

COAL MAC, LLC

P. O. Box 1050 Holden, WV 25625 304/792-8400 (fax 304/792-8401)

January 4, 2023

Attn: Betsy Ullrich Mail Control No. 632250 USNRC, Region 1 Division of Radiological Safety and Security 475 Allendale Road – Suite 102 King of Prussia, PA 19406

Re:

Coal Mac, LLC

Renewal of Materials License No. 47-25599-01

Dear Ms. Ullrich:

Please find enclosed our revised Application for Renewal of Coal-Mac LLC Materials License No. 47-25599-01 for our coal preparation and loading facilities located in Logan and Mingo Counties of West Virginia. The revised application addresses the modifications/additions suggested in your correspondence dated December 22, 2022.

Should you have any questions, or need additional information, please contact me at the phone numbers or email listed below.

Sincerely,

Timothy H. Evans Project Manager

304-792-8443 (office) 304-687-8237 (cell)

tim.evans@jmpholdingsllc.com



UNITED STATES NUCLEAR REGULATORY COMMISSION

REGION I 475 ALLENDALE ROAD – SUITE 102 KING OF PRUSSIA, PA 19406-1415

December 22, 2022

Timothy H. Evans, Project Manager Coal-Mac, LLC P. O. box 1050 22 Mine Road Holden, WB 25625

SUBJECT: COAL-MAC, LLC, REQUEST FOR ADDITIONAL INFORMATION, MAIL

CONTROL NO. 632250

Dear Mr. Evans:

This is in reference to your letter dated July 26, 2022, requesting to renew NRC License No. 47-25599-01. In order to continue our review, we need the following additional information:

- 1. In accordance with NUREG-1556, Volume 4, Revision 1 "Program-Specific Guidance About Fixed Gauge Licenses." (NUREG-1556, Vol. 4, Rev. 1) Section 8.7.2, "Authorized Users," state "Before using licensed materials, authorized users will have successfully completed one of the training courses described in the "Criteria" part of the section titled "Authorized Users" in NUREG-1556, Vol. 4, Rev. 1."
- 2. In accordance with NUREG-1556, Vol. 4, Rev. 1, Section 8.10.2, "Radiation Monitoring Instruments," state "Surveys according to 10 CFR 20.1501 will be performed by a person specifically authorized by the NRC or an Agreement State to perform these surveys." Or you may submit one of the alternate means of performing surveys described in Section 8.10.2.
- 3. In accordance with NUERG -1556, Vol. 4, Rev. 1, Section 8.10.3, "Material Receipt and Accountability," state "Physical inventories will be conducted every 6 months or at other intervals approved by the NRC to account for all sealed sources and devices received and possessed under the license."
- 4. In accordance with NUREG-1556, Vol. 4, Rev. 1, Section 8.10.4, "Occupational Dose" state either that
 - a. "We will maintain, for inspection by the NRC, documentation demonstrating that unmonitored individuals are not likely to receive a radiation dose in excess of the limits in 10 CFR 20.1502(a);

OR state

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

- 5. In accordance with NUREG-1556, Col. 4, Rev. 1, Section 8.10.6, "Operating, Emergency, and Security Procedures," provide ONE of the following:
 - a. If the gauges meet one or more fo the safety conditions specific in the "Discussion" portion of this section, state "Operating, emergency and security procedures will be developed, implemented, maintained and distributed and will meet the criteria in Section 8.10.6 of NUREG-156, Vol. 4, Rev. a."; OR
 - b. If the gauges do not meet any of the safety conditions specified in the "Discussion" portion of Section 8.10.6, provide you operating, emergency, security, and lock-out procedures.
- 6. In accordance with NUREG-1556 Vol. 4, Rev. 1, Section 8.10.7, "Leak Tests," state "Leak tests will be performed at intervals approved by the NRC or an Agreements Statie and specified in the Sealed Source and Device registration certificate. Leak tests will be performed by an organization licensed by the NRC or an Agreement State to provide leak testing services to other licensees; or by using a leak test sample collection kit supplied by an organization licensed by the NRC or an Agreement State to provide leak test kids and/or sample analysis services to other licensees and according to the kit supplier's instructions. Records of leak test results will be maintained." Alternately, provide one of the other means of performing leak tests as stated in Section 8.10.7.
- 7. In accordance with NUREG-1556, Vol. 4, Rev. 1, Section 8.10.8, "Maintenance,"
 - a. For routine maintenance, either state "We will implement and maintain procedures for routine maintenance of our gauges according to each manufacture's or distributor's written recommendations and instructions." Or provide alternate procedures for NRC review. AND
 - b. For non-routine operations, either state "The gauge manufacturer, distributor, or other person licensed by the NRC or an Agreement State will perform nonroutine opeations such as installation, initial radiation survey, repair and maintenance of radiological safety components, relocation, replacement, alignment, removal from services, and disposal of sealed sources." OR request the work that you wish to perform and use the information in Appendix J to support the request.

We will continue our review upon receipt of this information. A pdf of an originally signed letter may be provided attached to an email sent to Elizabeth.Ullrich@nrc.gov. Alternately, a hard copy response may be provided by regular mail to:

Attn: Betsy Ullrich Mail Control No. 632250 USNRC, Region I Division of Radiological Safety and Security 475 Allendale Road – Suite 102 King of Prussia, PA 19406 T. Evans 3

In order to continue prompt review of your application, we request that you submit your response to this letter within 30 calendar days from the date of this letter.

An electronic version of the NRC's regulations is available on the NRC Web Site at: www.nrc.gov. Additional information regarding use of radioactive materials may be obtained on the NRC Web Site at: http://www.nrc.gov/materials/miau/mat-toolkits.html. This site also provides the link to the toolbox for updated information on the revised regulations for naturally-occurring and accelerator-produced radioactive materials (NARM).

In accordance with 10 CFR 2.390 of the NRC's "Agency Rules of Practice and Procedure," a copy of this letter will be available electronically for public inspection in the NRC Public Document Room or from the NRC's document system (ADAMS). ADAMS is accessible from the NRC Web Site at: http://www.nrc.gov/reading-rm/adams.html. Please be aware that you may request that certain portions of your submittal to NRC be withheld form public disclosure as proprietary information. To do this, you must execute an affidavit as specified in 10 CFR 2.390. You must list all portions that you wish to be held proprietary, along with your reasoning as to why that is appropriate. While it is allowable, please refrain from submitting proprietary information in support of a license unless necessary. Keep in mind that all NRC licenses are considered to be in the public domain, and therefore may be viewed by any member of the public who requests to see them.

If you have any questions regarding this request for additional information, please contact me at 240-704-4575 or by electronic mail to Elizabeth.Ullrich@nrc.gov.

Thank you for your cooperation.

Sincerely,

Betsy Ullrich, Senior Health Physicist Commercial, Industrial, R&D and Academic Branch Division of Radiological Safety and Security Region I

License No. 47-25599-01 Docket No. 030-36047 Mail Control No. 632250

cc: Doug Boyd, Radiation Safety Officer

T. Evans 4

COAL-MAC, LLC, REQUEST FOR ADDITIONAL INFORMATION, MAIL CONTROL NO. 632250 DATED DECEMBER 28, 2022

DOCUMENT NAME: [\nrc.gov\nrc\R1\Office\DNMS\WBL Documents\WBL License RAI\L47-25599-

01.632250..docx

SUNSI Review Complete: Betsy Ullrich

After declaring this document "An Official Agency Record" it <u>will</u> be released to the Public.

To receive a copy of this document, indicate in the box: "C" = Copy w/o attach/encl "E" = Copy w/ attach/encl "N" = No copy

OFFICE	RI:DRSS	N			
NAME	Betsy Ullrich				
DATE	12/28/22 exu				



COAL MAC, LLC

P. O. Box 1050 Holden, WV 25625 304/792-8400 (fax 304/792-8401)

July 26, 2022

Licensing Assistance Team
Division of Nuclear Materials Safety
U.S. Nuclear Regulatory Commission, Region 1
2100 Renaissance Boulevard, Suite 100
King of Prussia, PA 19406-2713

Re:

Coal Mac, LLC

Renewal of Materials License No. 47-25599-01

Dear Sir or Madam:

Please find enclosed our Application for Renewal of Coal-Mac LLC Materials License No. 47-25599-01 for our coal preparation and loading facilities located in Logan and Mingo Counties of West Virginia.

Should you have any questions, or need additional information, please contact me at the phone numbers or email listed below.

Sincerely,

Timothy H. Evans Project Manager

304-792-8443 (office)

304-687-8237 (cell)

tim.evans@jmpholdingsllc.com



UNITED STATES NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

July 1, 2022

ATTN: Radiation Safety Officer Coal-Mac, LLC Harless Industrial Park 22 Mine Road Holden, WV 25625

Re: License No. 47-25599-01

SUBJECT: NOTICE OF LICENSE EXPIRATION

Your U.S. Nuclear Regulatory Commission (NRC) license will expire within the next 2 months. If you wish to continue your licensed program, you should prepare and submit a renewal application on NRC Form 313, "Application for Materials License" (enclosed), following regulations in Title 10 of the Code of Federal Regulations (10 CFR) and licensing guidance NUREG 1556, "Consolidated Guidance About Materials Licenses."

You must submit an application for the renewal of your license at least 30 days before the expiration date on the license.

If you do not wish to renew your license, you must dispose of or transfer all licensed radioactive material in your possession in accordance with 10 CFR Parts 30, 40 and 70. Then complete the enclosed NRC Form 314, "A Certificate of Disposition of Materials" and return it before the expiration date of your license, with a request that your license be terminated. If you have already applied for timely renewal of your materials license, please disregard this letter."

Sincerely,

/RA/

Materials Safety and Tribal Liaison Branch Division of Material Safety, Security, State, and Tribal Program Office of Nuclear Material Safety and Safeguards

Enclosures:

- 1. NRC Form 313
- 2. NRC Form 314

NRC FORM 313

U.S. NUCLEAR REGULATORY COMMISSION

(10-2017) 10 CFR 30, 32, 33, 34, 35, 36, 37 39 and 40



APPLICATION FOR MATERIALS LICENSE

APPROVED BY OMB: NO. 3150-0120

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-2 F43). U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001, or by e-mail to 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.

EXPIRES: 06/30/2019

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.nrs.gov/reading-mr/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: IF YOU ARE LOCATED IN: MATERIALS SAFETY LICENSING BRANCH ILLINOIS, INDIANA, IOWA, MICHIGAN, MINNESOTA, MISSOURI, OHIO, OR WISCONSIN, SEND MATERIALS SAFETT LICENSING BRANCH DIVISION OF MATERIAL SAFETY, STATE, TRIBAL AND RULEMAKING PROGRAMS OFFICE OF NUCLEAR MATERIALS SAFETY AND SAFEGUARDS APPLICATIONS TO: U.S. NUCLEAR REGULATORY COMMISSION MATERIALS LICENSING BRANCH U.S. NUCLEAR REGULATORY COMMISSION, REGION III 2443 WARRENVILLE ROAD, SUITE 210 WASHINGTON, DC 20555-0001 ALL OTHER PERSONS FILE APPLICATIONS AS FOLLOWS: LISLE, IL 60532-4352 IF YOU ARE LOCATED IN: IF YOU ARE LOCATED IN: ALABAMA, CONNECTICUT, DELAWARE, DISTRICT OF COLUMBIA, FLORIDA, ALASKA, ARIZONA, ARKANSAS, CALIFORNIA, COLORADO, HAWAII, IDAHO, KANSAS, GEORGIA, KENTUCKY, MAINE, MARYLAND, MASSACHUSETTS, NEW HAMPSHIRE, NEW JERSEY, NEW YORK, NORTH CAROLINA, PENNSYLVANIA, PUERTO RICO, LOUISIANA, MISSISSIPPI, MONTANA, NEBRASKA, NEVADA, NEW MEXICO, NORTH DAKOTA, OKLAHOMA, OREGON, PACIFIC TRUST TERRITORIES, SOUTH DAKOTA, TEXAS, RHODE ISLAND, SOUTH CAROLINA, TENNESSEE, VERMONT, VIRGINIA, VIRGIN UTAH, WASHINGTON, OR WYOMING, ISLANDS, OR WEST VIRGINIA, SEND APPLICATIONS TO: SEND APPLICATIONS TO: LICENSING ASSISTANCE TEAM NUCLEAR MATERIALS LICENSING BRANCH DIVISION OF NUCLEAR MATERIALS SAFETY U.S. NUCLEAR REGULATORY COMMISSION, REGION IV U.S. NUCLEAR REGULATORY COMMISSION, REGION I 1600 E. LAMAR BOULEVARD 2100 RENAISSANCE BOULEVARD, SUITE 100 ARLINGTON, TX 76011-4511 KING OF PRUSSIA, PA 19406-2713 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. THIS IS AN APPLICATION FOR (Check appropriate item) 2. NAME AND MAILING ADDRESS OF APPLICANT (Include zip code) Coal-Mac LLC A NEW LICENSE P.O. Box 1050, 22 Mine Road B. AMENDMENT TO LICENSE NUMBER Holden, WV 25625 47-25599-01 C. RENEWAL OF LICENSE NUMBER 4. NAME OF PERSON TO BE CONTACTED ABOUT THIS APPLICATION ADDRESS WHERE LICENSED MATERIALS WILL BE USED OR POSSESSED Ragland Loadout Facility Doug Boyd 16 Duty Branch Road Delbarton, WV 25670 BUSINESS TELEPHONE NUMBER BUSINESS CELLULAR TELEPHONE NUMBER 606-424-6121 304-792-8400 Holder ZZ Plant Pine Cleek Road **BUSINESS E-MAIL ADDRESS** doug. boyd @ jmpholdings Ilc. com Omar, wv 25638 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 6. PURPOSE(S) FOR WHICH LICENSED MATERIAL WILL BE USED. 5 RADIOACTIVE MATERIAL INDIVIDUAL(S) RESPONSIBLE FOR RADIATION SAFETY PROGRAM AND THEIR TRAINING AND a. Element and mass number, b. chemical and/or physical form; and c. maximum amount EXPERIENCE which will be possessed at any one time. 8. TRAINING FOR INDIVIDUALS WORKING IN OR FREQUENTING RESTRICTED AREAS 10. RADIATION SAFETY HIS SRAM 9. FACILITIES AND EQUIPMENT 11. WASTE MANAGEMENT. 12. LICENSE FEES (Fees required only for new applications, with few exceptions*) AMOUNT ENCLOSED \$ (See 10 CFR 170 and Section 170.31) CATEGORY *Amendments/Renewals that increase the scope of the existing license to a new or higher fee category will require a fee. 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 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. CERTIFYING OFFICER - TYPED/PRINTED NAME AND TITLE Boyd - R50 1009 FOR NRC USE ONLY AMOUNT RECEIVED CHECK NUMBER COMMENTS FEE LOG FEE CATEGORY TYPE OF FEE APPROVED BY DATE

5. RADIOACTIVE MATERIAL

a. Element & Mass number	b. chemical and/or physical form	c. maximum amount which will
		be possessed at any one time.
Cesium 137	A. Sealed Sources	800 millicuries total. No single
	(QSA/Amersham Models CDC.704,	source to exceed the maximum
	CDC.705, CDC.806, CDC.P4, CDC.93	activity specified in the
	CDC.ZT1; Isotope Products	certificate of registration issued
	Laboratories Models 225, Cs7.PO2,	by the U.S Nuclear Regulatory
	CsPO4-A;	Commission or an Agreement
	Berthold Technologies SSC Series;	State
	Thermo Fisher Models 696894 and	
	57157C)	
Californium 252	B. Sealed Sources	115 millicuries total. No single
	QSA/Amersham Models	source to exceed the maximum
	CDC .700 Series, CVN.Cyn Series,	activity specified in the
	CVN.CY6, CDC.CY7, CVN.CY8,	certificate of registration issued
	CVN.CY14, CVN.CY15, CVN.CY16,	by the U.S Nuclear Regulatory
	CVN.CY17; Frontier Technology	Commission or an Agreement
	Corp. Model 100 Series; FSUE Model	State
	HK252M41 Series; GE Hitachi Model	
	GEN-Cf-100 Series; Isotope Product	
	Laboratories Models 3004, 3014,	
	and N-252 Series)	

Items 5 and 6: Materials To Be Possessed and Proposed Uses

Yes	No	Radionuclide	Manufacturer or Distributor Model No.	Quantity	Use as Listed on SSD Registration Certificate	Specify Other Uses Not Listed on SSD Registration Certificate
		Isotope (Specify):	Device manufacturer (or distributor) and model number: Density Pro +	Specify activity per source and number of gauges requested.	Yes B Specific description of the gauge use: analyze Cog Perse	Not applicable Uses are: (Submit safety analysis supporting safe use)
			5201 Seriel # B5239		(5)0114)	
		Isotope (Specify):	Device manufacturer (or distributor) and model number:	Specify activity per source and number of gauges requested.	Yes specific description of the gauge use:	✓ Not applicable ☐ Uses are: (Submit safety analysis
		Cs-137	Density Pro+ 5201 Serial # B4777		Coal Refose (slurry)	supporting safe use)
		Isotope (Specify):	Device manufacturer (or distributor) and model number:	Specify activity per source and number of gauges requested.	Yes Specific description of the gauge use:	Not applicable Uses are: (Submit safety analysis
		Cs-137	Density Pro+ SZOI Serial # B4776	76.87 mCi	analize coal Refuse (slurry)	supporting safe use)
	Is financial assurance required? If yes, submit evidence of financial assurance.					

Items 5 and 6: Materials To Be Possessed and Proposed Uses

Yes	No	Radionuclide	Manufacturer or Distributor Model No.	Quantity	Use as Listed on SSD Registration Certificate	Specify Other Uses Not Listed on SSD Registration Certificate
		Isotope (Specify): Cs - 137	Device manufacturer (or distributor) and model number: Berthold LB 744¢D Sec:al # 0078/05	Specify activity per source and number of gauges requested.	Yes D Specific description of the gauge use: Avalize ash and moisture	☐ Uses are: (Submit safety analysis supporting safe use)
		Isotope (Specify): Cf-252	Device manufacturer (or distributor) and model number: ECA (CBX) CBX Serial # 3637NU	Specify activity per source and number of gauges requested.	Yes D Specific description of the gauge use: analize coal ash to moisture content	✓ Not applicable ☐ Uses are: (Submit safety analysis supporting safe use)
		Isotope (Specify): Cf- 252	Device manufacturer (or distributor) and model number: ECA (CBX) CBX Sec:al # FTC-CF-4327	Specify activity per source and number of gauges requested.	Yes A Specific description of the gauge use: analize Coal - 95h and moisture Coatent	Not applicable Uses are: (Submit safety analysis supporting safe use)
		Is financial assu	urance required? If	yes, submit eviden	ce of financial assur	ance.

Items 5 and 6: Materials To Be Possessed and Proposed Uses

Yes	No	Radionuclide	Manufacturer or Distributor Model No.	Quantity	Use as Listed on SSD Registration Certificate	Specify Other Uses Not Listed on SSD Registration Certificate
		Isotope (Specify): Cf -252	Device manufacturer (or distributor) and model number: ECA (CBX)	Specify activity per source and number of gauges requested. 0.47 mCi	Yes Sopecific description of the gauge use: Avalize Coal Ash and Moisture	✓ Not applicable ☐ Uses are: (Submit safety analysis supporting safe use)
			CBX Serial + FTC-CF-6851		content	
		Isotope (Specify):	Device manufacturer (or distributor) and model number:	Specify activity per source and number of gauges requested.	Yes Specific description of the gauge use:	Not applicable Uses are: (Submit safety
		Cf-252	ECA (CBX) CBX Sex; al # FTC-CF-23000	0.49 mCi	analize coal ash and moisture content	analysis supporting safe use)
		Isotope (Specify):	Device manufacturer (or distributor) and model number:	Specify activity per source and number of gauges requested.	Yes Some Specific description of the gauge use:	Not applicable Uses are: (Submit safety
		Cs-137	CQM (CB-HI) CB-HI Serial # V-953	6.13 mCi	analize Coal ash and moisture content	analysis supporting safe use)
		Is financial assu	rance required? If y	yes, submit eviden	ce of financial assura	ance.

Items 5 and 6: Materials To Be Possessed and Proposed Uses

Yes	No	Radionuclide	Manufacturer or Distributor Model No.	Quantity	Use as Listed on SSD Registration Certificate	Specify Other Uses Not Listed on SSD Registration Certificate
		Isotope (Specify):	Device manufacturer (or distributor) and model number: CQM (CB-HI) CB-HI Sec: al # FTC-CF-5118	Specify activity per source and number of gauges requested.	Yes Sopecific description of the gauge use: analize Coal ash and Moisture Content	Not applicable Uses are: (Submit safety analysis supporting safe use)
		Isotope (Specify):	Device manufacturer (or distributor) and model number: Cam (CB · HI) CB · HI Sec: al # FTC · CF · 7389	7	Yes Some Specific description of the gauge use:	Not applicable Uses are: (Submit safety analysis supporting safe use)
		Isotope (Specify):	Device manufacturer (or distributor) and model number: CQM(CB-HI) CB-HI Serial # FTC-CF-6140		Yes Specific description of the gauge use:	Not applicable Uses are: (Submit safety analysis supporting safe use)
		Is financial ass	urance required? If	yes, submit eviden	ce of financial assur	ance.

6. PURPOSE(S) FOR WHICH LICENSED MATERIAL WILL BE USED.

Coal analysis – measuring materials density, ash and moisture content.

7. INDIVIDUAL(S) RESPONSIBLE FOR RADIATION SAFETY PROGRAM

Doug Boyd - RSO - Coal-Mac LLC

See attached certification

8. TRAINING FOR INDIVIDUALS WORKING IN OR AROUND RESTRICTED AREAS

Coal-Mac's Safety Training Program and Annual Audits will be available for review during NRC inspections.

Before using licensed materials, authorized users will have successfully completed one of the training courses described in the "Criteria" part of the section titled "Authorized Users" in NUREG-1556, Vol. 4, Rev. 1.

9. FACILITIES AND EQUIPMENT

Coal-Mac LLC will ensure that the location of each fixed gauge meets the criteria in Section 8.9, "Facilities and Equipment," in NUREG-1556, Volume 4, Revision 1, "Consolidated Guidance About Materials Licenses: Program-Specific Guidance About Fixed Gauge Licenses."

10.1 RADIATION SAFETY PROGRAM

Coal-Mac LLC will conduct an annual review of the content and implementation of their radiation protection program.

A summary of these annual audits will be kept on file with the RSO for a minimum of three (3) years and will be available for review during NRC inspections.

10.2 RADIATION MONITORING INSTRUMENTS

Surveys according to 10 CFR 20.1501 will be performed by a person specifically authorized by the NRC to perform these surveys.

10.3 MATERIAL RECEIPT AND ACCOUNTABILITY

Physical inventories will be conducted every 6 months to account for all sealed sources and devices received and possessed under the license.

10.4 OCCUPATIONAL DOSE

Coal-Mac will maintain, for inspection by the NRC, documentation demonstrating that unmonitored individuals are not likely to receive a radiation dose in excess of the limits in 10 CFR 20.1502(a).

10.6 OPERATING, EMERGENCY, AND SECURITY PROCEDURES

"Operating, emergency and security procedures will be developed, implemented, maintained and distributed and will meet the criteria in Section 8.10.6 of NUREG-156, Vol. 4, Rev. a.

10.7 LEAK TESTS

Leak tests will be performed at intervals approved by the NRC and specified in the Sealed Source and Device registration certificate. Leak tests will be performed by an organization licensed by the NRC or an Agreement State to provide leak testing services to other licensees; or by using a leak test sample collection kit supplied by an organization licensed by the NRC or an Agreement State to provide leak test kits and/or sample analysis services to other licensees and according to the kit supplier's instructions. Records of leak test results will be maintained.

10.8 MAINTENANCE

Coal-Mac will implement and maintain procedures for routine maintenance of our gauges according to each manufacturer's or distributor's written recommendations and instructions.

11 WASTE MANAGEMENT

Any transfer, disposal or relocation of gauges will be conducted solely by an authorized third party specializing in radioactive materials handling.

