

Conversation Record



Jennifer Bishop
Materials Licensing Branch
U.S. Nuclear Regulatory Commission
Region III
2443 Warrenville Road
Lisle, Illinois 60532-4351
Jennifer.Dalzell-Bishop@nrc.gov

TO: Gregory Nehring

COMPANY: Engineering Surveys and Services, LLC.

Date: April 2, 2012

PAGES: 4 TEL.: 660-826-8618

FAX #: 660-826-6158

(630) 829-9607 FAX: (630) 515-1078

EMAIL: gnehring@ess-inc.com

CONVERSATION RECORD

TIME	DATE
3:00pm	4/5/2012 (Date Contacted)
	4/9/2012 (Date Transmitted)

NAME OF PERSON(S) CONTACTED	TELEPHONE NO.	ORGANIZATION
-----------------------------	---------------	--------------

Gregory Nehring	660-826-8618	Radiation Safety Officer
-----------------	--------------	--------------------------

License No.: 24-20089-01

Control No.: 577183

SUMMARY

For guidance on preparing all licensing correspondence, please use NUREG 1556 Vol. 1, Rev. 1, "Consolidated Guidance About Materials Licenses - Program-Specific Guidance About Portable Gauge Licenses." This document can be found at:

<http://www.nrc.gov/reading-rm/doc-collections/nuregs/staff/sr1556/v1/r1/>

This refers to your renewal application dated March 6, 2012 (with attachments) and the phone conversation between Gregory Nehring and Jennifer Bishop on April 5, 2012.

- A. During our review of your application dated March 6, 2012, we noted that no information was provided for the radionuclides, manufacturer's names and model numbers, and position limits. This section has changed since the last revision of NUREG 1556, Vol. 1, Rev1.

We now require a total possession limit for each radionuclide requested, as well as providing the "per source" activity you need, which should match the Sealed Source and Device Registry certificate procured by the vendor.

RESPONSE: Please provide the radionuclides you want to continue authorization for, the chemical/physical forms of each (such as sealed sources,) the manufacturer's names and model numbers for the sealed sources and gauging devices, and the maximum "per source" and total possession limit you want for

each radionuclide. It is acceptable to request more sealed sources than you may actually need immediately, to allow for some growth, so long as the request is reasonable and realistic.

- B. Please also note that, contrary to Item 7 in NUREG 1556, Vol.1, Rev. 1, you will not be able to change and name your RSO internally; NRC must do that for you via the amendment process. This is another section that has changed since the last revision on NUREG 1556.

RESPONSE: Please provide a written, signed (by the incumbent RSO and senior management,) and currently dated statement that stipulates your incumbent RSO accepts the RSO position and understands the duties and responsibilities associated with the position. Please also submit a new "Delegation of Authority" for your RSO that is signed by a senior management official. A sample memo can be found in Attachment 1 of this document..

- C. The following were noted as additional deficiencies within your application:

1. The Certifying Official section for the NRC Form 313, "Application for Materials License," signed March 6, 2012, was not apparently signed by your management.

RESPONSE: Please resubmit the NRC Form 313, attached, including all applicable information and a signature by a senior management Certifying Official. Please include this official's title/position. The form should include the name, address, fax number, and email address for at least one person, usually the RSO, to which all future correspondence regarding this license should be mailed.

2. The address provided on NRC Form 313 as your current mailing address does not match the one on your current license. Your current license has your zip code as 65401. The zip code used on your application is 65201.

RESPONSE: Please verify the addresses where the material will be stored are correct on the application.

3. Please clarify whether you perform tests or measurements with your portable gauges involving insertion of an unshielded source rod into a hole more than 3 feet below the surface.

If you do, please be advised that we will be adding a standard license condition to your renewed license, as shown in Condition No. 21 on the sample license in Appendix L, in the NUREG guidance document mentioned above.

If you do not, please so state, in a complete and explicit manner.

We will be unable to continue processing your request until we receive this information. In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice," a copy of this letter will be available electronically in the NRC Public Document Room or from the Publicly Available Record (PARS) component of NRC's document system (ADAMS) accessible from the NRC Website at <http://www.nrc.gov/reading-rem/adams.html>.

Please also be reminded of the provisions in 10 CFR 30.9(a), "Completeness and accuracy of information,"..."(a) Information provided to the Commission by an applicant for a license or by a licensee or information required by statute or by the Commission's regulations, orders, or license conditions to be maintained by the applicant or the licensee shall be complete and accurate in all material respects."

Submit the requested information within 30 calendar days (by May 5, 2012) by referencing control number 577183 to facilitate proper handling in our office. Please contact me if you need to make alternative response arrangements.

Upon receipt of your response we will resume our review. Address your written response to my attention at the above address and please be sure to reference control no. 577183. Providing an email address for the contact person is also very helpful.

PLEASE DIRECT ANY QUESTIONS YOU MAY HAVE TO ME AT (630) 829-9607.

NAME OF PERSON DOCUMENTING
CONVERSATION

SIGNATURE
DATE

Jennifer Bishop

Jennifer Bishop

4/5/2012

Edleen Carroll Casey

4/6/2012

Attachment 1**Model Delegation of Authority:**

Memo To: Radiation Safety Officer
From: Chief Executive Officer
Subject: Delegation of Authority

You, _____, have been appointed Radiation Safety Officer and are responsible for ensuring the safe use of radiation. You are responsible for managing the Radiation Protection Program; identifying radiation protection problems; initiating, recommending, or providing corrective actions; verifying implementation of corrective actions; stopping unsafe activities; and ensuring compliance with regulations. You are hereby delegated the authority necessary to meet those responsibilities, including prohibiting the use of byproduct material by employees who do not meet the necessary requirements and shutting down operations where justified to maintain radiation safety. You are required to notify management if staff does not cooperate and does not address radiation safety issues. In addition, you are free to raise issues with the Nuclear Regulatory Commission at any time. It is estimated that you will spend ___ hours per week conducting radiation protection activities.

Signature of Management Representative

Date

I accept the above responsibilities,

Signature of Radiation Safety Officer

Date

cc: Affected department heads