

**From:** [Lawyer, Dennis](#)  
**To:** [meghan.yingling@univwell.com](mailto:meghan.yingling@univwell.com)  
**Subject:** Universal Well Services, Inc., Request for Additional Information Concerning Application for a License Amendment, Control 582661  
**Date:** Tuesday, December 24, 2013 8:21:00 AM

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Dear Meghan Yingling,

This is in reference to your application dated November 27, 2013, requesting for amendment to Nuclear Regulatory Commission License No. 37-35092-01, Docket No. 03038671. In order to continue our review, we need the following additional information:

1. You have submitted two additional line items for cesium 137 sources in Attachment B of your application. In a telephone call on December 23, 2013, you stated that these sources were to possess Berthold Technologies U.S.A. Inc. Model LB7400 series fixed gauges. As this series is combined in the Sealed Source and Device Registry, it may appear as one line item. Please confirm that you are requesting for a maximum of 60 mCi, cesium 137 for the purpose of possessing Berthold Technologies U.S.A. Inc. Model LB7400 series fixed gauges for controlling industrial processes using QSA Global, Incl Model CDC.P4 or BEBIG Model Cs7.PO2 sources.
2. You have requested to install, remove, and remount your fixed gauges and have submitted information to support this activity. NUREG-1556, Volume 4 (<http://www.nrc.gov/reading-rm/doc-collections/nuregs/staff/sr1556/v4/>), "Consolidated Guidance About Materials Licenses Program-Specific Guidance About Fixed Gauge Licenses," Appendix N, Information Needed to Support Applicant's Request to Perform Non-Routine Operations, provides the details of the information needed to support this request. In Attachment C of your application, you submitted much of this information but the following items were not submitted or needs more detail:
  - a. Identify who will perform non-routine operations and their training and experience. Acceptable training would include manufacturer's or distributor's courses for non-routine operations or equivalent;
  - b. Submit how doses to personnel and members of the public are within regulatory limits and ALARA or submit the ALARA policy as described in the Universal Well Services Radiation Protection Plan (UWS RPP);
  - c. Provide how the source is secured against unauthorized removal or access or under constant surveillance or submit the UWS RPP section on Use of Nuclear Density Gauges.
  - d. Submit how appropriate labels and signs are used or submit the UWS RPP section Use of Nuclear Density Gauges – Posting Requirements;
  - e. Confirm that individuals performing non-routine operations on gauges will wear both whole body and extremity monitoring devices or perform a prospective evaluation demonstrating that unmonitored individuals performing non-routine operations are not likely to receive, in one year, a

radiation dose in excess of 10% of the allowable limits; and

- f. Commit to maintaining, for 3 years from the date of the survey, records of the survey (e.g., who performed the survey, date of the survey, instrument used, measured radiation levels correlated to location of those measurements), as required by 10 CFR 20.2103.

We will continue our review upon receipt of this information. Please reply to my attention at the Region 1 Office and refer to Mail Control No. 582661. If you have technical questions regarding this letter, please call me at (610) 337-5366.

The NRC's Safety Culture Policy Statement became effective in June 2011. While a policy statement and not a regulation, it sets forth the agency's *expectations* for individuals and organizations to establish and maintain a positive safety culture. You can access the policy statement and supporting material that may benefit your organization on NRC's safety culture Web site at <http://www.nrc.gov/about-nrc/regulatory/enforcement/safety-culture.html>. We strongly encourage you to review this material and adapt it to your particular needs in order to develop and maintain a positive safety culture as you engage in NRC-regulated activities.

*Please note that you may not reply to this letter by return e-mail. Your reply must be in writing by letter or facsimile (610-337-5269). If we do not receive a reply from you within 30 calendar days from the date of this e-mail, we will assume that you do not wish to pursue your application.*

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