



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
REGION IV  
1600 EAST LAMAR BLVD  
ARLINGTON, TEXAS 76011-4511

# EMAIL



**Name:** Peter Adams License: 50-29114-01  
**Organization:** ENI US Operating Company Docket: 030-38377  
**Phone:** 907-865-3352 Control: 592257  
**E-mail Address:** peter.adams@enipetroleum.com  
**From:** Jacqueline D. Cook  
**Date:** January 27, 2017  
**Subject:** Letter dated October 19, 2016 for License Amendment, letter dated January 17, 2017, and email dated January 19, 2017 responses to request for additional information dated December 30, 2016 and January 17, 2017  
**Pages:** 2

Mr. Adams:

Per your letter dated October 19, 2016, for license amendment, letter dated January 17, 2017, and email dated January 19, 2017 responses to request for additional information dated December 30, 2016 and January 17, 2017, the items on the next page are deficiencies which requires your response. **Please respond to this e-mail by Monday, February 27, 2017.** Our fax number is (817) 200-1263. **Please provide a response in a signed and dated letter in pdf format when responding via email. Please note that a representative of the corporation or legal entity filing the amendment must sign and date the response. In addition, please note that the representative signing the letter must be authorized to make binding commitments and to sign official documents on behalf of the applicant.** My email address is [Jackie.Cook@nrc.gov](mailto:Jackie.Cook@nrc.gov). When responding to this e-mail, please include the license, docket, and control numbers located at the top of this page.

Please note that I used NUREG-1556, Volume 4, Rev. 1, "Consolidated Guidance About Materials Licenses: Program-Specific Guidance About Fixed Gauge Licenses", dated July 2016. Please use this guidance when responding to the deficiencies on the following pages. (<https://www.nrc.gov/reading-rm/doc-collections/nuregs/staff/sr1556/v4/>).

Thanking you in advance for your cooperation, assistance, and prompt response in this matter.

/RA/  
Jacqueline D. Cook  
Senior Health Physicist

**PUBLIC**

Immediate Release  
 Normal Release

**NON-PUBLIC**

A.3 Sensitive-Security Related  
 A.7 Sensitive Internal  
 Other: \_\_\_\_\_

Reviewer: \_\_\_\_\_

Date: \_\_\_\_\_

1. Please note that the type of license you have is a fixed gauge license. In your letter dated January 17, 2017, response to our request for additional information dated December 30, 2016, the hazmat training received by Mr. Geoffery Ackerman is from the American Portable Nuclear Gauge Association (APNGA) which is not adequate because you are authorized for fixed gauges. In addition, the course outline for the industrial radiation safety course part 2 Mr. Ackerman received from Alaska Technical Training, Inc. includes industrial radiography topics which are not adequate.

Please note that Mr. Ackerman's training should be expanded to include the following course content as found in Appendix D of NUREG-1556, Vol. 4, Rev. 1, Criteria for Acceptable Training for Authorized Users and Radiation Safety Officers:

A. Radiation Safety

- Location of sealed source within the gauge

B. Regulatory Requirements:

- License conditions, amendment, and renewals
- Locations of use and storage of radioactive materials
- Material control and accountability
- Annual audit of radiation safety program
- Transfer and disposal
- Prior events involving fixed gauges
- Handling incidents
- Recognizing and ensuring that radiation warning signs are visible and legible
- Licensing and inspection by regulatory agency
- Need for complete and accurate information
- Employee protection
- Deliberate misconduct

C. Practical Explanation of the Theory and Operation for Each Gauge Possessed by the Licensee:

- Operating and security procedures
- Routine versus nonroutine maintenance
- Lock-out procedures

D. Supervised, Hands-On Experience (On-the-Job Training) Involving:

- Operating procedures
- Test runs of emergency procedures
- Routine maintenance
- Lock-out procedures