

Lawyer, Dennis

From: Lawyer, Dennis
Sent: Wednesday, December 30, 2015 7:23 AM
To: 'jeffd@ordersconstruction.com'
Subject: Orders Construction Company, Inc., Request for Additional Information Concerning Application for a License Renewal, Control 589657

Dear Mr. Jeffrey E. Dixon,

This is in reference to your application dated December 13, 2015, requesting for renewal to Nuclear Regulatory Commission License No. 47-19344-01, Docket No. 03017470. In order to continue our review, we need the following additional information:

1. Your application had many of the elements as stated in NUREG-1556, Volume 1, "Consolidated Guidance About Materials Licenses: Program-Specific Guidance About Portable Gauge Licenses," (<http://www.nrc.gov/reading-rm/doc-collections/nuregs/staff/sr1556/v1/r1/>) but may not be as clear as needed for the license. You stated that you would obtain a radiation survey meter as needed, but the guidance also says that the meter meets a certain criteria. Please state, "We will either possess and use, or have access to and use, a radiation survey meter that meets the Criteria in the section entitled "Radiation Safety Program – Instruments" in NUREG-1556, Vol. 1, Rev. 1, dated November 2001.
2. Your application did not discuss performing periodic physical inventories. As stated in NUREG, Vol. 1, Rev 1, please state, "Physical inventories will be conducted at intervals not to exceed 6 months, to account for all sealed sources and devices received and possessed under the license.
3. Your application states that you will use monitoring as required. This is not clear and does not state that the monitoring would require NAVLAP accreditation. As stated in NUREG-1556, Vol.1, Rev. 1, please state, "Either we will maintain, for inspection by NRC, documentation demonstrating that unmonitored individuals are not likely to receive a radiation dose in excess of 10 percent of the allowable limits in 10 CFR Part 20, or we will provide dosimetry processed and evaluated by an NVLAP-approved processor that is exchanged at a frequency recommended by the processor."
4. Your application did not specifically state that the leak test kits would be from an organization authorized by the NRC or Agreement State to provide leak test kits to others. As stated in NUREG-1556, Vol. 1, Rev. 1, please state, "Leak tests will be performed by using a leak test kit supplied by an organization authorized by NRC or an Agreement State to provide leak test kits to other licensees."
5. Additional security requirements have been added since NUREG-1556, Vol. 1, Rev 1. was published. Please state, "We will develop, implement and maintain security procedures using information in the NUREG-1556, Volume 1, Rev. 1, Errata: Appendix H, "Operating, Emergency, and Security Procedures (<http://pbadupws.nrc.gov/docs/ML0521/ML052130055.pdf>)"

We will continue our review upon receipt of this information. Please reply to my attention at the Region 1 Office (Address below) and refer to Mail Control No. 589657. If you have technical questions regarding this letter, please call me at (610) 337-5366.

Please note that you may not reply to this letter by return e-mail. Your reply must be in writing by letter, facsimile (610-337-5269), or signed letter attached to an email. Please respond within 30 calendar days from the date of this e-mail.

Region 1 Office Mailing Address: Licensing Assistance Team, US Nuclear Regulatory Commission Region I, 2100 Renaissance Boulevard, Suite 100, King of Prussia, PA 19406-2713.

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