



**UNITED STATES
NUCLEAR REGULATORY COMMISSION**
REGION IV
1600 E. LAMAR BLVD
ARLINGTON TX 76011-4511

April 5, 2016

Mr. Bryan McDonald, President
Audubon Field Solutions, LLC
10205 Westheimer Road, Suite 100
Houston, TX 77042

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION

Dear Mr. McDonald:

The Nuclear Regulatory Commission (NRC) has initiated the technical review of the license application dated March 17, 2016 submitted by Audubon Field Solutions, LLC, and the following deficiencies were identified in the application.

1. The applicant did not follow NRC's licensing guidance described in NUREG-1556, Volume 1, revision 1, when submitting the license application request.
2. The Radiation Safety Plan makes reference to RH-2364 which is not an NRC regulation, did not incorporate NRC security requirements for portable gauges, and is outdated (dated 9-1-1997).
3. The applicant requested authorization for two portable gauges (no model numbers were specified) while the millicurie activity being requested is equivalent to four portable gauges.
4. The manufacturer's name and model number of the sealed sources requested represent Troxler Electronic Laboratories Model 3400 Series gauges while shipping papers and bill of lading submitted with the application state CPN International Model MC and 501 Series gauges.
5. The radiation safety officer and gauge user training certificate for Scott A. Wallace from Cline's Technical Services dated August 14, 2015, has driver license information that is illegible and appears to be expired.
6. The American Portable Nuclear Gauge Association (APNGA) training certificate for Scott A. Wallace dated September 18, 2015 is not signed by the radiation safety officer or a company manager.
7. The application contained excess license application fee.
8. NRC Form 313 lists the applicant as "Audubon Field Solutions, LLC" with contact telephone number 281-669-0590. The operator that answers the telephone identifies the company as "Audubon Engineering".

9. The diagram for the storage location provided in the application is generic and lists the address as 1234 Main Road, Out Town, State. The proposed storage location in Clarksburg, West Virginia, is currently occupied by a surveying, mapping and materials testing company called Energy Surveys, Inc. who is not the license applicant.
10. The description of portable gauge security while gauges are in storage is generic and appears not to meet 10 CFR 30.34(i).

Please provide the following information to continue the review process. Provide the response in a signed and dated letter, in company letterhead, within 30 days from receipt of this letter, and make reference to mail control number 590527.

1. Complete Appendix B of NUREG-1556, Volume 1, revision 1, and provide the information requested in this checklist. Provide source manufacturer's name and model number. Provide portable gauge manufacturer's name and model number. Indicate number of gauges being requested. This document can be found at: www.nrc.gov/reading-rm/doc-collections/nuregs/staff/sr1556/.
2. Provide copy of updated Radiation Safety Plan and updated bill of lading.
3. 10 CFR 30.34 requires that "each portable gauge licensee shall use a minimum of two independent physical controls that form tangible barriers to secure portable gauges from unauthorized removal, whenever portable gauges are not under the control and constant surveillance of the licensee" (i.e., when not in use). Guidance on these security procedures is provided in the errata sheet to Appendix H of NUREG-1556, Volume 1, revision 1, which may be found at: www.nrc.gov/reading-rm/doc-collections/nuregs/staff/sr1556/v1/r1/.

Commit to the following language: "We will implement and maintain the "Operating, Emergency, and Security Procedures" in the errata sheet to Appendix H of NUREG-1556, Volume 1, Revision 1, and provide copies of these procedures to all gauge users and at each job site."

4. Provide radiation safety officer and gauge user training certificate for Scott A. Wallace from Cline's Technical Services dated August 14, 2015 with legible driver license information and unexpired.
5. Provide APNGA training certificate for Scott A. Wallace dated September 18, 2015 signed and dated by company president.
6. Provide site specific diagram for the storage location in Clarksburg, West Virginia. Describe construction of gauge storage location that demonstrate adequate shielding. Describe portable gauge security that meets 10 CFR 30.34(i).
7. Describe the business relationship between Audubon Field Solutions, LLC, Audubon Engineering, and Energy Surveys, Inc.
8. Describe what company (Audubon Field Solutions, LLC, or Audubon Engineering or Energy Surveys, Inc.) will be using portable gauges and provide examples of proposed projects in which portable gauges will be used in West Virginia.

9. Indicate which company (Audubon Field Solutions, LLC, or Audubon Engineering, or Energy Surveys, Inc.) employs Scott A. Wallace. Provide supporting written documentation.
10. Provide copy of certificate issued by the State of Texas that authorizes Audubon Field Solutions, LLC, to conduct business in the State of Texas. Indicate year Audubon Field Solutions, LLC, was created.
11. Provide copies of proof of business insurance and federal tax identification number for Audubon Field Solutions, LLC.
12. Provide an organization chart with individual's names, positions, and contact information for company Audubon Field Solutions, LLC, related to the radiation safety program.

You will be contacted at a later date to coordinate a pre-licensing visit. You can contact me at 817-200-1189 if you have any questions about this letter.

In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice," a copy of this letter will be available electronically for public inspection in the NRC Public Document Room or from the NRC's Agencywide Documents Access and Management System (ADAMS). ADAMS is accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html>.

Thank you for your cooperation.

Sincerely,

/RA/

Roberto J. Torres, M.S., Senior Health Physicist
Nuclear Materials Safety Branch B

Docket: 030-38915
Control: 590527