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STATE OF NEVADA

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Chief Medical Officer

DEPARTMENT OF HEALTH AND HUMAN SERVICES  
DIVISION OF PUBLIC AND BEHAVIORAL HEALTH  
Bureau of Preparedness, Assurance, Inspections and Statistics  
Radiation Control Program  
675 Fairview Drive, Suite 218  
Carson City, Nevada 89701  
Telephone: (775) 687-7550 · Fax: (775) 687-7552

December 22, 2016

Best Theratronics Ltd.  
Attn: Samantha Mason, RSO  
7643 Fullerton Road  
Springfield, VA 22153

Re: a. Reciprocity request dated December 06, 2016  
b. NRC Radioactive Material License No. 45-31299-01/03037620

Dear Ms. Mason:

In accordance with your request (reference a.) and pursuant to Nevada Administrative Code (NAC) 459.210, you are hereby authorized to use radioactive material at temporary job sites anywhere in Nevada where the Radiation Control Program (RCP) maintains jurisdiction for regulating the use of radioactive material. Such use shall be conducted in accordance with NAC Chapter 459 and your Radioactive Material License (reference b.).

You are further required to notify our office by facsimile or by letter at least 3 business days before engaging in the proposed activity and receive written permission from the RCP to proceed with the proposed activity. All licensed radioactive material is subject to inspection at any time while in the state of Nevada.

**SPECIAL CONDITIONS** (checked conditions are applicable to this reciprocity authorization):

- The authorization contained herein is not effective after December 31, 2017, or 180 possession days in a calendar year, whichever occurs earlier. The licensee shall submit to the RCP a written request for reconciliation, by facsimile or mail within seven days of completion of authorized use, detailing any reciprocity days not used. Otherwise, all days requested will be deducted from the 180 possession days originally authorized. Documentation should accompany the request to verify actual days in Nevada.
- A copy or electronic access to the following documents must be in possession by the users of the materials/devices:
  1. This letter (The General License),
  2. The current Reciprocity Authorization form,
  3. State of Nevada Radiation Control Incident Information Guide, and
  4. The current version of NAC 459(A copy of NAC 459 is available at: <http://www.leg.state.nv.us/nac/nac-459.html>)

REC'D IN LAT 12/21/2016

NMSS/RGNI MATERIALS-002

- The above period includes transport and setup time within Nevada borders.
- For industrial radiography activities, the revised regulations incorporate the requirements of 10 CFR Part 34, 2008 revision, by reference. This regulation may be obtained at the following web site [http://www.access.gpo.gov/nara/cfr/waisidx\\_09/10cfr34\\_09.html](http://www.access.gpo.gov/nara/cfr/waisidx_09/10cfr34_09.html).
- 10 CFR Part 34.41 requires that a two person crew perform radiography at temporary job sites. One of the individuals must be a radiographer and the other individual must be a radiographer or radiographer's assistant. **Documentation must be carried that shows both individuals are qualified to work under the license.** This may be either a certification card carried by the individual or a list of authorized users carried with the license.
- This reciprocity authorization is subject to the attached "Well Logging Special Conditions" and 459.756-459.7745.
- NAC 459.198.4 requires that "Each person who uses a portable gauge shall use a minimum of two independent physical controls that form tangible barriers to secure the portable gauge from unauthorized removal when the portable gauge is not under the control and constant surveillance of the licensee." More information about this requirement may be found at the following web page: [http://dpbh.nv.gov/Reg/RAM/Radioactive Material Program \(RAM\) - Home/](http://dpbh.nv.gov/Reg/RAM/Radioactive Material Program (RAM) - Home/)

Find enclosed a copy of information requested by our office when a radiological incident or emergency is encountered.

If you have any questions, please contact Michael Schmidt, Radiation Control Specialist, at (775) 687-7530.

Sincerely,



Karen K. Beckley, M.P.A., M.S.  
Manager, Radiation Control Program

Enclosure: a. Nevada Administrative Code (NAC) 459, Reciprocal recognition of licenses  
b. State of Nevada Radiation Control Incident Information Guide

cc: U.S. Nuclear Regulatory Commission, Region I  
Daniel Doorman, Regional Administrator  
Renaissance Park  
2100 Renaissance Boulevard  
King of Prussia, PA 19406

MWS/bes

### **NAC 459.210 - Reciprocal recognition of licenses.**

1. Subject to the provisions of NAC 459.010 to 459.950, inclusive, a person who holds a specific license from the Nuclear Regulatory Commission or an agreement state issued by the agency having jurisdiction where the licensee maintains an office for directing the licensed activity and at which radiation safety records are normally maintained is hereby granted a general license to conduct within this State the activities authorized in the specific license for a period not in excess of 180 days in any calendar year provided that:

(a) The specific license does not limit the activity authorized by the specific license to specified installations or locations.

(b) The out-of-state licensee notifies the Division in writing at least 3 business days before engaging in the proposed activity and receives written permission from the Division to proceed with the proposed activity. The notification must indicate the location, period and type of proposed possession and use within the State, and must be accompanied by a copy of the specific license. If, for a specific case, the 3-day period would impose an undue hardship on the out-of-state licensee, he may apply to the Division and obtain written permission to proceed sooner. The Division may waive the requirement for filing additional written notifications during the remainder of the calendar year following the receipt of the initial notification from a person engaging in activities under the general license.

(c) The out-of-state licensee complies with all applicable regulations of the Division and with all the terms and conditions of his specific license, except any terms and conditions which may be inconsistent with applicable regulations of the Division.

(d) The out-of-state licensee supplies such other information as the Division may request.

(e) The out-of-state licensee must not transfer or dispose of radioactive material possessed or used under the general license provided in this section except by transfer to a person:

(1) Specifically licensed by the Division or by the Nuclear Regulatory Commission to receive such material; or

(2) Exempt from the requirements for a license for such material pursuant to NAC 459.184.

2. A licensee must determine the jurisdiction of a temporary job site at a federal facility before radioactive materials may be used at the temporary job site. If the jurisdiction is unknown, the licensee must contact the federal agency to determine whether the job site is under exclusive federal jurisdiction. The jurisdiction of the job site must be obtained in writing from the federal agency, or the name and title of the person at the federal agency who provided the determination must be recorded along with the date of the determination.

3. Before a licensee may use radioactive material at a temporary job site in another state or at a federal facility, the licensee must obtain authorization, if the job site is:

(a) In another state, from:

(1) That state, if that state is an agreement state; or

(2) The Nuclear Regulatory Commission, by filing for reciprocity or a specific license, if the state is not an agreement state or the job site is within an area of exclusive federal jurisdiction.

(b) At a federal facility, from the Nuclear Regulatory Commission by:

(1) Filing an NRC Form 241 in accordance with 10 C.F.R. § 150.20(b), as those provisions existed on January 26, 1999; or

(2) Filing for a specific license.

4. Any person who holds a specific license issued by the Nuclear Regulatory Commission or an agreement state authorizing the holder to manufacture, transfer, install or maintain a device described in NAC 459.216 within areas subject to the jurisdiction of the licensing body is hereby granted a general license to install, transfer, demonstrate or maintain such a device in this State provided that:

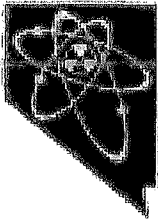
(a) Such person shall file a report with the Division within 30 days after the end of each calendar quarter in which any device is transferred to or installed in this State. Each such report must identify each general licensee to whom such device is transferred by name and address, the type of device transferred and the quantity and type of radioactive material contained in the device;

(b) The device has been manufactured, labeled, installed and maintained in accordance with applicable provisions of the specific license issued to such person by the Nuclear Regulatory Commission or an agreement state;

(c) Such person must assure that any labels required to be affixed to the device under regulations of the authority which licensed manufacture of the device bear a statement that: "Removal of this label is prohibited"; and

(d) The holder of the specific license must furnish to each general licensee to whom he transfers such device or on whose premises he installs such device a copy of the general license contained in NAC 459.216.

5. The Division may withdraw, limit or qualify its acceptance of any specific license or equivalent licensing document issued by another agency, or any product distributed pursuant to the licensing document, upon determining that such action is necessary in order to prevent undue hazard to public health and safety or property.



# Nevada Radiation Control Program



## Attachment A Incident Intake Form

The following information will be extremely helpful to enable the Radiation Control Program to determine emergency actions that should be taken. After you have obtained as much of this information as possible at the time of the first contact by the caller, please contact:

Radiation Control Program 24 Hr. Emergency Number: (877) 438-7231  
Nevada Highway Patrol (24 hrs): (775) 687-0400

1. Caller's Identification:  
Name:  
Location/Affiliation:  
Telephone Number: ( )
2. Location and description of the incident:
3. Why does the first responder think a radiation source is involved?
4. Has the incident area been isolated, barricaded, roped off or otherwise restricted to prevent public entry?
5. Name of the person, trucking company, manufacturing plant, doctor's office, etc. associated with or cause of incident.
6. What kind of radiation source (radioactive material, x-ray, other) is involved?
7. Any indication of the quantity of radioactive material involved? (amount spilled on the ground, size of package in the vehicle, quantity identified on paperwork, etc.)
8. If radioactive material is involved, what type of package(s) is the radioactive material contained in? (55-gallon drums, boxes, vials, casks, etc).
9. Any readings from radiation detection instruments? Who took the measurements? (Type of instrument, scale of measurement, name, agency and telephone number at responder's location).
10. Has Nevada Highway Patrol or local law enforcement agency been notified? Does that agency understand that radioactive material is involved?