

From: Miller, John
To: jcornette@uswellservices.com
Subject: Amendment request - Mail Control # 586985
Date: Monday, June 22, 2015 2:33:00 PM

U.S. Well Services, LLC
License No. 47-35025-01
Docket No. 030-38597
Control No. 586985

Mr. Cornette

In order to continue the review of your application to amend your NRC license, we need additional information. If you have any questions, please contact me (610-337-5089).

1. Please identify who will perform non-routine operations, specifically relocating the gauge from one pipe to another. and their training and experience. Provide a description of the individuals training and experience. Acceptable training would include manufacturer's course for non-routine operations or equivalent.
2. Submit procedures for non-routine operations. These procedures should ensure the following:
 - Doses to personnel and members of the public are within regulatory limits and are ALARA.
 - The source is secured against unauthorized removal or access or under constant surveillance;
 - Appropriate labels and signs are used;
 - The manufacturer's instructions and recommendations are followed;
 - Before being returned to routine use, the gauge is tested to verify that it functions as designed and source integrity is not compromised.
3. 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.
4. Please describe the survey meter that you will use to assess the radiation fields during the gauge relocations. Please confirm that the survey instrument that meets the criteria in "Radiation Safety Program - Instruments in NUREG-1556, Vol. 4, 'Consolidated Guidance about Materials Licenses: Program-Specific Guidance about Fixed Gauges Licenses,' dated October 1998."
5. Describe steps to be taken to ensure that radiation levels in areas where non-routine operations will take place do not exceed 10 CFR 20.1301 limits. For example, applicants can do the following:

- commit to performing surveys with a survey instrument (as described above.
- Specify where and when surveys will be conducted during non-routine operations.
- Please 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.

Please respond in writing with a **signed letter**. You may submit the signed response document by hard copy, or as a pdf copy attached to an email, or by facsimile to 610-337-5269. Please be sure to include the Control No. 586985 on your response. We would appreciate a response within 20 days in order to expedite review of the license amendment application.

In preparing your response, please consult NUREG-1556, Vol. 4 for guidance.

<http://www.nrc.gov/reading-rm/doc-collections/nuregs/staff/sr1556/v4/sr1556v4.pdf>

Thank you for your cooperation.

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