Subject: NRC request for additional information in support of new license application
Attachments: App H NUREG 1556 Vol 1-errata.pdf; NUREG1556v1r1.pdf

Mr. Butler:

I have completed the technical review of Lounsbury and Associates' application for a new license. Please provide the following additional information in a signed and dated letter by Mr. Jim Sawhill to continue the review process. You can provide the response via reply email as a pdf file, by facsimile to 817-860-8263 or by regular mail. If you send the response electronically (email or fax) do not send a paper copy by regular mail. Thank you.

1. Provide copies of the most recent leak test results for Seaman C-300 serial no. 21328 and Seaman C-200 serial no. L 660. State the date both gauges were first acquired by Lounsbury and Associates (date approximation is acceptable). Indicate how many portable gauges in total Lounsbury and Associates wants authorized on the license to account for future projections (indicate manufacturer's name and model number).
2. Appendix H of NUREG-1556, Volume 1, revision 1, titled "Operating and Emergency Procedures" was revised and updated (see attached file App H NUREG 1556 Vol 1-errata.pdf). In the license application, Lounsbury and Associates committed to implement the outdated procedure instead of the revised procedure. To correct this deficiency please commit to the following language:

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

3. In the application Lounsbury and Associates committed to maintain, for inspection by the NRC, documentation demonstrating that unmonitored individuals are not likely to receive a radiation dose in excess of 10 percent of the allowable limits in 10 CFR Part 20. In support of this statement Lounsbury and Associates submitted a March 2009 memo from Seaman Nuclear Corporation. This memo from Seaman Nuclear is not sufficient to demonstrate that gauge users do not need to use dosimeters because they are not likely to receive a radiation dose in excess of Part 20 limits. To correct this deficiency, Lounsbury and Associates needs to perform their own dosimetry calculation following the guidance in Part 1 of Appendix I (Dosimetry Related Guidance) of NUREG-1556, Volume 1, revision 1, and keep the dosimetry calculation (basis to determine that users need not to wear dosimeters) on file for review during NRC inspections (see attached copy of NUREG-1556, Volume 1, revision 1). Commit to perform this calculation and keep the record on file for review during NRC inspections.
4. Lounsbury and Associates needs to perform their own public dose assessment following the guidance in Part 2 of Appendix I (Dosimetry Related Guidance) of NUREG-1556, Volume 1, revision 1, and keep the public dose assesement (calculation) on file for review during NRC inspections. Commit to perform this calculation and keep the record on file for review during NRC inspections.
5. On what date did Lounsbury and Associates become aware that they needed to apply for a license with the NRC because of the change in regulation from the State of Alaska to the NRC?

6. Provide a reasonable argument why Lounsbury and Associates did not submit a license application with the NRC before the August 7, 2010 deadline.

Feel free to contact me if you have any questions about this request for additional information. 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
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Arlington, Texas 76011-4125
Telephone 817-860-8189
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robertoj.torres@nrc.gov