

Junod, Rebecca

From: Lawyer, Dennis
Sent: Tuesday, January 14, 2014 8:42 AM
To: carlosrodriguez@geo-engineering.com
Subject: GEO Engineering, Request for Additional Information Concerning Application for a License Renewal, Control 582789

Dear Dr. Carlos E. Rodriguez,

This is in reference to your letter dated December 13, 2013, requesting for renewal to Nuclear Regulatory Commission License No. 52-25266-01, Docket 03033265. In order to continue our review, we need the following additional information:

1. You provided a request for radioactive materials stating the isotope and the gauge serial numbers. [NUREG-1556, Volume 1, Revision 1](#), "Consolidated Guidance About Materials Licenses Program-Specific Guidance About Portable Gauge Licenses," section 8.5.1 states to identify the manufacturer or distributor and model number of each type of sealed source and device requested. Please identify the manufacturer or distributor and model number of each type of sealed source and device requested. Also, please state the maximum source activity for each isotope you would like to be licensed. It is recommended that you use Appendix B Items 5 and 6 from NUREG - 1556, Volume 1, Rev 1 in your response.
2. You stated in item 8 of your application, that soil technicians had completed the courses on radiation safety and use of nuclear gauges. This statement is not specific enough to the training performed or what future personnel frequenting restricted areas would need to perform. NUREG-1556, Volume 1, Revision 1, Section 8.8 states to provide portable gauge manufacturer's course for users, or equivalent course that meets Appendix D criteria. The NUREG states for the licensee to state, "Before using licensed materials, authorized users will have successfully completed one of the training courses described in criteria in the section entitled 'Training for Individuals Working In or Frequenting Restricted Areas' in NUREG-1556, Vol. 1, Rev. 1, 'Consolidated Guidance about Materials Licenses: Program-Specific Guidance about Portable Gauge Licenses,' dated November 2001" or give a description of the training and experience for proposed gauge users.
3. You stated in section 10 that you will use "approved" dosimeters. Section 8.10.5 of NUREG-1556, Volume 1, Revision 1, states to provide dosimetry processed and evaluated by an NVLAP-approved processor that is exchanged at a frequency recommended by the processor. Your statement is unclear if your approved dosimeters meet this criteria. Please state, "We will provide dosimetry processed and evaluated by an NVLAP-approved processor that is exchanged at a frequency recommended by the processor."
4. You stated in section 10 that you possess a calibrated survey meter. As stated in Section 8.10.3, that the instrument is capable of detecting gamma radiation.

We will continue our review upon receipt of this information. Please reply to my attention at the Region 1 Office (Address below) and refer to Mail Control No. 582789. 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). We request a reply from you within 30 calendar days from the date of this e-mail.

Region 1 Office Mailing Address: Licensing Assistance Team, US Nuclear Regulatory Commission Region I, 2100 Renaissance Boulevard, Suite 100, King of Prussia, PA 19406-2713.

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