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(13469)  
030-20094 → 35-00502-05

Halliburton Industrial Services, Inc.  
ATTN: John Knox  
President  
P.O. Box 297  
Duncan, Oklahoma 73536

Gentlemen:

This refers to your application dated December 24, 1982 for a byproduct material license to authorize the possession, storage and decontamination of equipment removed from nuclear power plants. Additional information is needed in support of your application.

It is our understanding that you plan to perform decontamination services in nuclear power plant facilities and at your facility located in Zanesville, Ohio. Also, it is our understanding that you will possess equipment containing licensee material in trailers for transportation purposes anywhere in the United States and for storage purposes at your facilities in New Jersey, Ohio, New Hampshire, North Carolina, and Illinois. You should note that all of your activities at nuclear power plants will be subject to the provisions of the licenses issued to those facilities. Any possession of licensed material in North Carolina and other Agreement States (see attached) Agreement State list) will be subject to the regulations in those states, i.e., your NRC license will not authorize your possession of licensed material in any Agreement State. Please provide us with a brief statement to show that you have a clear understanding as to the locations where you will be authorized to possess licensed material under your new byproduct material license.

In addition to the above, we need additional information as outlined in the following paragraph. For your guidance in providing the information. We have attached a copy of Regulatory Guide 10.7 GUIDE FOR THE PREPARATION OF APPLICATIONS FOR LICENSES FOR LABORATORY AND INDUSTRIAL USE OF SMALL QUANTITIES OF BYPRODUCT MATERIAL. Other guides are also attached as specifically referenced below. Please provide the following information:

1. Facility locations - Please provide the street addresses for your facilities listed on pages S-1 and D-1 of attachment of your application. Refer to Item 5 in the guide.

B-18

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2. TLD's - Please specify the frequency of exchange of the TLD's - Refer to Item 12.
3. Bioassay program - Describe your bioassay program for employees who handle hydrogen 3, iodine 125 or iodine 131. See Item 12 in Guide 10.7 and the two (2) bioassay guides (attached) for hydrogen 3 and iodines. Please note that if after your evaluation and review of the guidelines in the referenced guides, you conclude that a bioassay program is not necessary, you should provide a brief description of your evaluation to support your decision.
4. Exposures to employees hands - Although your application indicates that you will likely possess equipment with relatively high beta-gamma surface readings we found nothing in your application showing how you will evaluate and control exposures to employees hands. Please provide this information. Please note that we consider the handling of radioactive materials with the bare hands to be an unacceptable procedure.
5. Radiation survey program - Your application contained minimal information concerning your radiation survey programs - Please refer to item 15a in the enclosed Guide 10.7 and describe your radiation survey program. This should include instrument surveys to determine external, or fixed, radiation levels and wipe tests to determine removable contamination levels (beta-gamma and alpha). An acceptable program to us would include daily surveys (or during the use of licensed materials) by the individual users and audits by your Radiation Protection Officer at periodic intervals. Also, you should provide the following information:
  - a. Your established external radiation levels for equipment to be removed to your facility for decontamination.
  - b. Your established limits for external radiation levels and removable contamination for your facility floors, work benches, trailers, etc. which are acceptable, and the levels which would require decontamination.
6. Control of liquid effluents - Your application appears to indicate that liquids will be used in your decontamination work. If this is the case, you should provide us with information showing how you control your effluent releases to prevent entry into unrestricted areas. It would not be acceptable to us for you to have a direct drainage line from your decontamination pad to the sanitary sewerage system. You should also describe in more detail how you would prepare liquid waste for disposal by an authorized agency.

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-3-

7. Control of airborne releases. It seems reasonable to assume that since you will, apparently, use liquid in decontamination activities that you will have airborne contamination under certain circumstances. If you will use liquid or you have equipment with a potential for release of dusts, mists, etc., we need information showing how you will evaluate and control airborne releases. We believe you should also consider the use of respirators for your employees involved in some aspects of your decontamination work. This should be considered merely as a precautionary measure in the event unexpected airborne contamination is encountered.
8. Instructions to personnel (general) - Please refer to Item 15.d in Guide 10.7 and provide information showing the kinds of written instruction provided to your employees for Items 15.d (1) through (12).
9. Instructions to personnel - Emergency Procedures. Refer to Item 15.d (13) in Guide 10.7 and provide information as to the instructions provided to your employees in the event of fire, spills, truck wrecks, etc. You should provide clear instructions in order for your employees to have a good understanding of what they are to do in the event of emergencies. You may, for example, in the event of a truck wreck, only want your employees to secure the radioactive material and to telephone your Radiation Protection Officer for further instructions.
10. Transportation. Please provide a brief description of your transportation procedures to assure that you meet all requirements of the U.S. Department of Transportation (DOT). If you need some assistance in this matter, please contact Bill Wilson 201 - 426-0033 or Russ Fiste 201-426-0701 at DOT.
11. Radiation Protection Officer - Although, you have designated Paul J. Pettit as your over-all Radiation Protection Officer, we believe you should consider naming alternates at each of your facilities. These alternates should be experienced type persons with some experience in radiation safety and knowledgeable of your procedures and operations.

Our review of your application will continue upon receipt of the above information. Please provide two copies of your reply and reference Mail Control No. 13469.

Sincerely,

cc: Halliburton Industrial Services  
ATTN: Paul J. Pettit, Ph.D.  
Manager of Nuclear Projects  
910 Clopper Road  
Gaithersburg, MD 20878

Paul R. Guinn  
Material Licensing Branch  
Division of Fuel Cycle and  
Material Safety

Enclosures: As stated

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URNAME	PGuinn/sc						
DATE	1/14/83						