

**From:** Cassata, James  
**To:** ["Don@primendt.com"](mailto:Don@primendt.com)  
**Subject:** Request for Additional Information (RAI) Regarding License Renewal Application Control No. 585754  
**Date:** Monday, May 18, 2015 10:59:00 PM  
**Importance:** High

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License No.: 37-23370-01

Docket No: 030-20982

Control No: 585754

Licensee Name: Prime NDT Services

President/ RSO: Don B. Shumway, Jr. (Office Phone 610-262-1100 Ext 13; Business Cellular 610-417-4950)

Mr. [Shumay](#),

This is in reference to your letter and renewal application dated December 30, 2014, for Nuclear Regulatory Commission (NRC) License No. 37-23370-01. In order to continue our review, we need the following:

1. A review of your operating and emergency procedures identified that they fail to provide immediate response actions to a ratemeter alarm, per 10 CFR 34.13(d), 10 CFR 34.45. Please provide a revision to your operating and emergency procedures to include what actions should be taken in the event of ratemeter alarm.
2. In your procedures for retrieval and recovery of a source, it is stated that, "All retrievals will be done or supervised by Prime NDT's RSO who has successfully completed the AEA Technology Retrieval Course." However, it is not clear that the RSO will be present at temporary jobsites to perform or supervise the retrieval and recovery of a source. Please provide a revision to your operating and emergency procedures stating that the RSO will be present at the temporary jobsite during retrieval and recovery of a source; or in the case where the RSO cannot be present at the temporary jobsite then another radiographer who has successfully completed the AEA Technology Retrieval Course will be onsite to perform or supervise the retrieval and recovery of a source; or if a trained radiographer in source retrieval and recovery is not available at the temporary jobsite then Prime NDT Inc., will not perform a retrieval and recovery of a source in this situation and will use the services of a person specifically licensed by the NRC or an Agreement State to perform the retrievals of your sources. Further, in your procedures it is stated that, "Not all mobile units will be equipped with every item (in the list above this statement)." Please revise your operating and emergency procedures to state that at a minimum the source recovery safety equipment at a temporary jobsite during the retrieval and recovery of a source shall at least include survey meters, dosimeters, and safety tongs (for picking up source). The radiography present during the time of a disconnect may use whatever shielding is available to minimize the radiation area.

*Your reply must be in writing by letter and signed by a management representative (in this case it may be you since you are both RSO and President). To expedite processing of your renewal application it is recommended that you please return your signed reply letter as a PDF attachment in*

***an e-mail to me*** or alternative facsimile it to 610-337-5269, with attention to: James R. Cassata.  
***(Again, please note that you may not reply to this request for information by return e-mail alone, you must have a signed letter and either attach as a PDF, fax, or use the U.S. mail system to send your reply letter to the Region I Office.)***

***Please always include the Mail Control No. 585754 with all correspondence. We will continue our review upon receipt of this information. 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.***

If you have technical questions regarding this e-mail, please contact me at (610) 337-5303.

Thank you for your cooperation.

James R. Cassata, Ph.D., CHP  
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Enclosures:

1. 10 CFR Parts 19, 20, 21, 30, and 34

<http://www.nrc.gov/reading-rm/doc-collections/cfr/>

2. NUREG-1556, Volume 2

<http://www.nrc.gov/reading-rm/doc-collections/nuregs/staff/sr1556/v2/>

3. NRC Form 313

<http://www.nrc.gov/reading-rm/doc-collections/forms/nrc313.pdf>