

Walt, GERALYN

From: Miller, John
Sent: Monday, October 05, 2015 11:04 AM
To: sohara@premierenergyserviceswv.com
Subject: New license application

Premier Energy Services
Docket No. 030-38861
Control No. 588475

Mr. O'Hara

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

1. In your application you specify that licensed material will be stored at your facility at 1 Dane Street, Clarksburg, WV 26307 and you have submitted a diagram of the facility. Do plan to perform radiography in the storage vault? Please indicate whether radiography will be performed at the place of business outside of a permanent facility as if the work was "in the field." For radiography performed at the place of business as if the work was "in the field," provide a diagram of the location where radiography may be performed and its surroundings, including a description of adjacent property.
2. Identify the manufacturer (or distributor) and model number of each sealed source, source assembly, exposure device and source changer to be possessed. Identify any depleted uranium that is used as shielding material.

Please confirm that each sealed source, device and source/device combination possessed is registered as an approved sealed source or device by the NRC or an Agreement State and will be possessed and used in accordance with the conditions specified in the registration certificate.

3. You indicated that you have completed the radiation safety officer training provided by Nevada Technical Associates Inc. Please submit a copy of the certificates for you and John Lafferre.

The information that you have submitted as qualifications for John Lafferre to serve as a site RSO does not document any experience as a radiographer. Mr. Lafferre is not required to have the equivalent experience as yourself, however he should be a qualified, experienced radiographer in order to perform as a site RSO. Please submit additional qualifications or retract your request.

4. Please submit an outline of the training to be given to prospective radiographers and radiographer's assistants. Describe the instruction provided to experienced radiographers who have worked for another licensee.
5. Submit a copy of a typical examination and the correct answers to the examination questions. Please indicate the passing grade.
6. Describe the annual refresher training program including topics to be covered and how the training will be conducted.

7. Since you are applying for a new license, please confirm that you have reviewed the requirements in 10 CFR Part 37 and you understand the requirements. Your confirmation of understanding is all that needs to be submitted.
8. On page 2, section 10.a.iii. of your application, you indicate that if the RSO or the site RSO cannot rule out radiation exposure as the cause for a self-reading pocket dosimeter reading off-scale, then the personnel dosimeter will be processed within 24 hours. Please confirm that the radiographer involved will not be permitted to perform licensed activities until the personnel dosimetry results are received.
9. On page 3, section a. iv. 4. of your application, you state “do not attempt source retrieval until the situation has been discussed with the RSO or other knowledgeable person.” However, on page 3, section b. of the application you indicate your company will not perform source retrievals. These statements are in conflict with one another. Please confirm that you will not perform source retrievals.
10. On page 11 of your application you stated that “annual inspection and maintenance must be performed by individuals specifically trained, qualified and authorized for this work. Please specify who in your organization will perform this work and describe the training and authorization that they have received.
11. Please submit operating and emergency procedures which provide instruction for performing source exchanges. The procedure should address the receipt of an incoming source changer including the package monitoring required by 10 CFR 20.1906 and include the complete exchange of a new source from the source changer into a exposure device and the removal of a decayed source from the exposure device and transfer into the source changer.
12. Please submit operating procedures that include instructions for proper use of personnel monitoring equipment. Refer to NUREG 1556 Vol. 2 for guidance. In addition, please submit operating and emergency procedures for notifying management of equipment malfunction or defect as required by 10 CFR Part 21.
13. On page 8 of your application you indicate that leak tests will be performed by a licensee authorized to perform such a service. Please confirm that the leak test will include the test for depleted uranium required by 10 CFR 34.27(e).
14. On page 17, section p. xviii. states that shipping papers shall be accessible in the vehicle at all times. The DOT regulations requires that the shipping papers be carried in the cab of the car on the front seat or in a pouch on the driver’s door. Please confirm that you will carry the shipping papers in the cab of the vehicle in accordance with DOT requirements. In addition, please confirm that the exposure device will be surveyed before it is transported to verify the transport index and radiations levels on contact are consistent with the package labeling.

Please refer to NUREG 1556, Volume 2 for assistance.

Please respond in writing with a **signed and dated 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. 588475 on your response. We would appreciate a response within 20 days in order to expedite review of the license application.

Thank you for your cooperation.

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