

**From:** [Lawyer, Dennis](#)  
**To:** [welldata.marianne@gmail.com](mailto:welldata.marianne@gmail.com)  
**Subject:** Well Data Services, Inc., Request for Additional Information Concerning Application for a License Amendment, Control 592247  
**Date:** Wednesday, November 16, 2016 2:32:00 PM

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Dear Ms. Skeens,

This is in reference to your application dated October 18, 2016, requesting for amendment to Nuclear Regulatory Commission License No. 45-25569-01, Docket No. 03035769. In order to continue our review, we need the following additional information:

1. You have requested that Dr. Lee S. Anthony be named Radiation Safety Officer (RSO) on your license. It appears that this individual may be an outside consultant\contractor. If this is so, in support of this request, please address the following:
  - a. Describe the control over the radiation safety program that will be delegated so that the consultant-RSO will be able to exercise authority over authorized users when confronted with radiation safety problems that require implementation of corrective actions.
  - b. Describe the relationship that will exist between the consultant-RSO and your institutional management regarding expenditure of funds to facilitate the objectives of your radiation safety program and related regulatory requirements.
  - c. Identify other commitments of the consultant-RSO for other NRC or Agreement State licensed facilities, along with a description of how the consultant-RSO will allocate time to permit the performance of the duties of the RSO as described in the regulations. State the consultant-RSO's minimum amount of on-site time (hours per week).
  - d. Appoint an in-house representative who will serve as the point of contact during the RSO's absence. This person may be allowed to assist the consultant RSO with limited authority.
  - e. Describe the overall availability of the consultant-RSO to respond to questions or operational issues that arise during the conduct of your radiation safety program and related regulatory requirements. Specify the maximum amount of time it will take the RSO to arrive at the facility in the event of an emergency that requires his presence.
2. NUREG-1556, Volume 14, "Consolidated Guidance About Material Licenses, Program-Specific Guidance About Well Logging, Tracer, and Field Flood Study Licenses, states in section 8.7.1 to provide information demonstrating the proposed RSO is qualified by training and experience. One method is to provide a NRC or Agreement State license that lists a radiation safety program of comparable size and scope. You provided two agreement state medical licenses with the candidate listed as the Radiation Safety Officer. This appears to be a different scope than well logging. Please provide additional training and/or experience the candidate has had with well logging operations.
3. Due to a recent change in how NRC writes licenses, please provide the amount of material you would like to be licensed for each model of source on your license.

We will continue our review upon receipt of this information. Please reply to my attention at the Region 1 Office (Address below) and refer to Mail Control No. 592247. If you have technical questions regarding this letter, please call me at (610) 337-5366.

Your reply must be an originally signed and dated letter. The letter may be scanned and submitted as a pdf document attached to an email; or it may be transmitted by facsimile to (610) 337-5269; or it may be sent by regular mail. If we do not receive a reply from you within 30 calendar days from the date of this e-mail, we will assume that you do not wish to pursue your application.

Please respond by e-mail to acknowledge that you have received the e-mail request for additional information.

Region 1 Office Mailing Address: Licensing Assistance Team, US Nuclear Regulatory Commission Region I, 2100 Renaissance Boulevard, Suite 100, King of Prussia, PA 19406-2713.

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