



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION I
475 ALLENDALE ROAD
KING OF PRUSSIA, PENNSYLVANIA 19406-1415

March 30, 2005

Docket No. 03020243
Control No. 136270

License No. 47-23076-01

David McCallister
Radiation Safety Officer
Huntington Testing & Technology, Inc.
1116 Rt. 52
Kenova, WV 25530

SUBJECT: HUNTINGTON TESTING & TECHNOLOGY, INC., REQUEST FOR
ADDITIONAL INFORMATION CONCERNING APPLICATION FOR
AMENDMENT TO LICENSE, CONTROL NO. 136270

Dear Mr. McCallister:

This is in reference to your letter dated March 14, 2005 requesting to amend Nuclear Regulatory Commission License No. 47-23076-01. Since we could not locate the December 27, 1990 application referenced in License Condition 12.A. of your current license, we have had to gather additional information including an updated Operating and Emergency Procedures. While your Operating and Emergency Procedures contain much needed information to process this amendment request, we still need additional information to ensure that the license is written correctly. In order to continue our review, we need the following additional information:

1. Submit an outline of the training to be given to prospective radiographers and radiographer's assistants. Submit procedures for experienced radiographers who have worked for another licensee.
2. Provide a copy of a typical examination and the correct answers to the examination questions. Your Operating and Emergency procedures refer to a test with a passing grade of 85.
3. Specify the qualifications of your instructors in radiation safety principles and describe their experience with radiography. If training will be conducted by someone outside your organization, identify the course by title and provide the name and address of the company providing the training.
4. Describe the field (practical) examination that will be given to prospective radiographers and radiographer's assistants. The NRC suggests using the checklist in Appendix H of NUREG-1556, Volume 2 (copy enclosed) as a source of potential areas to review during the field examination.

5. Describe the annual refresher training program, including topics to be covered and how training will be conducted.
6. Submit your procedures for verifying and documenting the certification status of radiographers and for verifying that their certification remains valid. As a minimum your procedures for newly hired, previously certified individuals should require documentation of your contacting the certifying entity and confirming the certification. Your procedures should also ensure you are aware of certification expiration dates and that individuals with expired certifications do not act as radiographers.
7. Describe the storage location(s) at temporary job sites and submit a diagram showing where the radiography camera will be stored at the field stations. Indicate whether or not radiography will be performed at your location as a temporary job site since you do not have a permanent radiography installation. Provide a diagram of this location and its surroundings, including a description of adjacent property.
8. Include instructions for performing source exchanges.
9. In paragraph 6.4.5 of your Operating and Emergency Procedures, you indicate that Technical Operations of Burlington, Massachusetts will supply a leak test kit. This company has changed their name. Please update the name of the company listed.
10. In Procedure No. 7 (Emergency Procedures) and Procedure No. 17 (Transportation of Radioactive Sources) in your Operating and Emergency Procedures, please replace NRC Region II with NRC Operations Center which is manned 24 hours per day, 7 days per week. Their telephone number is (301) 816-5100. All emergencies should be reported to the NRC Ops Center. Please change your procedure to reflect this change.
11. In section 3 of Procedure No. 17 (Transportation of Radioactive Sources), please replace the Department of Transportation regulation citation listed as 49 CFR L73.393(a) with 49 CFR 173.393(a).
12. Please note that our standard license condition authorizing source retrievals does not list personnel by name. You should revise the last sentence in paragraph 1.1 in Procedure No. 26 (Emergency Source Retrieval Operational Guidelines) to reflect this matter.

Current NRC regulations and guidance are available at the NRC Web sites listed below or by contacting the Government Printing Office (GPO) toll-free at 1-888-293-6498. The GPO is open from 7:00 a.m. to 9:00 p.m. EST, Monday through Friday (except Federal holidays).

We will continue our review upon receipt of this information. Please reply to my attention at the Region I Office and refer to Mail Control No. 136270. If you have any technical questions regarding this deficiency letter, please call me at (610) 337-5251.

D. McCallister
Huntington Testing & Technology, Inc.

3

If we do not receive a reply from you within 15 calendar days from the date of this letter, we shall assume that you do not wish to pursue your application.

Sincerely,

Original signed by Kathy Dolce Modes

Kathy Dolce Modes
Health Physicist
Security and Industrial Branch
Division of Nuclear Materials Safety

Enclosure:
NUREG-1556, Volume 2

NRC Web site addresses

NRC regulations

<http://www.nrc.gov/reading-rm/doc-collections/cfr/>

Licensing guidance

<http://www.nrc.gov/reading-rm/doc-collections/nuregs/staff/sr1556/>

General Policy and Procedure for NRC Enforcement Actions

<http://www.nrc.gov/what-we-do/regulatory/enforcement/enforc-pol.pdf>

206 of the Energy Reorganization Act of 1974

<http://www.nrc.gov/who-we-are/governing-laws.html>

D. McCallister
Huntington Testing & Technology, Inc.

4

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