

**From:** [Lawyer, Dennis](#)  
**To:** [sohara@premierenergyserviceswv.com](mailto:sohara@premierenergyserviceswv.com)  
**Subject:** Premier Energy Services LLC, Request for Additional Information Concerning Application for a License Amendment, Control 592122  
**Date:** Thursday, October 27, 2016 6:44:00 AM

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Dear Mr. O'Hara,

This is in reference to your application dated October 7, 2016, requesting for amendment to Nuclear Regulatory Commission License No. 47-35262-01, Docket No. 03038861. Since you are adding portable gauges to a radiography license, the commitments for certain areas are sufficient for all your material, however many commitments were specific to just radiographers and not to gauge users. Areas of material inventory and leak test performance was sufficient to be used for the gauges also, however you may wish to review these commitments and make other statements in case you wish make a specific commitment associated with the gauge use different than your radiography devices. In order to continue our review, we need the following additional information:

Please confirm that you wish to be licensed for two nuclear density gauges Humbolt Scientific, Inc. Model 5001 with only Cs-137 source and not the Am-241 sources. According to the Sealed source and device registry they have a maximum of 11 mCi of activity so confirm you wish to be licensed for 22 mCi of Cs-137.

Item 6 of the application form is to state the purpose the material will be used. Please state the purpose you wish to be licensed for this material.

You did not give your Radiation Safety Officer's training for portable gauges. NUREG-1556, Volume 1, Revision 2, "Consolidated Guidance About Materials Licenses Program-Specific Guidance About Portable Gauge Licenses," section 8.7 states to provide documentation demonstrating that the proposed RSO is qualified by training and experience (e.g., certificate of completion of the RSO's course and/or the authorized user's course). Please provide training documentation associated with gauge use.

You did not provide how portable gauge users would be trained. NUREG-1556, Volume 1, Revision 2, "Consolidated Guidance About Materials Licenses Program-Specific Guidance About Portable Gauge Licenses," section 8.8 for the applicant to provide the statement "Before using licensed materials, authorized users will have successfully completed one of the training courses described under "Criteria" in the section titled "Training for Individuals Working in or Frequenting Restricted Areas" in NUREG--1556, Volume 1, Revision 2, 'Consolidated Guidance About Materials Licenses: Program-Specific Guidance About Portable Gauge License.'" Or a description of the training for proposed authorized users. Please provide this statement for personnel that will use portable gauges and the training for radiography has already been provided.

You did not provide facility information. It is unclear if you will store this material with your radiography sources or in another section of your facility. NUREG-1556, Volume 1, Revision 2, "Consolidated Guidance About Materials Licenses Program-Specific Guidance About Portable Gauge Licenses," section 8.9 states to provide a facility diagram for each permanent portable gauge storage location. Include on the

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diagram the use of adjacent areas (including above and below), and information relevant to public dose and security as discussed in Sections 8.10.5, "Public Dose," and 8.10.6, "Operating, Emergency, and Security Procedures," respectively, in NUREG-1556, Vol. 1, Rev. 2, "Consolidated Guidance About Materials Licenses: Program-Specific Guidance About Portable Gauge Licenses." Please provide this information for your gauge storage.

Your previous application only contained a commitment for monitoring radiographic personnel. NUREG-1556, Volume 1, Revision 2, "Consolidated Guidance About Materials Licenses Program-Specific Guidance About Portable Gauge Licenses," section 8.10.4 states "We will maintain, for inspection by the NRC, documentation demonstrating that unmonitored individuals are not likely to receive a radiation dose in excess of the limits in 10 CFR 20.1502(a)." or the statement: "We will provide and require the use of individual monitoring devices (dosimetry). All personnel dosimeters that require processing to determine the radiation dose will be processed and evaluated by a NVLAP-approved processor." Please provide one or the other statement for gauge users.

You did not provide statements associated with operating, emergency procedures associated with portable gauges. NUREG-1556, Volume 1, Revision 2, "Consolidated Guidance About Materials Licenses Program-Specific Guidance About Portable Gauge Licenses," section 8.10.6 says to state, "We will implement and maintain operating, emergency, and security procedures in Appendix G to NUREG-1556, Volume 1, Revision 2, "Consolidated Guidance About Materials Licenses: Program-Specific Guidance About Portable Gauge Licenses." Copies of these procedures will be provided to all gauge users and will be available at each jobsite." or state "Operating, emergency, and security procedures will be developed, implemented, and maintained and will meet the criteria in section 8.10.6, "Radiation Safety Program—Operating, Emergency, and Security Procedures," NUREG-1556, Volume 1, Revision 2, "Consolidated Guidance About Materials Licenses: Program-Specific Guidance About Portable Gauge Licenses." Copies of these procedures will be provided to all gauge users and will be available at each jobsite." or provide alternative procedures, and the statement, "Copies of these procedures will be provided to all gauge users and will be available at each jobsite." Please provide one of these statements for gauge use.

You did not provide a description of routine and non-routine maintenance on portable gauges. NUREG-1556, Volume 1, Revision 2, "Consolidated Guidance About Materials Licenses Program-Specific Guidance About Portable Gauge Licenses," section 8.10.6 says for routine cleaning and lubrication: Submit either of the following: the statement: "We will implement and maintain procedures for routine maintenance of our gauges according to each manufacturer's written recommendations and instructions" or alternative procedures for NRC review.

For non-routine maintenance or repair operations that require detaching the source or source rod from the gauge: Submit either of the following: the statement: "The gauge manufacturer, or other person licensed by the NRC or an Agreement State will perform non-routine maintenance or repair operations that require detaching the source or source rod from the gauge." or a request to perform this work "in-house," using the information in Appendix F of this NUREG to support the request. Please make statement for routine and non-routine maintenance of portable gauges.

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. 592122. If you have technical questions regarding this letter, please call me at (610) 337-5366.

Your reply must be an originally signed and dated letter. The letter may be scanned and submitted as a pdf document attached to an email; or it may be transmitted by facsimile to (610) 337-5269; or it may be sent by regular mail. If we do not receive a reply from you within 30 calendar days from the date of this e-mail, we will assume that you do not wish to pursue your application OR amendment request.

Please respond by e-mail to acknowledge that you have received the e-mail request for additional information.

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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Dennis Lawyer  
U.S. NRC Region 1  
Health Physicist  
610-337-5366