

(01-2020)  
10 CFR 30, 32,  
33, 34, 35, 36,  
37, 39, and 40



**APPLICATION FOR MATERIALS LICENSE**

Estimated burden per response to comply with this mandatory collection request: 4.3 hours. Submittal of the application is necessary to determine that the applicant is qualified and that adequate procedures exist to protect the public health and safety. Send comments regarding burden estimate to the Information Services Branch (T-6 A10M), U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001, or by e-mail to [Infocollects.Resource@nrc.gov](mailto:Infocollects.Resource@nrc.gov), and to the Desk Officer, Office of Information and Regulatory Affairs, NEOB-10202, (3150-0120), Office of Management and Budget, Washington, DC 20503. If a means used to impose an information collection does not display a currently valid OMB control number, the NRC may not conduct or sponsor, and a person is not required to respond to, the information collection.

INSTRUCTIONS: SEE THE CURRENT VOLUMES OF THE NUREG-1556 TECHNICAL REPORT SERIES ("CONSOLIDATED GUIDANCE ABOUT MATERIALS LICENSES") FOR DETAILED INSTRUCTIONS FOR COMPLETING THIS FORM: <http://www.nrc.gov/reading-rm/doc-collections/nuregs/staff/sr1556/>. SEND TWO COPIES OF THE COMPLETED APPLICATION TO THE NRC OFFICE SPECIFIED BELOW.

APPLICATION FOR DISTRIBUTION OF EXEMPT PRODUCTS FILE APPLICATIONS WITH:

MATERIALS SAFETY LICENSING BRANCH  
DIVISION OF MATERIAL SAFETY, STATE, TRIBAL AND RULEMAKING PROGRAMS  
OFFICE OF NUCLEAR MATERIALS SAFETY AND SAFEGUARDS  
U.S. NUCLEAR REGULATORY COMMISSION  
WASHINGTON, DC 20555-0001

ALL OTHER PERSONS FILE APPLICATIONS AS FOLLOWS:

IF YOU ARE LOCATED IN:

ALABAMA, CONNECTICUT, DELAWARE, DISTRICT OF COLUMBIA, FLORIDA,  
GEORGIA, KENTUCKY, MAINE, MARYLAND, MASSACHUSETTS, NEW HAMPSHIRE,  
NEW JERSEY, NEW YORK, NORTH CAROLINA, PENNSYLVANIA, PUERTO RICO,  
RHODE ISLAND, SOUTH CAROLINA, TENNESSEE, VERMONT, VIRGINIA, VIRGIN  
ISLANDS, OR WEST VIRGINIA,

SEND APPLICATIONS TO:

LICENSING ASSISTANCE TEAM  
DIVISION OF NUCLEAR MATERIALS SAFETY  
U.S. NUCLEAR REGULATORY COMMISSION, REGION I  
2100 RENAISSANCE BOULEVARD, SUITE 100  
KING OF PRUSSIA, PA 19406-2713

**RECEIVED  
08/18/2020**

IF YOU ARE LOCATED IN:

**Mail Control Number: 622886**

ILLINOIS, INDIANA, IOWA, MICHIGAN, MINNESOTA, MISSOURI, OHIO, OR WISCONSIN, SEND APPLICATIONS TO:

MATERIALS LICENSING BRANCH  
U.S. NUCLEAR REGULATORY COMMISSION, REGION III  
2443 WARRENVILLE ROAD, SUITE 100  
LISLE, IL 60532-4352

**Docket Number : 3039167  
License Number : 49-35541-01**

IF YOU ARE LOCATED IN:

ALASKA, ARIZONA, ARKANSAS, CALIFORNIA, COLORADO, CONNECTICUT, DELAWARE, FLORIDA,  
LOUISIANA, MISSISSIPPI, MONTANA, NEBRASKA, NEVADA, NEW MEXICO, NORTH  
DAKOTA, OKLAHOMA, OREGON, PACIFIC TRUST TERRITORIES, SOUTH DAKOTA, TEXAS,  
UTAH, WASHINGTON, OR WYOMING,

**Licensee Name : Element  
Technical Services, LLC**

SEND APPLICATIONS TO:

NUCLEAR MATERIALS LICENSING BRANCH  
U.S. NUCLEAR REGULATORY COMMISSION, REGION IV  
1600 E. LAMAR BOULEVARD  
ARLINGTON, TX 76011-4511

PERSONS LOCATED IN AGREEMENT STATES SEND APPLICATIONS TO THE U.S. NUCLEAR REGULATORY COMMISSION ONLY IF THEY WISH TO POSSESS AND USE LICENSED MATERIAL IN STATES SUBJECT TO U.S. NUCLEAR REGULATORY COMMISSION JURISDICTIONS.

<p>1. THIS IS AN APPLICATION FOR (Check appropriate item)</p> <p><input type="checkbox"/> A. NEW LICENSE</p> <p><input checked="" type="checkbox"/> B. AMENDMENT TO LICENSE NUMBER <u>49-35541-01</u></p> <p><input type="checkbox"/> C. RENEWAL OF LICENSE NUMBER _____</p>	<p>2. NAME AND MAILING ADDRESS OF APPLICANT (Include zip code)</p> <p>Element Technical Services, LLC 675 N. Hereford Ln. Casper, WY 82609</p>
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<p>3. ADDRESS WHERE LICENSED MATERIALS WILL BE USED OR POSSESSED</p> <p>675 N. Hereford Ln. Casper, WY 82609</p>	<p>4. NAME OF PERSON TO BE CONTACTED ABOUT THIS APPLICATION</p> <p>Travis Wyatt</p> <table border="1"> <tr> <td>BUSINESS TELEPHONE NUMBER (307) 439-0026</td> <td>BUSINESS CELLULAR TELEPHONE NUMBER (307) 262-3902</td> </tr> <tr> <td colspan="2">BUSINESS E-MAIL ADDRESS Twyatt@element-technical.com</td> </tr> </table>	BUSINESS TELEPHONE NUMBER (307) 439-0026	BUSINESS CELLULAR TELEPHONE NUMBER (307) 262-3902	BUSINESS E-MAIL ADDRESS Twyatt@element-technical.com	
BUSINESS TELEPHONE NUMBER (307) 439-0026	BUSINESS CELLULAR TELEPHONE NUMBER (307) 262-3902				
BUSINESS E-MAIL ADDRESS Twyatt@element-technical.com					

SUBMIT ITEMS 5 THROUGH 11 ON 8-1/2 X 11" PAPER. THE TYPE AND SCOPE OF INFORMATION TO BE PROVIDED IS DESCRIBED IN THE LICENSE APPLICATION GUIDE.

<p>5. RADIOACTIVE MATERIAL</p> <p>a. Element and mass number; b. chemical and/or physical form; and c. maximum amount which will be possessed at any one time.</p>	<p>6. PURPOSE(S) FOR WHICH LICENSED MATERIAL WILL BE USED.</p>				
<p>8. TRAINING FOR INDIVIDUALS WORKING IN OR FREQUENTING RESTRICTED AREAS.</p>	<p>7. INDIVIDUAL(S) RESPONSIBLE FOR RADIATION SAFETY PROGRAM AND THEIR TRAINING AND EXPERIENCE.</p>				
<p>10. RADIATION SAFETY PROGRAM.</p>	<p>9. FACILITIES AND EQUIPMENT.</p>				
<p>12. LICENSE FEES (Fees required only for new applications, with few exceptions*) (See 10 CFR 170 and Section 170.31) *Amendments/Renewals that increase the scope of the existing license to a new or higher fee category will require a fee.</p> <table border="1"> <tr> <td>FEE CATEGORY</td> <td>AMOUNT ENCLOSED \$</td> </tr> <tr> <td></td> <td></td> </tr> </table>	FEE CATEGORY	AMOUNT ENCLOSED \$			<p>11. WASTE MANAGEMENT.</p>
FEE CATEGORY	AMOUNT ENCLOSED \$				

PER THE DEBT COLLECTION IMPROVEMENT ACT OF 1996 (PUBLIC LAW 104-134), YOU ARE REQUIRED TO PROVIDE YOUR TAXPAYER IDENTIFICATION NUMBER. PROVIDE THIS INFORMATION BY COMPLETING NRC FORM 531: <https://www.nrc.gov/reading-rm/doc-collections/forms/nrc531info.html>.

13. CERTIFICATION. (Must be completed by applicant) THE APPLICANT UNDERSTANDS THAT ALL STATEMENTS AND REPRESENTATIONS MADE IN THIS APPLICATION ARE BINDING UPON THE APPLICANT.

THE APPLICANT AND ANY OFFICIAL EXECUTING THIS CERTIFICATION ON BEHALF OF THE APPLICANT, NAMED IN ITEM 2, CERTIFY THAT THIS APPLICATION IS PREPARED IN CONFORMITY WITH TITLE 10, CODE OF FEDERAL REGULATIONS, PARTS 30, 32, 33, 34, 35, 36, 37, 39, AND 40, AND THAT ALL INFORMATION CONTAINED HEREIN IS TRUE AND CORRECT TO THE BEST OF THEIR KNOWLEDGE AND BELIEF.

WARNING: 18 U.S.C. SECTION 1001 ACT OF JUNE 25, 1948 62 STAT. 749 MAKES IT A CRIMINAL OFFENSE TO MAKE A WILLFULLY FALSE STATEMENT OR REPRESENTATION TO ANY DEPARTMENT OR AGENCY OF THE UNITED STATES AS TO ANY MATTER WITHIN ITS JURISDICTION.

<p>CERTIFYING OFFICER -- TYPED/PRINTED NAME AND TITLE</p> <p>Travis Wyatt - District RSO</p>	<p>SIGNATURE</p>	<p>DATE</p> <p>6-25-2020</p>
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FOR NRC USE ONLY					
TYPE OF FEE	FEE LOG	FEE CATEGORY	AMOUNT RECEIVED	CHECK NUMBER	COMMENTS
			\$		
APPROVED BY				DATE	

Ms. Carol Hill

U.S. Nuclear Regulatory Commission, Region-IV  
1600 East Lamar Boulevard  
Arlington, TX 76011-4511

Subject: License Amendment Request to Perform Non-Routine Maintenance

Dear Ms. Hill:

I am writing to formally request that Element Technical Services LLC. receives an amendment to our radiation license in order to perform non-routine maintenance. It is Element's goal to be able to remove and re-install the piece of iron pipe (pup joint) that the gauge is mounted to in order to have the iron re-certified or changed out. The iron certification is something that is done at least annually. The re-certification can also be done in certain circumstances where there is a possibility that the integrity of the iron has been compromised. In order to perform this task now, we would have to find a vendor that not only does iron certification, but is also certified/licensed to perform non-routine maintenance on nuclear gauges. We believe that finding vendors that are capable of performing this task will be difficult. In addition, we also believe that there will be an added risk to transporting these gauges to a facility capable and certified to do so.

We are fully aware of the potential hazards in performing this task and will thus have measures in place in order to accomplish the task. The basic procedure is attached. Maintenance will be performed by authorized and trained workers.

Sincerely,

Travis Wyatt  
Radiation Safety Officer  
Element Technical Services

## Removal of Shutterless Radiation Devices from PUP Joints

Removal of radiation devices from a pup joint or from a blender is considered to be non-routine maintenance. Approval must be granted by the RSO prior to performing the task and the proper procedures must be followed. The following procedure is to be used for the removal of radiation devices that are currently being used by Element Technical Services:

- Thermo Fisher Scientific (TN Tech) 5192 (Shutterless)

**Removal of a source holder from a “pup” pipe shall only be performed by trained Authorized Workers or qualified servicing contractors with a U.S. NRC servicing licence. When handling shutterless radiation device source holders it is imperative that the Authorized Worker or Servicing Contractor always be aware of the primary beam location and direction.**

The following procedures shall be followed:

- a. Gain approval by local RSO and management prior to performing any non-routine maintenance
- b. Place a barrier around the radiation device to control access to the radiation device removal work area. Barrier should keep other individuals at least 15 feet away from the task being performed.
- c. Confirm that there is a valid leak test sample analysis certificate for the source holder to be removed.
- d. Examine the source holder for any visible damage, if there is any evidence of damage notify the RSO immediately and follow instruction in **Section 14.0 Emergency Procedures**.
- e. Before separation of the source holder from the “pup” pipe, confirm the radiation intensities on contact and at 1 foot from the source holder are consistent with the measurements recorded during the previous installation of the source holder to a “pup” pipe. Inform the RSO if the radiation intensity is in excess of 20 percent (>20%) of the previous recorded radiation intensity measurements.
- f. Separate the source holder and detector assembly from the “pup” pipe to be replaced.
- g. With the primary beam pointing in a vertical direction place a 2x4x8 inch lead brick over the primary beam source aperture.
- h. Separate the “pup” pipe to be replaced from the detector assembly.
- i. Remove the lead brick from the source holder and align the new “pup” pipe with the source holder bracket.
- j. Remount the detector assembly and attached to the source holder mounting bracket with four (4) 7/16 inch bolts.
- k. If the source holder is being removed for detector maintenance purposes. The source holder is to be transferred to the radiation device storage area until the maintenance procedure is complete. Radiation device source holders are not to be left unattended for any reason.
- l. Amend the radiation device inventory record to show the storage location of the source holder.
- m. Following attachment of the source holder to the detector “pup” pipe assembly, record the radiation intensity on contact with and at thirty (30) centimeters from the exterior of the

source holder. Take at least four (4) measurements from two (2) perpendicular planes around the source holder. Record the radiation intensity values for future reference.

- n. Record the make and model of radiation survey meter used and the radiation intensity measured.



**ACKNOWLEDGEMENT - RECEIPT OF CORRESPONDENCE**

**Name and Address of Applicant and/or Licensee**

Mr. Travis Wyatt, Radiation Safety Officer  
Element Technical Services, LLC  
675 Hereford Lane  
Casper, Wyoming 82609

**Date**

08/31/2020

**License Number(s)**

49-35541-01

**Mail Control Number(s)**

622886

**Licensing and/or Technical Reviewer or Branch**

C. Hill

This is to acknowledge receipt of your:  Letter and/or  Application Dated: 06/25/2020

The initial processing, which included an administrative review, has been performed.

Amendment  Termination  New License  Renewal

There were no administrative omissions identified during our initial review.

This is to acknowledge receipt of your application for renewal of the material(s) license identified above. Your application is deemed timely filed, and accordingly, the license will not expire until final action has been taken by this office.

Your application for a new NRC license did not include your taxpayer identification number. Please complete and submit NRC Form 531, Request for Taxpayer Identification Number, located at the following link: <http://www.nrc.gov/reading-rm/doc-collections/forms/nrc531.pdf>  
Follow the instructions on the form for submission.

The following administrative omissions have been identified:

Your application has been assigned the above listed MAIL CONTROL NUMBER. When calling to inquire about this action, please refer to this control number. Your application has been forwarded to a technical reviewer. Please note that the technical review, which is normally completed within 180 days for a renewal application (90 days for all other requests), may identify additional omissions or require additional information. If you have any questions concerning the processing of your application, our contact information is listed below:

**Region IV  
U. S. Nuclear Regulatory Commission  
DNMS/NMSB - B  
1600 E. Lamar Boulevard  
Arlington, TX 76011-4511  
(817) 200-1103 or (817) 200-1140**



Agency: NRC

WBL WORKSHEET

DOCKET NUMBER: 3039167 LICENSE NUMBER: 49-35541-01 STATUS: Pending Amendment

MAIL CONTROL NUMBER: 622886 RECEIPT DATE: 08/31/2020 ACTION TYPE: Amendment

DUE DATE: 11/29/2020 INST. CODE: 35541 LICENSE REGION: Region 4

LICENSE TYPE: 30 ENTITY TYPE: C LICENSE GROUP: Industrial

ISSUE DATE: ORIGINAL DATE: 06/24/2019 EXPIRATION DATE: 06/30/2034

DECOMMISSIONING CATEGORY: Group 1 LAST ISSUE DATE:

LICENSEE NAME: Element Technical Services, LLC DECOM FIN ASSUR REQD: N  
SUBM: N

MAILING ADDRESS LINE1: 675 Hereford Lane CONT PLAN REQD: N APPRV: N

MAILING ADDRESS LINE 2:

CITY: Casper STATE: WY ZIP: 82609

CONTACT PERSON: PREFIX: FIRST NAME: Brendan MIDDLE INITIAL:

LAST NAME: Nelson SUFFIX:

JOB TITLE: Director and CFO PHONE: 306-453-1414 FAX: EMAIL:

BILLING ADDRESS LINE 1:

BILLING ADDRESS LINE 2:

CITY: STATE: Wyoming ZIP:

BILLING CONTACT PERSON: FIRST NAME: MIDDLE INITIAL: LAST NAME:

PHONE: EMAIL: FAX:

PRIMARY PGM CODE: 03120 SECONDARY PGM CODE:

INSPECTION REGION: Region 4 PRIORITY: 5

RSO: PREFIX: FIRST NAME: Travis MIDDLE INITIAL: LAST NAME Wyatt

SUFFIX: RSO JOB TITLE: RSO

RSO PHONE: 306-453-1414 RSO FAX: RSO EMAIL:

STATES WHERE USE IS AUTHORIZED: 0- ALL LISTED STATES  
1- SAME AS STATE IN ADDRESS  
2- ALL STATES  
3- NON-AGREEMENT-STATES

AUTHORIZED STATES (USE ONLY IF ABOVE IS ZERO):