

J-6



**FAX**

TO: DENNIS LAWYER NRC

FAX NUMBER: 610-337-5269

FROM: SEAN DHARA RSO

FAX NUMBER: 304.624.3106

DATE: 12/20/16

REGARDING: LIC# 47-35262-01 DOCKET# 03038801

NUMBER OF PAGES: 4 INCLUDING COVER

PHONE NUMBER: 304.624.0989

**COMMENTS:**

PREMIER ENERGY SERVICES, LLC  
 PO BOX 97 CLARKSBURG, WV 26301  
 PHONE 304.624.0989 | FAX 304.624.3106  
 PREMIERENERGYSERVICESWV.COM

592122

This is in reference to our application dated October 7, 2016, requesting for amendment to Nuclear Regulatory Commission License No. 47-35262-01, Docket No. 03038861.

We would like to be licensed for 2 (two) nuclear density gauges Humbolt Scientific Model 5001-SD with Cs-137 sealed source # Humbolt 2200064 not to exceed 11 millicuries per source, and Am-241 sealed source # Humbolt 2200067 not to exceed 44 millicuries per source. Totals: 22 mCi of Cs-137 and 88mCi of Am-241.

The gauges will be used for the purpose of testing density of materials such as soil and asphalt.

The Radiation Safety Officer's training specific to Portable Gauge Licenses for myself, Sean E. O'Hara is attached.

All users of Portable Gauges will be trained before using licensed material in accordance with NUREG-1556 Vol. 1 at Humbolt Scientific. Training is to include;

- Atomic Theory
- Radiation Safety
- Dose/Shielding Calculations
- Accidents/Storage
- Operation
- Field Applications
- Transportation
- Risk
- ALARA
- Measurement Theory
- Calibration
- Maintenance

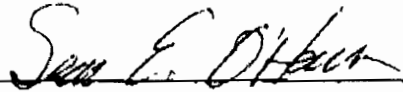
The portable gauges will be stored within our vault with our other radiography sources. Even with the addition of the portable gauges, the public dose on the outside of the vault and adjacent areas calculates to well below 100mR/yr. As the already existing diagram included with our original license demonstrates.

We will provide and require the use of individual monitoring devices (dosimetry). All personal dosimeters that require processing to determine the radiation dose will be processed and evaluated by a NVLAP approved processor.

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.

We will implement and maintain procedures for routine maintenance of our gauges according to each manufacturer's written recommendations and instructions.

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.



---

Date: 12/20/16

**Sean E. O'Hara**

General Manager / Radiation Safety Officer

**PREMIER**

P.O. Box 67  
Clarksburg, WV 26302  
C: 304-672-3588  
O: 304-624-0989  
F: 304-624-3106



**HUMBOLDT SCIENTIFIC, INC.**  
**RSO Certification**

***Sean O'Hara***

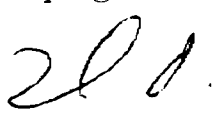
**HAS SUCCESSFULLY COMPLETED A CERTIFIED  
RADIATION SAFETY OFFICER COURSE**

Subjects included were:

*RSO Duties and Responsibilities*  
*Radiation Safety Practices*  
*Regulatory Requirements*  
*Dose/Shielding Requirements*  
*Accidents/Storage*  
*Regulatory Guidance (NUREG-1556, Vol. 1)*  
*Transportation/HAZMAT Requirements*

*Risk*  
*ALARA*  
*Radiation Measurement*  
*Operating and Emergency Procedures*  
*Calibration and Maintenance*  
*Record Keeping*

Date of Training: **November 18, 2016**  
Location: **Glen Allen, VA**  
Certificate Number: **10049**  
HAZMAT Expiration Date: **November 18, 2019**

  
\_\_\_\_\_  
Instructor: **Keith Earnshaw**  
**Humboldt Scientific, Inc.**  
**2525 Atlantic Ave**  
**Raleigh, NC 27604**