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To: gwinkler@atslab.com
Cc: [Cassata, James](#); [Welling, Blake](#)
Subject: Request for Additional Information for NRC License Application, Applied Technical Services, Inc., 10-35278-01, 03038879, 589142
Date: Monday, November 02, 2015 9:19:00 AM

Docket No. 03038879
License No. 10-35278-01
Control No. 589142

Jim J. Hills
President
Applied Technical Services, Inc.
1049 Triad Court
Marietta, GA 30062

SUBJECT: APPLIED TECHNICAL SERVICES, INC, REQUEST FOR ADDITIONAL INFORMATION CONCERNING APPLICATION FOR NEW LICENSE, CONTROL NO. 589142

Dear Mr. Hills:

This is in reference to your application dated October 15, 2015, applying for a Nuclear Regulatory Commission license. In order to continue our review, we need the following additional information:

- 1) In addition to radiography sources, cameras, and source exchangers; your application includes calibration sources. Do you intend to perform instrument calibration operations in NRC jurisdiction? If so, please submit your calibration procedures. If not, please indicate whether these sources will be used in NRC jurisdiction for other purposes or whether they will only be used outside of NRC jurisdiction.
- 2) Your application defines Radiation Safety Officer differently than the NRC. We believe that you use the term "Corporate Radiation Safety Officer" to mean what the NRC defines as the "Radiation Safety Officer." We believe that you use the term Radiation Safety Officer to mean local designees of the Corporate Radiation Safety Officer. Please clarify the Roles and Responsibilities of these different individuals. Please clarify how the Radiation Safety Officer oversees the local designees.
- 3) Please provide an organization chart and/or written description that explains the level of oversight from local and/or corporate management over the Corporate Radiation Safety Officer, local Radiation Safety Officers, and radiography staff.
- 4) Electronic Dosimeters cannot be used in lieu of both pocket dosimeters and alarming ratemeters without an approved exemption request (10 CFR 34.111). Please revise your procedures to be in compliance with 10 CFR 34.47 and submit them with your response. Alternatively, if you are planning on requesting an exemption then please submit your supporting information for review. Note: In order to complete the application for your new license in the shortest time, you can request the exemption as a separate licensing action, if you wish. You could send in an amendment request for the exemption using NRC form

313. The exemption request will undergo a review by the Commission and a decision will be made to accept or reject the exemption. If you choose to request an exemption as a separate licensing action then you must follow the current regulations in 10 CFR 34.47 in the interim and until the exemption request has been approved. In this case please revise your procedures to be in compliance with 10 CFR 34.47 and submit them with your response.

- 5) Your procedures state that the boundary of a restricted area of a temporary job site will be surveyed during the first expose for each set up. Please clarify for the NRC and your employees what they should do if the exposure duration is too short to survey the full boundary during the first exposure.
- 6) Your procedures state that the radiographic personnel must maintain continuous direct surveillance of the radiographic area during the exposure. Please clarify for the NRC and your employees that they must maintain continuous direct surveillance during the exposure and until completion of the required survey of the camera and guide tube each time the source is retracted after an exposure.
- 7) Your procedures state that employees must post "Caution Radiation Area" signs at areas where radiation levels have been calculated to reach 2 mrem in any one hour. Please clarify for the NRC and your employees how these boundaries should be posted to ensure that all members of the public will readily see these postings before reaching the area, regardless of where they approach the area.
- 8) Your inspection and maintenance procedures do not include the use of a "go/no go" tool. Please clarify for the NRC and your employees whether the use of such a tool is required.
- 9) Your procedures require a survey of the guide tube after each exposure. Please clarify for the NRC and your employees that the entire guide tube must be surveyed.

Current NRC regulations and guidance are included on the NRC's website at www.nrc.gov; select **Nuclear Materials; Med, Ind, & Academic Uses**; then **Licensee Toolkits, see our toolkit index page**. You may also obtain these documents by contacting the Government Printing Office (GPO) toll-free at 1-866-512-1800. The GPO is open from 8:00 a.m. to 5:30 p.m. EST, Monday through Friday (except Federal holidays).

We will continue our review upon receipt of this information. Please reply to my attention at the Region I Office and refer to Mail Control No. 589142. If you have any technical questions regarding this deficiency letter, please call me at (610) 337-6945 or Dr. Jim Cassata at (610) 337-5303.

The reply to this request for additional information must be in the form of a signed and dated **reply letter** by a management representative/ certifying officer (an individual who is responsible for the processes for conduct and control of the licensee's radiation safety program and who has authority to provide necessary resources to achieve regulatory compliance). Please always include the Mail Control No. 589142 with all correspondence.

For expedience, please make an electronic PDF copy of the signed and dated letter and send it to us at Michael.reichard@nrc.gov and james.cassata@nrc.gov; or alternatively fax it to my attention at 610-337-5269. Once I receive the signed and dated letter you will receive a confirmation of receipt from me.

If we do not receive a reply from you within 30 calendar days from the date of this letter, we will assume that you do not wish to pursue your application.

Michael Reichard
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