J-6

This is in reference to our application dated October 7, 2016, requesting for amendment to Nuclear Regulatory Commission License No. 47-35262-01, Docket No. 03038861.

We would like to be licensed for 2 (two) nuclear density gauges Humbolt Scientific Model 5001-SD with Cs-137 sealed source # Humbolt 2200064 not to exceed 11 millicuries per source, and Am-241 sealed source # Humbolt 2200067 not to exceed 44 millicuries per source. Totals: 22 mCi of Cs-137 and 88mCi of Am-241.

The Radiation Safety Officer's training specific to Portable Gauge Licenses for myself, Sean E. O'Hara is attached.

All users of Portable Gauges will be trained before using licensed material in accordance with NUREG-1556 Vol. 1 at Humbolt Scientific. Training is to include;

- Atomic Theory
- Radiation Safety
- Dose/Shielding Calculations
- Accidents/Storage
- Operation
- Field Applications
- Transportation
- Risk
- ALARA
- Measurement Theory
- Calibration
- Maintenance

The portable gauges will be stored within our vault with our other radiography sources. Even with the addition of the portable gauges, the public dose on the outside of the vault and adjacent areas calculates to well below 200mr/hr. As the already existing diagram included with our original license demonstrates.

We will provide and require the use of individual monitoring devices (dosimetry). All personal dosimeters that require processing to determine the radiation dose will be processed and evaluated by a NVLAP approved processor.

We will implement and maintain operating, emergency, and security procedures in Appendix G to NUREG-1556, Volume 1, revision 2, "Consolidated Guidance About Materials Licenses: Program-Specific Guidance About Portable gauge licenses." Copies of these procedures will be provided to all gauge users and will be available at each jobsite.

We will implement and maintain procedures for routine maintenance of our gauges according to each manufacturer's written recommendations and instructions.

The gauge manufacturer, or other person licensed by the NRC or an Agreement State will perform non-routine maintenance or repair operations that require detaching the source or source rod from the gauge.

Sean E. O'Hara Date: 12/06/2016

Sean E. O'Hara

General Manager / Radiation Safety Officer

PREMIER

P.O. Box 67
Clarksburg, WV 26302
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Lawyer, Dennis

From: Lawyer, Dennis
Sent: Thursday, October 27, 2016 6:45 AM
To: 'sohara@premierenergyserviceswv.com'
Subject: Premier Energy Services LLC, Request for Additional Information Concerning Application for a License Amendment, Control 592122

Dear Mr. O'Hara,

This is in reference to your application dated October 7, 2016, requesting for amendment to Nuclear Regulatory Commission License No. 47-35262-01, Docket No. 03038861. Since you are adding portable gauges to a radiography license, the commitments for certain areas are sufficient for all your material, however many commitments were specific to just radiographers and not to gauge users. Areas of material inventory and leak test performance was sufficient to be used for the gauges also, however you may wish to review these commitments and make other statements in case you wish make a specific commitment associated with the gauge use different than your radiography devices. In order to continue our review, we need the following additional information:

Please confirm that you wish to be licensed for two nuclear density gauges Humbolt Scientific, Inc. Model 5001 with only Cs-137 source and not the Am-241 sources. According to the Sealed source and device registry they have a maximum of 11 mCi of activity so confirm you wish to be licensed for 22 mCi of Cs-137.

Item 6 of the application form is to state the purpose the material will be used. Please state the purpose you wish to be licensed for this material.

You did not give your Radiation Safety Officer's training for portable gauges. NUREG-1556, Volume 1, Revision 2, "Consolidated Guidance
About Materials Licenses Program-Specific Guidance About Portable Gauge Licenses," section 8.7 states to provide documentation demonstrating that the proposed RSO is qualified by training and experience (e.g., certificate of completion of the RSO's course and/or the authorized
user's course). Please provide training documentation associated with gauge use.

You did not provide how portable gauge users would be trained. NUREG-1556, Volume 1, Revision 2, "Consolidated Guidance
About Materials Licenses Program-Specific Guidance About Portable Gauge Licenses," section 8.8 for the applicant to provide the statement "Before using licensed materials, authorized users will have successfully completed one of the training courses described under "Criteria" in the section titled "Training for Individuals Working in or Frequenting Restricted Areas" in NUREG–1556, Volume 1, Revision 2, 'Consolidated Guidance About Materials Licenses: Program-Specific Guidance About Portable Gauge License.'" Or a description of the training for proposed authorized users. Please provide this statement for personnel that will use portable gauges and the training for radiography has already been provided.

You did not provide facility information. It is unclear if you will store this material with your radiography sources or in another section of your facility.
NUREG-1556, Volume 1, Revision 2, "Consolidated Guidance About Materials Licenses Program-Specific Guidance About Portable Gauge Licenses," section 8.9 states to provide a facility diagram for each permanent portable gauge storage location. Include on the diagram the use of adjacent areas (including above and below), and information relevant to public dose and security as discussed in Sections 8.10.5, "Public Dose," and 8.10.6, "Operating, Emergency, and Security Procedures," respectively, in NUREG–1556, Vol. 1, Rev. 2, "Consolidated Guidance About Materials Licenses: Program-Specific Guidance About Portable Gauge Licenses." Please provide this information for your gauge storage.