

Conversation Record



TO: Raymond Bailey

COMPANY: ABNA Engineering, Inc.

Jennifer Bishop
Materials Licensing Branch
U.S. Nuclear Regulatory Commission
Region III
2443 Warrenville Road, Suite 210
Lisle, Illinois 60532-4351
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PAGES: 3

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CONVERSATION RECORD

TIME DATE
7:35 am 11/8/2012

NAME OF PERSON(S) CONTACTED	TELEPHONE NO.	ORGANIZATION
Raymond Bailey	314-454-0222	Radiation Safety Officer

License No.: 24-32415-01

Control No.: 577717

SUMMARY

This refers to your application to renew your license dated June 13, 2012 and the phone conversation between William Jackson and Jennifer Bishop on November 8, 2012.

During our review of your application dated June 13, 2012, it appeared that your application had not been completely prepared in accordance with the guidance in NUREG 1556, Vol. 1, Rev. 1, "Consolidated Guidance about Materials Licenses: Program-Specific Guidance about Portable Gauge Licenses, dated November 2001." This omission has resulted in an incomplete application that contains numerous restrictive elements which we believe you would find difficulty complying with, if we were to include them in your license.

Please resubmit your application, focusing on the responses and commitments in Appendix B to the aforementioned NUREG.

1. In Item 10 "Radiation Safety Program," you failed to provide information on how you will meet the criteria under survey instruments.

RESPONSE: Please respond by requesting either "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," or a description of an alternative procedure for determining source integrity after an incident involving the gauge.

2. In Item 10 "Radiation Safety Program," you failed to provide information on how you will meet the criteria under occupational dosimetry.

RESPONSE: Please respond by stating "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 or we will provide dosimetry processed and evaluated by an NVLAP-approved processor that is exchanged at a frequency recommended by the processor."

3. In Item 10 "Radiation Safety Program," you failed to provide information on how you will meet the criteria under material receipt and accountability.

RESPONSE: Please respond with "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."

4. In Item 10 "Radiation Safety Program," you failed to provide information on how you will meet the criteria under emergency and operating procedures.

RESPONSE: Please respond by requesting either "We will implement and maintain the operating and emergency procedures in Appendix H of NUREG-1556, Vol. 1, Rev. 1, 'Consolidated Guidance about Materials Licenses: Program-Specific Guidance about Portable Gauge Licenses,' dated November 2001, and provide copies of these procedures to all gauge users and at each job site" or "Operating and emergency 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, 'Consolidated Guidance about Materials Licenses: Program-Specific Guidance about Portable Gauge Licenses,' dated November 2001."

5. In Item 10 "Radiation Safety Program," you failed to provide information on how you will meet the criteria under leak testing.

RESPONSE: Please respond by requesting "Leak tests will be performed at intervals approved by NRC or an Agreement State and will be specified in the SSDR 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 or meets the Criteria in the section entitled 'Radiation Safety Program – Leak Tests' in NUREG-1556, Vol. 1, Rev. 1, dated November 2001."

6. In Item 10 "Radiation Safety Program," you failed to provide information on how you will meet the criteria under maintenance.

RESPONSE: Please respond by requesting either "We will implement and maintain procedures for routine maintenance of our gauges according to each manufacturer's recommendations and instructions" and "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," or provide the information in Appendix G of NUREG 1556, Vol. 1, Rev. 1 supporting the request to perform routine and non-routine maintenance in house.

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 Agencywide Documents Access and Management System (ADAMS), accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html>.

Action Required:

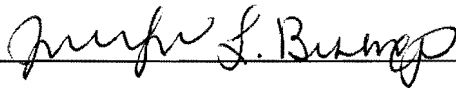
Submit the requested information within 7 calendar days (by November 15, 2012) by referencing control number 577717 to facilitate proper handling in our office. Please contact me if you need to make alternative response arrangements.

PLEASE DIRECT ANY QUESTIONS YOU MAY HAVE TO ME AT (630) 829-9607.

NAME OF PERSON DOCUMENTING
CONVERSATION

SIGNATURE
DATE

Jennifer Bishop



11/8/2012
