



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION I
475 ALLENDALE ROAD
KING OF PRUSSIA, PENNSYLVANIA 19406-1415

December 8, 2011

Docket No. 03035769
Control No. 576068

License No. 45-25569-01

Robert C Stultz
Radiation Safety Officer
Well Data Services, Inc.
15352 Riverside Drive
Oakwood, VA 24631

SUBJECT: WELL DATA SERVICES, INC., REQUEST FOR ADDITIONAL INFORMATION CONCERNING APPLICATION FOR LICENSE RENEWAL, CONTROL NO. 576068

Dear Mr. Stultz:

This is in reference to your application dated September 21, 2011, requesting to renew Nuclear Regulatory Commission License No. 45-25569-01. In order to continue our review, we need the following additional information:

1. Item 2 of the application shows a different address than that on your current NRC license. Please explain the change of address.
2. Item 3 of the application states the office location where material will be stored. Please include the statement "and temporary jobsites within NRC jurisdiction" if you will be engaging in well logging with licensed material at temporary jobsites within NRC jurisdiction.
3. Item 5 of the application requires the applicant to identify each radionuclide that will be used in each source. Provide the manufacturer's name and model number for each sealed source. Please confirm the manufacturer's name, model number, activity per source, and the maximum activity that will be used for licensed operations within NRC jurisdiction.
4. Item 6 of the application states "We plan to perform in fresh water aquifers: Well logging using sealed sources." Use of radioactive materials in fresh water aquifers is a prohibited activity. The Operating and Emergency procedures submitted with the application did not include all items required to authorize this activity. Authorization to use sealed sources or neutron generators in fresh water aquifers requires that Operating and Emergency procedures include the following information:
 - a. Obtaining specific knowledge of the borehole conditions from the drilling team or company.
 - b. First running a caliper log to show the hole is open or to find problem areas
 - c. First running a tool without a radioactive source to show it can be freely removed
 - d. Placing a temporary casing in sections of the hole giving problems.

Please revise the Operating and Emergency procedures to include the required items above and resubmit them, or remove the request for authorization to perform well logging using sealed sources in fresh water aquifers. Additional information regarding this item can be found in NUREG-1556, Volume 14, and in 10 CFR 39.

5. Item 8 of the application requires the applicant to provide an outline of the training to be given to prospective logging supervisors and assistants. The training outline submitted with the application did not include all of the items required by 10 CFR 39.61. Please revise the training outline to address the items required by the regulation and resubmit. Additional information regarding this item can be found in NUREG-1556, Volume 14.
6. Item 9 of the application requires the applicant to provide a sketch of the facility and all work areas where materials will be used or stored. Since your storage location is in the State of Virginia, please do not submit the diagram. In response to the request for a sketch of the facility, simply state that there are no storage areas within NRC jurisdiction.
7. Item 10 of the application requires the applicant to submit a copy of the Agreement with the Well Owner or Operator, to include the elements required by 10 CFR 39.15. The application submitted did not include this document. Please submit the Agreement.
8. Item 13 of the application is signed by the Radiation Safety Officer. Please ensure this item is signed by an individual authorized to make binding commitments and to sign official documents on behalf of the legal entity or applicant. Authorized individuals may be the President, Vice President, Treasurer, etc. of a company.

Current NRC regulations and guidance are included on the NRC's website at www.nrc.gov; select **Nuclear Materials; Med, Ind, & Academic Uses**; then **Licensee Toolkits, see our toolkit index page**. You may also obtain these documents by contacting the Government Printing Office (GPO) toll-free at 1-866-512-1800. The GPO is open from 8:00 a.m. to 5:30 p.m. EST, Monday through Friday (except Federal holidays).

You may provide the above items separately, or submit a complete revised application. We will continue our review upon receipt of this information. Please reply to my attention at the Region I Office and refer to Mail Control No. 576068. Should you choose to do so, you may submit the reply by facsimile to 610-337-5269. If you have any technical questions regarding this deficiency letter, please call me at (610) 337-5136.

R. Stultz

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If we do not receive a reply from you within 30 calendar days from the date of this letter, we will assume that you do not wish to pursue your application.

Sincerely,

Original signed by Michael Reichard

Michael Reichard
Health Physicist
Materials Security and Industrial Branch
Division of Nuclear Materials Safety

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