

**From:** [Miller, John](#)  
**To:** [sohara@premierenergyserviceswv.com](mailto:sohara@premierenergyserviceswv.com)  
**Subject:** FW: RAI - Mail Control No. 588475  
**Date:** Tuesday, November 10, 2015 11:39:00 AM

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**From:** Miller, John  
**Sent:** Tuesday, November 10, 2015 11:33 AM  
**To:** 'sohara@premierenergyserviceswv.com' <sohara@premierenergyserviceswv.com>  
**Subject:** RAI - Mail Control No. 588475

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. I am unable to locate the QSA Global Ir-192 source Model A424-23 in our sealed source and device (SS&D) registry with a pairing for the QSA Global Model 880 Delta exposure device and the Model 650L source changer. Please retract your request for the Model A424-23 source or provide clarification on where it can be located in the SS&D registry. Per our phone conversation today, please confirm that you would like to be authorized for two exposure devices.
2. The sample exam that you have submitted should be better focused on radiation safety issues. There are too many questions concerning radiation theory or the practice of radiography as opposed to radiation safety and regulatory requirements. Your exam should address the following:
  - Surveys(e.g. after every exposure, restricted area boundary, prior to storage)
  - Personnel dosimetry – TLDs, self-reading, alarming
  - 2 man rule
  - Controlling access, posting
  - Emergency procedures
  - Daily inspection of equipment
  - DOT requirements
  - General security (not part 37)
  - Utilization logs

Questions 3,7,8,9,10,14,15, 23-25, 27-30,35-38,44-50 should be replaced with more practical questions that address radiation safety and the regulatory requirements. Question 12. is wrong.

Please modify and resubmit your radiation safety exam.

3. Please confirm that your leak tests will include the test for depleted uranium required by 10 CFR 34.27(e).

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 10 days in order to expedite review of the license application.

Thank you for your cooperation.

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Division of Nuclear Materials Safety

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