



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION IV
1600 EAST LAMAR BOULEVARD
ARLINGTON, TEXAS 76011-4511

February 15, 2012

Cook-Sanders Associates, Inc.
ATTN: David Peterson
Director of Operations
P.O. Box 1048
Evanston, Wyoming 82931

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION

The U.S. Nuclear Regulatory Commission (NRC) has completed the technical review of Cook-Sanders Associates, Inc. application for a radioactive materials license and additional information is needed to complete the review process. Please provide the following information in a signed and dated letter within 30 days of receipt of this communication. Make reference to mail control number 576852 when providing your response.

1. NRC Form 313 needs to be signed by an individual who can make legally binding commitments on behalf Cook-Sanders Associates, Inc. Please submit NRC Form 313 signed and dated by a company principal and/or owner. This individual must indicate his or her company title in Item 13.
2. Item 3 of NRC Form 313 did not indicate whether your company is seeking authorization to perform work at temporary job sites anywhere in the United States where the NRC maintains jurisdiction. Indicate in your response if you are seeking this authorization.
3. State why your company is requesting a license to use portable gauges. Briefly describe proposed future projects in which your company will use portable gauges.
4. The training certificate provided for the proposed radiation safety officer has no date. Provide a dated training certificate and training course syllabus.
5. Describe the security of the proposed storage location for the portable gauges. Provide diagram with dimensions. Diagram should include storage location for the gauges and surrounding areas. Indicate if the storage location is in a residential, business, or industrial area.
6. Provide copy of your company's Federal tax identification certificate, copy of your company's registration certificate with the State of Wyoming Department of State, copy of proof of business insurance, and copies of individual's professional engineering and/or surveyor's licenses.
7. Provide the names of all the owners and/or principals of the company, and an organization chart with individual's names and positions.

8. Describe the radiation survey instrument that you plan to possess. Indicate type of radiation detected by the instrument and range of scale.
9. Indicate how many Troxler 3400 Series portable gauges you want authorized in the NRC license.
10. Provide the following commitment: "Before obtaining licensed materials, the proposed RSO will have successfully completed one of the training courses described in Criteria in the section entitled "Individual(s) Responsible for Radiation Safety Program and Their Training and Experience – Radiation Safety Officer" in NUREG-1556, Vol. 1, Rev. 1, dated November 2001."
11. Provide the following commitment: "Before using licensed materials, authorized users will have successfully completed one of the training course described in Criteria in the section entitled "Training for Individuals Working In or Frequenting Restricted Areas" in NUREG-1556, Vol. 1, Rev 1, dated November 2001."
12. Provide the following commitment: "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."
13. Provide the following commitment: "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."
14. Provide the following commitment: "Either we will maintain, for inspection by 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, or we will provide dosimetry processed and evaluated by an NVLAP-approved processor that is exchanged at a frequency recommended by the processor."
15. Note that 10 CFR 30.34, Terms and Conditions of Licenses, was revised to enhance the security requirements for portable gauges containing byproduct material. This revision became effective July 11, 2005. 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). Guidance on these security procedures is provided in revised Appendix H of NUREG-1556, Volume 1, rev. 1 (see attachment). Commit to the following language: "We will implement and maintain the "Operating, Emergency, and Security Procedures" described 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."

16. Commit to the following language: "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."

In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice," a copy of this letter will be available electronically for public inspection in the NRC Public Document Room or from the NRC's document system (ADAMS). ADAMS is accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html>.

Thank you for your cooperation.

Sincerely,

/RA/

Roberto J. Torres, Senior Health Physicist
Nuclear Materials Safety Branch B

Docket: 030-38515

Control: 576852

Enclosure: As stated