



UNITED STATES
NUCLEAR REGULATORY COMMISSION

REGION IV

611 RYAN PLAZA DRIVE, SUITE 400
ARLINGTON, TEXAS 76011-8064

November 26, 1997

Law Engineering and Environmental Services, Inc.
ATTN: Michael H. Homan
Assistant Vice President
1540 North 107th East Avenue
Tulsa, Oklahoma 74116

SUBJECT: TRANSFER OF CONTROL OF LICENSE NO. 35-27045-01, NOTICE OF
VIOLATION, AND LICENSE AMENDMENT

This is in response to letters dated September 19, and October 20, 1997, wherein NRC was informed of the transfer of control of License No. 35-27045-01 effective January 3, 1996.

Our review of the above documents indicates that the transfer of license control described above is in accordance with the Atomic Energy Act of 1954 (68 Stat. 919), including any amendments thereto, and we hereby give NRC's consent to same pursuant to 10 CFR 30.34(b). However, the transfer of license control should not have taken place until the NRC had given its written consent, as required by 10 CFR 30.34(b).

You are not required to respond to this letter unless the description therein does not accurately reflect your position. In that case, or if you choose to provide additional information, you should follow the instructions specified in the enclosed Notice of Violation.

In accordance with 10 CFR 2.790 of the NRC's "Rules of Practice," a copy of this letter, its enclosure, and your response will be placed in the NRC Public Document Room (PDR). To the extent possible, your response should not include any personal privacy, proprietary, or safeguards information so that it can be placed in the PDR without redaction.

Enclosed you will find Amendment No. 06 to License No. 35-27045-01. You should review this license carefully and be sure that you understand all conditions. If you have any questions regarding this matter, you may contact Vivian H. Campbell at 817-860-8143 or Charles L. Cain at 817-860-8186.

NRC expects licensees to conduct their programs with meticulous attention to detail and a high standard of compliance. Because of the serious consequences to employees and the public which can result from failure to comply with NRC requirements, you must conduct your program involving radioactive materials in accordance with the conditions of your NRC license, representations made in your license application, and NRC regulations. In particular, note that you must:

1. Operate in accordance with NRC regulations 10 CFR Part 19, "Notices, Instructions and Reports to Workers: Inspection and Investigations," 10 CFR Part 20, "Standards for Protection Against Radiation," and other applicable regulations.

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2. Possess radioactive material only in the quantity and form indicated in your license.
3. Use radioactive material only for the purpose(s) indicated in your license.
4. Notify NRC in writing of any change in mailing address (no fee required if the location of radioactive material remains the same).
5. Request and obtain written NRC consent before transferring your license or any right thereunder, either voluntarily or involuntarily, directly or indirectly, through transfer of control of your license to any person or entity. A transfer of control of your license includes not only a total change of ownership, but also a change in the controlling interest in your company whether it is a corporation, partnership, or other entity. In addition, appropriate license amendments must be requested and obtained for any other planned changes in your facility or program that are contrary to your license or contrary to representations made in your license application, as well as supplemental correspondence thereto, which are incorporated into your license. A license fee may be charged for the amendments if you are not in a fee-exempt category.
6. Maintain in a single document decommissioning records that have been certified for completeness and accuracy listing all the following items applicable to the license:
 - Onsite areas designated or formerly designated as restricted areas as defined in 10 CFR 20.3(a)(14) or 20.1003.
 - Onsite areas, other than restricted areas, where radioactive materials in quantities greater than amounts listed in Appendix C to 10 CFR 20.1001-20.2401 have been used, possessed, or stored.
 - Onsite areas, other than restricted areas, where spills or other unusual occurrences involving the spread of contamination in and around the facility, equipment, or site have occurred that required reporting pursuant to 10 CFR 30.50(b)(1) or (c)(4), including areas where subsequent cleanup procedures have removed the contamination.
 - Specific locations and radionuclide contents of previous and current burial areas within the site, excluding radioactive material with half-lives of 10 days or less, depleted uranium used only for shielding or as penetrators in unused munitions, or sealed sources authorized for use at temporary job sites.
 - Location and description of all contaminated equipment involved in licensed operations that is to remain onsite after license termination.

7. Submit a complete renewal application with proper fee, or termination request at least 30 days before the expiration date on your license. You will receive a reminder notice approximately 90 days before the expiration date. Possession of radioactive material after your license expires is a violation of NRC regulations.
8. Request termination of your license if you plan to permanently discontinue activities involving radioactive material.

You will be periodically inspected by NRC. Failure to conduct your program in accordance with NRC regulations, license conditions, and representations made in your license application and supplemental correspondence with NRC will result in enforcement action against you. This could include issuance of a notice of violation; imposition of a civil penalty; or an order suspending, modifying, or revoking your license as specified in the "General Statement of Policy and Procedure for NRC Enforcement Actions" (Enforcement Policy), 60 FR 34381, June 30, 1995.

Thank you for your cooperation.

Sincerely,



Ross A. Scarano, Director
Division of Nuclear Materials Safety

Docket: 030-31876
License: 35-27045-01
Control: 466528

Enclosures:

- 1) Notice of Violation
- 2) Amendment No. 06 to License No. 35-27045-01

bcc to DCD (IE-07)

bcc with enclosure:

EWMerschhoff

JEDyer

RAScarano

LLHowell

CLCain

DBSpitzberg

FAWenslawski

*VHCampbell

*NMLB

*MIS System

*RIV Nuclear Materials File - 5th Floor

*W/IFS Form

DOCUMENT NAME: G:\NMLS.O\VHC\LAU.MLC

To receive copy of document, indicate in box: "C" = Copy without enclosures "E" = Copy with enclosures "N" = No copy

RIV:NMLB		C:NMLB		DD:DNMS		D:DNMS	
VHCampbell	<i>W</i>	CLCain	<i>He</i>	LLHowell		RAScarano	
11/21/97		11/24/97		1/97		11/24/97	

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