



WOLF RUN MINING COMPANY

2, 2016

A subsidiary of:



Director, Office of Nuclear Materials Safety
And Safeguards
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555-0001

Re: Termination of NRC License for (1) Berthold LB-7440 formerly located at the Baybeck Preparation Plant and Notice of disposal.

Dear Sir,

Attached you will find the details regarding the testing and attempted repair of the Berthold LB-7440 nuclear density gauge that was in use at the Wolf Run Mining Company – Baybeck Coal Preparation Plant. This was the only gauge at this facility and it was not replaced as the facility ceased processing coal in late 2007.

The gauge failed an audit on 10/31/2006 that was performed by John Hagley, Sales and Application Engineer for SABIA, INC.. Repairs were attempted on site but was unsuccessful and SABIA INC disposed of the gauge on 1/24/2007.

Apparently the paperwork was not filed or was somehow lost in the processing of the disposal. Email has attachment showing the removal of the complete gauge from the Baybeck Preparation Plant. I was not at this facility during that time period but it was handled by SABIA Inc. and the contact information for SABIA INC. is as follows:

John Hagley
Sales and Application Engineer - SABIA Inc.
Office: 304 743 5942 Cell - 304 634 6175 Email: jhagley@sabiainc.com

Please feel free to give me a call if you have any questions or require any additional information. Thanks!

Sincerely,
ICG Beckley, LLC

Terry Allison
Radiation Safety Officer
Office: 304 929 4280
Email: TAllison@archcoal.com

Terry Allison 5-19-2016

2221 Old Eccles Road - P.O. Box 49 - Eccles, West Virginia 25836
Phone: (304) 929 4260 * Fax: (304) 929 4297

GLTS



2300 N. Yellowstone Hwy
Idaho Falls, ID 83401
Bus: 208-528-8878
Fax: 208-528-8880

Industrial Radiology Specialists
NRC License # 11-27727-01

www.sabiainc.com

January 2, 2007

ICG Baybeck
353 Baylor Drive
Eccles, WV 25836

Attn: Basil McKinney

Subject: Repair of Berthold Density Gauge

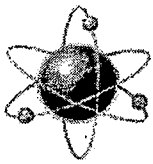
On December 20, 2006 an attempt was made to repair the shutter mechanism on the Berthold Density gauge serial number LB7440-63-1. The handle could not be repaired. The old handle was broken off. The screws in the front of the gauge were also too corroded to open. The shutter was forced into the closed position. It was then wedged into place with screws so that it cannot be opened. A radiation survey was performed to verify that the shutter was actually closed. The readings are attached. It is recommended but to remove the gauge.

Please file this letter in case anyone has any questions regarding the state of the device.

If you have any questions please contact me at 304-733-6131 or email me at the address below.

Sincerely,

John W. Hagley
Sales and Service Engineer
jhagley@sabiainc.com



SABIA INC

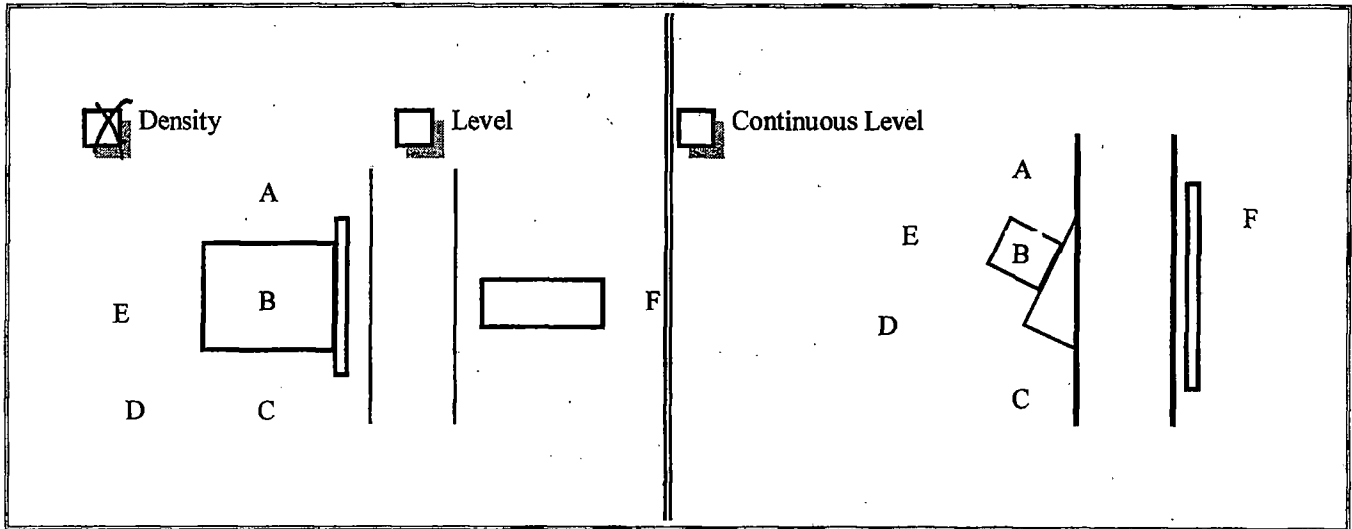
2300 N. Yellowstone Hwy
Idaho Falls, ID 83401
Bus: 208-528-8878
Fax: 208-528-8880

Industrial Radiology Specialists
NRC License # 11-27727-01

www.sabiainc.com

Fixed Gauge Radiation Survey Form

Customer Name: ICG Baybeck
Address: 353 Baylor Drive, Eccles WU 25836
Site Contact: Basil McKinney
Telephone Number: 304-253-5454
Product Brand: Berthold
Model: LB-2440
S/N: 63-1
Isotope: Cs-137 50uCi



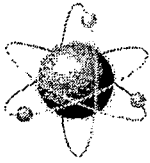
Shutter Process
 ON ON
 OFF OFF

mRem/hr	A	B	C	D	E	Max F
Contact	0.2	0.3	0.1	0.1	0.1	<0.1
12 Inches	0.1	0.1	<0.1	<0.1	<0.1	

Performed by: John Hagley

Date: 12-20-06

Point F was taken with the gauge removed and shutter closed.



SABIA[®] INC

2300 N. Yellowstone Hwy
Idaho Falls, ID 83401
Bus: 208-528-8878
Fax: 208-528-8880

Industrial Radiology Specialists
NRC License # 11-27727-01

www.sabiainc.com

PORTABLE AND FIXED GAUGE AUDIT CHECKLIST

Licensee's Name: ICG Baybuck License No.: General

Auditor: J. Hagley License Expiration Date: _____

Signature of Auditor: [Signature] Date of Audit: 10-31-06

RSO at time of Audit: _____

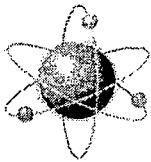
1. AUDIT HISTORY

- A. Last audit of this location conducted on (date): None
- B. Were previous audits conducted yearly? [10 CFR 20.1101] Yes No
- C. Were records of previous audits maintained? [10 CFR 20.2102] Yes No
- D. Were any deficiencies identified during the last two audits or two years, whichever is longer? Yes No
- E. Were corrective actions taken? (Look for repeated deficiencies). Yes No

Comments: No audits were conducted

2. ORGANIZATION AND SCOPE OF PROGRAM

- A. If the mailing address or places of use changed, was the license amended?
 Yes No N/A



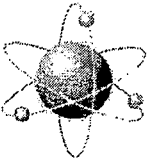
SABIA[®] INC

2300 N. Yellowstone Hwy
Idaho Falls, ID 83401
Bus: 208-528-8878
Fax: 208-528-8880

Industrial Radiology Specialists
NRC License # 11-27727-01

www.sabiainc.com

- B. If ownership changed or bankruptcy filed, was NRC prior consent obtained or was NRC notified? Yes No N/A
- C. 1. If the RSO was changed, was the license amended? Yes No N/A
2. Does the new RSO meet NRC training requirements? Yes No N/A
3. Is the RSO fulfilling his/her duties? Yes No
4. To whom does the RSO report? _____
- D. If the designated contact person for NRC changed, was NRC notified?
- Yes No N/A
- E. Sealed Sources and Devices
1. Does the license authorize all of the NRC regulated radionuclides contained in gauges possessed? Yes No
2. Are the gauges as described in the Sealed Source and Device (SSD) Registration Certificate or Sheet? Yes No
3. Have copies of (or access to) SSD Certificates? Yes No
4. Have manufacturers' or distributors manuals for operation and maintenance?
[10 CFR 32.210] Yes No
5. Are the actual uses of gauges consistent with the authorized uses listed on the license? Yes No



SABIA[®] INC

2300 N. Yellowstone Hwy
Idaho Falls, ID 83401
Bus: 208-528-8878
Fax: 208-528-8880

Industrial Radiology Specialists
NRC License # 11-27727-01

www.sabiainc.com

E. Sealed Sources and Devices (continued)

6. Are the location of the gauges compatible with the "Conditions of Normal Use" and "Limitations and/or Other Consideration of Use" on the SSD Registration Certificates? Yes No

Comments:

3. **TRAINING AND INSTRUCTION TO WORKERS**

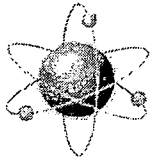
- A. 1. Were all workers who are likely to exceed 100 mrem/year instructed per *10 CFR 19.12*? Yes No N/A

2. Refresher training provided, as needed *10 CFR 19.12*? Yes No
 N/A

3. Records maintained? Yes No N/A

- B. 1. Did each portable gauge operator attend an approved course prior to using the portable gauge? Yes No N/A

2. Did each authorized user of fixed gauges receive training and instruction given at the time of gauge installation or equivalent training and instruction before using gauges? Yes No N/A



SABIA[®] INC

2300 N. Yellowstone Hwy
Idaho Falls, ID 83401
Bus: 208-528-8878
Fax: 208-528-8880

Industrial Radiology Specialists
NRC License # 11-27727-01

www.sabiainc.com

C. Are training records maintained for each gauge operator? Yes No

D. Did interviews with operators reveal that they know the emergency procedures?

Yes No

E. 1. Did this audit include observations of operators using the portable gauge(s) in a field situation? Yes No

If yes, was the operator proficient and safe in:

a. Operating the gauge? Yes No

b. Performing routine cleaning and lubrication? Yes No

c. Transporting gauge? Yes No

d. Storing gauge? Yes No

2. Did this audit include observations of authorized users operating the fixed gauge(s)? Yes No

If yes, was the operator proficient in:

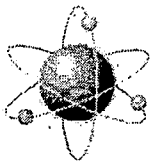
a. Operating the gauge? Yes No

b. Performing routine cleaning and lubrication? Yes No

F. HAZMAT training provided, as required? [49 CFR 172.700, 701, 702, 703, 704]

Yes No N/A

Comments:



SABIA[®]INC

2300 N. Yellowstone Hwy
Idaho Falls, ID 83401
Bus: 208-528-8878
Fax: 208-528-8880

Industrial Radiology Specialists
NRC License # 11-27727-01

www.sabiainc.com

4. RADIATION SURVEY INSTRUMENTS

A. Does the licensee possess a survey meter? Yes No

1. If yes, does it meet the NRC's criteria? **[10 CFR 20.1501]** Yes No

2. If yes, are calibration records maintained? **[10 CFR 20.2103(a)]** Yes No

3. If no, is a survey meter readily available? Yes No

5. GAUGE INVENTORY

A. Is a record kept showing the receipt of each gauge? **[10 CFR 30.51(a)(1)]**

Yes No

B. Are all gauges physically inventoried every six months? Yes No

C. Are records of inventory results maintained? Yes No

Comments:

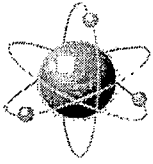
6. PERSONNEL RADIATION PROTECTION

A. Are ALARA considerations incorporated into the radiation protection program?

[10 CFR 20.1101(b)] Yes No

B. Were prospective evaluations performed showing that unmonitored individuals

receive less than 10% of the limit? Yes No



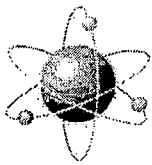
SABIA[®] INC

2300 N. Yellowstone Hwy
Idaho Falls, ID 83401
Bus: 208-528-8878
Fax: 208-528-8880

Industrial Radiology Specialists
NRC License # 11-27727-01

www.sabiainc.com

- C. Did unmonitored users' activities change during the year which could put them over 10% of the limit? Yes No
- D. If yes to C. above, was a new evaluation performed? Yes No
- E. Is external dosimetry required (individuals likely to receive greater than 10% of the limit)? Yes No N/A
1. Is dosimetry provided to required users? Yes No N/A
2. Is the dosimetry supplier NVLAP approved? **[10 CFR 20.1501©]**
 Yes No N/A
3. Are the dosimeters exchanged at the correct frequency? Yes No N/A
4. Are dosimetry reports reviewed by the RSO when they are received?
 Yes No N/A
5. Completion of NRC Forms or equivalent **[10 CFR 20.2104(d), 2106©]**
- a. NRC-4 "Cumulative Occupational Exposure History"
 Yes No N/A
- b. NRC-5 "Occupational Exposure Record for a Monitoring Period"
 Yes No N/A
6. Declared pregnant worker / embryo / fetus
- a. If a worker declared her pregnancy, did the licensee comply with **[10 CFR 20.1208]**? Yes No N/A
- b. Were records kept of embryo/fetus dose per **[10 CFR 20.2106(e)]**
 Yes No N/A



SABIA[®] INC

2300 N. Yellowstone Hwy
Idaho Falls, ID 83401
Bus: 208-528-8878
Fax: 208-528-8880

Industrial Radiology Specialists
NRC License # 11-27727-01

www.sabiainc.com

F. Are records of exposures, surveys, monitoring, and evaluations maintained?

[10 CFR 20.2102, 2103, 2106] Yes No

Comments:

7. PUBLIC DOSE

A. Is public access to gauges controlled in a manner to keep doses below 100 mrem in a year? [10 CFR 20.1301(a)(1)] Yes No

B. Has a survey or evaluation been performed per [10 CFR 20.1501(a)]?

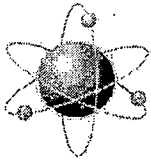
Yes No

1. Have there been any additions or changes to the storage, security, or use of surrounding areas that would necessitate a new survey or evaluation?

Yes No

C. Do unrestricted area radiation levels exceed 2 mrem in any one hour? [10 CFR 20.1301(a)(2)]? Yes No

D. Is gauge access controlled in a manner that would prevent unauthorized use or



SABIA INC

2300 N. Yellowstone Hwy
Idaho Falls, ID 83401
Bus: 208-528-8878
Fax: 208-528-8880

Industrial Radiology Specialists
NRC License # 11-27727-01

www.sabiainc.com

removal? [10 CFR 20.1801] Yes No

E. Records maintained? [10 CFR 20.2103, 2107] Yes No

8. OPERATING AND EMERGENCY PROCEDURES

A. Have operating and emergency procedures been developed? Yes No

B. Do they contain the required elements? Yes No

C. Does each individual working with the gauges have a current copy of the operating and emergency procedures (including lock-out procedures and emergency telephone numbers)? Yes No

D. Is a lock-out warning sign posted at each entryway to an area where it is possible to be exposed to the beam? Yes No N/A

E. Did any emergencies occur? Yes No

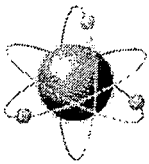
1. If so, were they handled properly? Yes No

2. Were appropriate corrective actions taken? Yes No

3. Was NRC notification or reporting required? [10 CFR 20.2201, 22202, 2203]

Yes No

Comments:

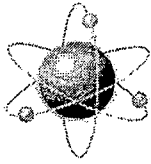


9. LEAK TESTS

- A. Was each sealed source leak tested every 6 months or at other prescribed intervals?
 Yes No
- B. Was the leak test performed as described in correspondence with the NRC and according to the license? Yes No
- C. Are records of results retained with the appropriate information included?
 Yes No
- D. Were any sources found leaking? Yes No
If yes, was NRC notified? Yes No

10. MAINTENANCE OF GAUGES

- A. Are manufactures' or distributors' procedures followed for routine cleaning and lubrication of gauge? Yes No
- B. Was each on-off mechanism tested for proper operation every 6 months or at other prescribed intervals? Yes No
- C. Does the source or source rod remain attached to the portable gauge's during cleaning? Yes No N/A
- D. Is non-routine maintenance performed where the source or source rod is detached from the portable gauge? Yes No N/A
- E. Has repair and maintenance of components related to the radiological safety of



SABIA[®] INC

2300 N. Yellowstone Hwy
Idaho Falls, ID 83401
Bus: 208-528-8878
Fax: 208-528-8880

Industrial Radiology Specialists
NRC License # 11-27727-01

www.sabiainc.com

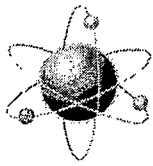
fixed gauge's been performed? Yes No

- F. If yes to D. or E. above, was it performed according to license requirements (e.g., extent of work, individuals performing the work, procedures, dosimetry, survey instrument, compliance with *[10 CFR 20.1301]* limits)? Yes No

Comments:

11. TRANSPORTATION N/A

- A. DOT-7A or other authorized packages used? *[49 CFR 173.415, 416(b)]*
 Yes No
- B. Package performance test records on file? Yes No
- C. Special form sources documentation? *[49 CFR 173.476(a)]* Yes No
- D. Package has 2 labels (ex. Yellow-II) with TI, Nuclide, Activity, and Hazard Classification? *[49 CFR 172.403, 173.441]* Yes No
- E. Package properly marked? ? *[49 CFR 172.301, 304, 310, 324]* Yes No
- F. Package closed and sealed during transport? *[49 CFR 173.475(f)]* Yes No



SABIA[®] INC

2300 N. Yellowstone Hwy
Idaho Falls, ID 83401
Bus: 208-528-8878
Fax: 208-528-8880

Industrial Radiology Specialists
NRC License # 11-27727-01

www.sabiainc.com

G. Shipping papers prepared and used? **[49 CFR 172.200(a)]** Yes No

H. Shipping papers contain proper entries? **[49 CFR 172.200, 201, 202, 203, 204, 604]**

1. Shipping name? Yes No

2. Hazard class? Yes No

3. Identification number (UN number)? Yes No

4. Total quantity? Yes No

5. Package Type? Yes No

6. Nuclide(s)? Yes No

7. RQ? Yes No

8. Radioactive material? Yes No

9. Physical and chemical form? Yes No

10. Activity? Yes No

11. Category of label? Yes No

12. TI? Yes No

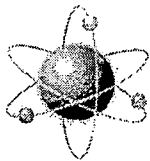
13. Shippers name? Yes No

14. Certification and signature? Yes No

15. Emergency response phone number? Yes No

16. Cargo aircraft only (if applicable)? Yes No N/A

I. Shipping papers within drivers reach and readily accessible during transport? **[49**



SABIA[®] INC

2300 N. Yellowstone Hwy
Idaho Falls, ID 83401
Bus: 208-528-8878
Fax: 208-528-8880

Industrial Radiology Specialists
NRC License # 11-27727-01

www.sabiainc.com

CFR 177.817(e)] Yes No

J. Package secured against movement? **[49 CFR 177.834]** Yes No

K. Placarded on vehicle, if required? **[49 CFR 172.504]** Yes No N/A

L. Proper overpacks, if used? **[49 CFR 173.25]** Yes No N/A

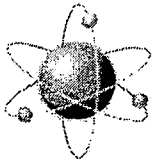
M. Any incidents reported to DOT? **[49 CFR 171.15, 16]** Yes No

Comments:

12. AUDITOR'S INDEPENDENT SURVEY MEASUREMENTS (IF MADE)

A. Describe the type, location and results of measurements. Not made

TYPE	LOCATION	RESULTS



SABIA[®] INC

2300 N. Yellowstone Hwy
Idaho Falls, ID 83401
Bus: 208-528-8878
Fax: 208-528-8880

Industrial Radiology Specialists
NRC License # 11-27727-01

www.sabiainc.com

B. Do any radiation levels exceed regulatory limits? Yes No

13. NOTIFICATION AND REPORTS

A. Was any radioactive material lost or stolen? Yes No

If yes, were reports made? [10 CFR 20.2201, 30.50] Yes No

B. Did any reportable incidents occur? Yes No

If yes, were reports made? [10 CFR 20.2202, 30.50] Yes No

C. Did any overexposures and high radiation levels occur? Yes No

If yes, was it reported? [10 CFR 20.2203, 30.50] Yes No

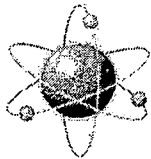
If any events (as described in items A through C above) did occur, what was the root cause?

Were corrective actions appropriate? Yes No

E. Is the licensee aware of the telephone number for NRC Emergency Operations Center? [(301) 816-5100] Yes No

14. POSTING AND LABELING

A. NRC-Form 3 "Notice to Workers" posted? [10 CFR 19.11] Yes No



SABIA[®] INC

2300 N. Yellowstone Hwy
Idaho Falls, ID 83401
Bus: 208-528-8878
Fax: 208-528-8880

Industrial Radiology Specialists
NRC License # 11-27727-01

www.sabiainc.com

B. NRC regulations, license documents posted or a notice posted? **[10 CFR 19.11]**

Yes No

C. Other posting and labeling? **[10 CFR 20.1902, 1904]** Yes No N/A

Comments:

15. RECORD KEEPING FOR DECOMMISSIONING

A. Records kept of information important to decommissioning? **[10 CFR 30.35(g)]**

Yes No

B. Records include all information outlined? **[10 CFR 30.35(g)]** Yes No

16. BULLETINS AND INFORMATION NOTICES

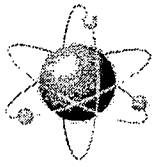
A. NRC Bulletins, NRC Information Notices, NMSS Newsletters received?

Yes No

B. Appropriate training and action taken in response? Yes No

17. SPECIAL LICENSE CONDITIONS OR ISSUES

A. Did auditor review special license conditions or other issues (e.g., non-routine maintenance)? Yes No



SABIA[®] INC

2300 N. Yellowstone Hwy
Idaho Falls, ID 83401
Bus: 208-528-8878
Fax: 208-528-8880

Industrial Radiology Specialists
NRC License # 11-27727-01

www.sabiainc.com

Comments:

18. DEFICIENCIES IDENTIFIED IN AUDIT; CORRECTIVE ACTIONS

Summarize problems/deficiencies identified during audit.

See cover Letter



2300 N. Yellowstone Hwy
Idaho Falls, ID 83401
Bus: 208-528-8878
Fax: 208-528-8880

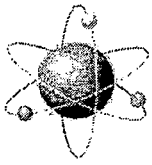
Industrial Radiology Specialists
NRC License # 11-27727-01

www.sabiainc.com

If problems/deficiencies identified in this audit, describe corrective actions planned or taken.

C. Are corrective actions planned or taken at ALL licensed locations (not just location audited)? Yes No

D. Provide any other recommendations for improvement.



SABIA[®] INC

2300 N. Yellowstone Hwy
Idaho Falls, ID 83401
Bus: 208-528-8878
Fax: 208-528-8880

Industrial Radiology Specialists
NRC License # 11-27727-01

www.sabiainc.com

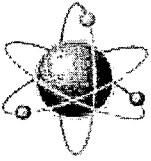
19. EVALUATION OF OTHER FACTORS

A. Is senior licensee management appropriately involved with the radiation protection program and/or RSO oversight? Yes No

B. Does RSO have sufficient time to perform his/her radiation safety duties?
 Yes No

C. Does licensee have sufficient staff to support the radiation protection program?
 Yes No

Comments:



SABIA INC

2300 N. Yellowstone Hwy
Idaho Falls, ID 83401
Bus: 208-528-8878
Fax: 208-528-8880

Industrial Radiology Specialists
NRC License # 11-27727-01

www.sabiainc.com

November 17, 2006

ICG Baybeck
353 Baylor Drive
Eccles, WV 25836

Attn: Basil McKinney

LEAK TEST CERTIFICATES & SEMI-ANNUAL INVENTORY

To meet the requirements of the U.S. NRC and Agreement States concerning semi-annual inventories of radioactive materials, the following radioactive sources are considered present and accounted for as per the leak test certificates.

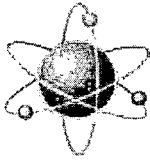
One device were inventoried and leak tested on October 31, 2006 at the ICG Baybeck Prep Plant, located in Eccles, WV .

Please find the attached certificate (if necessary) to account for each device and removable contamination below allowable limits.

The next inventory is due April 30, 2007. The next leak test is due October 30, 2009. If you have any questions or concerns, please call myself at (304) 733-6131.

Sincerely,

John W. Hagley



SABIA INC

2300 N. Yellowstone Hwy
Idaho Falls, ID 83401
Bus: 208-528-8878
Fax: 208-528-8880

Industrial Radiology Specialists
NRC License # 11-27727-01

www.sabiainc.com

Nuclear Source Leak Test Report

Company Name: ICG-Baybeck Prep Plant	Customer's Instrument Model and S/N: Berthold LB 7440 SN: LB7440-63-1
Address: 353 Baylor Drive Eccles, WV 25836	Date of Leak Test: 10-31-06
Site Contact: Basil McKinney Phone Number: 304-253-5454	SABIA Engineer Name: John Hagley Signature: <i>John W. Hagley</i>
List all instruments used to perform the leak test:	
<u>Instrument</u> SE International Radiation Alert	<u>Model</u> Inspector 08644
<u>Serial Number</u> 08644	
Reason for Leak Test: Commission Decommission Refurbishment Periodic Wipe X Other _____	
Shutter Check: Pass Fail X N/A	

Test Results :

Sealed Source Serial Number Cs-137	Source Activity Level milliCi	Smear Contamination Levels
LB7440-63-1	50	< 0.005 uCi
Sealed Source Serial Number Cf-252	Source Activity Level µgrams	Smear Contamination Levels
Sealed Source Serial Number Am-241	Source Activity Level milliCi	Smear Contamination Levels

The Leak Test results documented by this report were obtained using a wipe (smear with a cloth patch) test in accordance with ANSI N5.10 – 1968 Appendix Section B2.1. A nuclear source such as the Cf252, Cs137 and Am241 isotopes tested herein are deemed acceptable by State and Federal authorities if the contamination found on a smear is less than 0.005 microcuries. Alpha, Beta, and Gamma contamination is measured in the Cf252 smear and Beta and Gamma in the Cs137 smear.

CON-WAY

STRAIGHT BILL OF LADING

DRIVER PLEASE NOTE
IF SINGLE SHIPMENT
CHECK BOX BELOW

SHIPPER
PLEASE



D UNLESS MARKED COLLECT
 COLLECT

K

ORIGINAL - NOT NEGOTIABLE

PRO NO. **400-586211**

Driver's signature acknowledges receipt of freight only. Unless otherwise agreed to under separate contract, terms and conditions of tariff CONWAY 199 apply.

CCX

MM 2902 11 EDI/SPCL DEST SIC

DATE 1/24/07		P.O. NO.		SHIPPER NO.	
CUSTOMER'S SPECIAL REFERENCE NUMBER					
SHIPPER (FROM) ICG Coal - Bayback Prep Plant 353 Baylor Drive Eccles, WV25836 CITY, STATE/PROVINCE, ZIP/POSTAL CODE (TELEPHONE) 304-253-5454			CONSIGNEE (TO) SABIA, Inc 2300 North Yellowstone Hwy Bay #3 Idaho Falls, ID 83401 CITY, STATE/PROVINCE, ZIP/POSTAL CODE (TELEPHONE) 208-528-8878		
BILL TO SABIA, INC 7944 Convoy Ct SAN DIEGO, CA 92111 CITY, STATE/PROVINCE, ZIP/POSTAL CODE (TELEPHONE) 858-279-4000			CUSTOMS BROKER		
ACCOUNT CODE					
<input type="checkbox"/> CON-WAY Guaranteed!			<input type="checkbox"/> CON-WAY DEFERRED		
NUMBER SHIPPING UNITS	MM	KIND OF PACKAGING, DESCRIPTION OF ARTICLES, SPECIAL MARKS AND EXCEPTIONS	NMFC NO.	CLASS OR DENSITY OF ARTICLES	WEIGHT (Subject to Convention) □ lb □ kg
1	X	Radioactive Material, Type A Package, Non Special Form Non Fissile, Class 7, UN2915, Cesium Chloride as a metallic solid, USA DOT 7A Type A Packages Packed in Overpack X 0.188 GBQ TI 007 white I	164900-2	100	50
Emergency Contact: Chemtrec 800-424-9300					
COD AMOUNT: \$ _____		COD <input type="checkbox"/> Prepaid Fee: <input checked="" type="checkbox"/> Collect		REMIT COD TO:	
<input type="checkbox"/> U.S. <input type="checkbox"/> Canadian		ADDRESS:			
NOTE: Consignee's company check made payable to the Shipper will be accepted by Con-Way and forwarded to shipper unless otherwise directed to do so by the shipper.					
CITY:		STATE/PROVINCE		ZIP/POSTAL CODE	

Notice: Unless the Shipper completes the requirements as provided below, Carrier's liability shall be limited as stated herein and in Tariff CONWAY-189, which may be obtained by request. Carrier shall in no event be liable for loss of profit, income, interest, attorney fees, or any special, incidental or consequential damages. Where the rate or NMFC classification is dependent on value, shippers are required to state specifically in writing the declared value of the property. For this purpose the declared value of the property is hereby specifically stated by the Shipper to be not exceeding \$ _____. Also, paragraph number 2 on the reverse side of this Bill of Lading sets forth released value terms and conditions.

Carrier liability with shipment originating within the United States: Unless the Shipper declares excess value on the Bill of Lading, requests excess liability coverage and pays an additional charge, Carrier's maximum liability is \$25 per pound per individual lost or damaged piece within the shipment, subject to \$150,000 maximum total liability per shipment, and provided further that Carrier's liability on household goods, articles other than new articles, such as used and/or refurbished articles, or personal effects shall not exceed ten cents per pound per individual lost or damaged piece within the shipment. For this purpose the declared value of the property is hereby specifically stated by the Shipper to be \$ _____, and Shipper agrees to pay an additional charge for excess liability coverage. Total declared value may not exceed \$850,000 per shipment.

Carrier liability with shipment originating within Canada: Unless the Shipper agrees to a Special Agreement, declares the value in the box below and agrees to pay the excess liability charge by initiating where indicated, Carrier's maximum liability is CAN\$2 per pound (CAN\$4.41 per kilogram) per individual lost or damaged piece within the shipment, subject to a maximum total liability per shipment of CAN\$20,000, and provided further that Carrier's liability on household goods, used and/or refurbished articles, or personal effects shall not exceed ten cents (CAN) per pound per individual lost or damaged piece within the shipment.

SPECIAL AGREEMENT: Declared Value: CAN \$ _____ per pound. (Declared value may not exceed CAN \$100,000 per shipment.)
Shipper agrees to pay excess liability charge: _____ (Shipper's Initials)

COMMODITY DESCRIPTION(S): By signing this Bill of Lading, I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/prepacked, and are in all respects in proper condition for transport according to applicable international and national governmental regulations.

Shipment Received: The shipment is received subject to Tariff CONWAY-189, Carrier's pricing schedules, terms, conditions and rules maintained at Carrier's general offices in effect on the date of issue of this Bill of Lading, as well as the National Motor Freight Classifications, the Hazardous Materials Transportation Regulations (Title 49 - CFR, Subtitle B, Chapter I, Sub Chapter A-C), and the Household Goods Mileage Guide (HHGG 105 Series) for shipments originating in the United States; and the Canadian Motor Vehicle Transport Act, the Transportation of Dangerous Goods Act, and the regulations in force in the provincial jurisdiction at the time and place of the shipment for shipments originating in Canada. The property described on this Bill of Lading is in apparent good order, but only to the extent that it is unobscured and visible without further inspection and except as noted or marked. The property is consigned and destined as indicated above. The word Carrier as defined throughout this contract as meaning any person or corporation in possession of the property under this contract. Carrier agrees to carry the property to its destination, if on its route, otherwise to deliver to another Carrier on the route to said destination. It is mutually agreed as to each Carrier of all or any portion of said route to the destination and as to each party at any time interested in all or any of said property, that every service to be performed hereunder shall be subject to all of this Bill of Lading's terms and conditions in effect on the date of shipment, including, but not limited to, the "Terms and Conditions" listed on the back side of this Bill of Lading.

SHIPPER SABIA, Inc	CARRIER CON-WAY TRANSPORTATION SERVICES, INC. CON-WAY CANADA EXPRESS, INC.
AUTHORIZED SIGNATURE <i>[Signature]</i>	AUTHORIZED SIGNATURE <i>[Signature]</i> DATE 1/25/07

04032-001 (1/02) Lite U.S.A.

(CONW)

NUMBER OF UNITS RECEIVED **1**



2300 N. Yellowstone Hwy
 Idaho Falls, ID 83401
 Bus: 208-528-8878
 Fax: 208-528-8880

Industrial Radiology Specialists
 NRC License # 11-27727-01

www.sabiainc.com

-PACKING LIST-

Sold to:

Ship to: SABIA Inc
 2300 N. Yellowstone Hwy
 Idaho Falls, ID 83401

P.O. #
 FTC contract #
 Shipped VIA

Customer License # (if applicable):

Date Shipped: 01-24-07

FOB:

Source Data: as of

Ser. #	Model #	Content	Output	Contamination/100 sq. cm. (per source)
63-1	LB-7440	Cs-137	188 MBq	alpha < 9 x 10 (exp-6) μ beta/gamma < 45 x 10 (exp-6) μ

Shipping Container: US-DOT 7A Type A
 Model # Overpack Ser #

Wt.

Seal # FTC

Radiation levels:	gamma	neutron	total	
Surface:	0.3	+ N/A	= 0.3	mRem
At one meter:	20.1	+ N/A	= < 0.1	mRem (TI)

Instrument ser #: Ludlum Model 2401 SN:204299

Contamination level: alpha < 9 x 10 (exp-6) micro curies/100 sq. cm.
 beta/gamma < 45 x 10 (exp-6) micro curies/100 sq. cm.

NOTICE: A radiation safety specialist should be present when this container is opened.

CERTIFICATIONS:

SPECIAL FORM: At the time of shipment the sources in this shipment met the requirements for special form.

LEAK TEST: The sources in this shipment have passed the helium bubble pressure leak test.

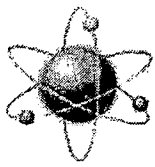
The products covered by this document are certified to meet the requirements of the contract.

Field
 Engineer

[Handwritten Signature]

Date

1-24-07



SABIA INC

2300 N. Yellowstone Hwy
Idaho Falls, ID 83401
Bus: 208-528-8878
Fax: 208-528-8880

Industrial Radiology Specialists
NRC License # 11-27727-01

www.sabiainc.com

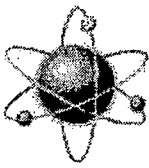
Nuclear Source Leak Test Report

Company Name: ICG-Baybeck Prep Plant	Customer's Instrument Model and S/N: Berthold LB 7440 SN: LB7440-63-1
Address: 353 Baylor Drive Eccles, WV 25836	Date of Leak Test: 01-24-07
Site Contact: Basil McKinney Phone Number: 304-253-5454	SABIA Engineer Name: John Hagley Signature: <i>John W. Hagley</i>
List all instruments used to perform the leak test:	
<u>Instrument</u> SE International Radiation Alert	<u>Model</u> Inspector <u>Serial Number</u> 08644
Reason for Leak Test: Commission <input type="checkbox"/> Decommission <input checked="" type="checkbox"/> Refurbishment <input type="checkbox"/> Periodic Wipe <input type="checkbox"/> Other <input type="checkbox"/> _____	
Shutter Check: Pass <input type="checkbox"/> / Fail <input checked="" type="checkbox"/> N/A <input type="checkbox"/> Permanently in the OFF position	

Test Results :

Sealed Source Serial Number Cs-137 LB7440-63-1	Source Activity Level milliCi 50	Smear Contamination Levels < 0.005 uCi
Sealed Source Serial Number Cf-252	Source Activity Level µgrams	Smear Contamination Levels
Sealed Source Serial Number Am-241	Source Activity Level milliCi	Smear Contamination Levels

The Leak Test results documented by this report were obtained using a wipe (smear with a cloth patch) test in accordance with ANSI N5.10 – 1968 Appendix Section B2.1. A nuclear source such as the Cf252, Cs137 and Am241 isotopes tested herein are deemed acceptable by State and Federal authorities if the contamination found on a smear is less than 0.005 microcuries. Alpha, Beta, and Gamma contamination is measured in the Cf252 smear and Beta and Gamma in the Cs137 smear.



SABIA INC

2300 N. Yellowstone Hwy
Idaho Falls, ID 83401
Bus: 208-528-8878
Fax: 208-528-8880

Industrial Radiology Specialists
NRC License # 11-27727-01

www.sabiainc.com

RADIOACTIVE SOURCE SHIPMENT SURVEY RECORD

A. Source Data

1. Type of Source: Cs-137
2. Quantity of Sources: 1
3. Type of radiation emitted: Alpha, Beta, Gamma
4. Source Identification: LB7440-63-1

B. Shipping Package Data

1. Type: DOT 7A Type A
2. Model No.:
3. Serial No.:
4. Approx. Weight: 50 lbs

C. Radiological Control

1. Container Survey – Contamination, mCi/100 sq. cm.
Outer Surface:
2. Container Survey – Radiation, mRem/hr.

<u>Surface</u>	<u>1 Meter from Surface</u>
Gamma - 0.3	Gamma - <0.1
Neutron - N/A	Neutron - N/A
Total = 0.3	Total = <0.1

* TI = <0.1 (* = transport index when rounded to next higher tenth) 49CFR173.389(i)

Survey Instruments Used:

Gamma: Ludlum

Neutron: N/A

Model#

2401-EC

SN#

204299

D. Name and Address of Shipper:

SABIA, Inc
2300 N. Yellowstone Hwy.
Idaho Falls, ID 83401

E. Name and Title of Person Generating Form:

John W. Hagley
Sr. Field Service Engineer



2300 N. Yellowstone Hwy
Idaho Falls, ID 83401
Bus: 208-528-8878
Fax: 208-528-8880

Industrial Radiology Specialists
NRC License # 11-27727-01

www.sabiainc.com

24 Hr Response (800) 424-9300

EMERGENCY RESPONSE INFORMATION RADIATION SOURCES

Source: Cs-137 Activity: 188 MBq
Form: Solid Date: 01-24-07
Shipment No. _____ UN Number: 2915
Dose rates: Contact 0.3 Mrem/Hr 3 feet 0.1 Mrem/Hr NOT A FIRE
HAZARD

	Cs-137	Cf-252
Radiation Hazard:	Gamma - dose Beta - contamination	Neutron, Gamma - dose Alpha - contamination
Description:	Cesium Chloride powder double encapsulated in a stainless steel capsule.	Phalladium cermet wire double encapsulated in a stainless steel capsule.
Dimensions:	¼ in. diameter ½ in. length	⅜ in. diameter 1 ½ in. length

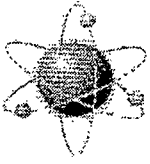
INSTRUCTIONS:

Source Intact

- DO NOT TOUCH SOURCE
- Place source back into the shipping container or a secured storage area. When handling Cs-137 and Cf-252, use remote handling tools (tongs or pliers). The detector assembly can be handled directly.
- When moving the source, keep as much distance as possible between person and the source.

Source Crushed

- DO NOT TOUCH BROKEN CAPSULE OR POWDER
- Rope off area approximately 10 feet around the source.
- Keep personnel away from area to prevent contamination.
- Personnel who may have walked through contaminated area or have accidentally touched the source should be segregated into a holding area to be checked for contamination.
- Notify the Radiological Emergency Response Organization in the area in which the accident occurred.



SABIA[®] INC

2300 N. Yellowstone Hwy
Idaho Falls, ID 83401
Bus: 208-528-8878
Fax: 208-528-8880

Industrial Radiology Specialists
NRC License # 11-27727-01

www.sabiainc.com

Activity Report for Service Performed in the Field

Site Name: (Billing Address) ICG Brybeck Eckes, WV		Contact Name J. Ramsey	PO Number	SABIA Chg #
		Contact Phone #	Distance	Billable (Y/N)
SABIA Eng. Name: J. Hagley		Type of Unit and Pertinent History: Burhold 7440		
Date	Begin	End	Description of Work Done	
1/24				
	10:45		Removed Burhold	
			Picked + Prepared for Shipment	
		1230	Will have crate picked up on 1/25	
Qty	\$Cost	Part #	Description	

Jay Ramsey
Customer Signature

1-24-07
Date