



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION IV
1600 EAST LAMAR BLVD
ARLINGTON, TEXAS 76011-4511

EMAIL



Name: William J. Ledford License: 30-29276-01
Docket: 030-37577
Control: 601446
Organization: Wilson & Company, Inc.
Phone: 505-348-4800
E-mail Address: William.ledford@wilsonco.com
From: Jacqueline D. Cook
Date: January 22, 2018
Subject: Application dated September 18, 2017 for License Renewal
Pages: 2

Mr. Ledford:

Per your application dated September 18, 2017, the items on the next page are deficiencies which require your response. **Please respond to this e-mail by Monday, February 5, 2018.** Our fax number is (817) 200-1263. You may respond by e-mail in pdf format if you'd like. My email address is Jackie.Cook@nrc.gov. When responding to this e-mail, please include the license, docket and control numbers located at the top of this page.

Please note that your renewal application was reviewed using NUREG-1556, Vol. 1, Rev. 2, "Consolidated Guidance About Materials Licenses: Program-Specific Guidance About Portable Gauge Licenses" dated June 2016 (<https://www.nrc.gov/reading-rm/doc-collections/nuregs/staff/sr1556/v1/>).

Thanking you in advance for your cooperation, assistance, and prompt response in this matter.

/RA/
Jacqueline D. Cook
Senior Health Physicist

PUBLIC

- ☐ Immediate Release
☒ Normal Release

NON-PUBLIC

- ☐ A.3 Sensitive-Security Related
☐ A.7 Sensitive Internal
☐ Other: _____

Reviewer: JDC

Date: 1/22/18

1. Please note that currently you are authorized for use or storage at a location in Douglas, Wyoming as identified in Item 10.A. of your license; however, in your renewal application dated September 18, 2017, this use or storage location was not included.

Please explain this discrepancy.

If gauges are no longer used or stored at this location, please provide copies of the latest leak tests results of the gauges used at this location and please confirm, if applicable, that no sealed sources leaked while being used or stored at this facility.

2. A. Please note that in your cover letter dated September 15, 2017 of your renewal application dated September 18, 2017, you stated that the model of some of the gauges you will be using is Seaman Nuclear Corporation Model 75-B; however, Items 9.A. and B. currently authorize you for Seaman Nuclear Corporation Model C-75 BP.

Please clarify this discrepancy.

- B. In addition in your cover letter, you stated that the model of some of the gauges you will be using is Seaman Nuclear Corporation Series 75; however, Item 9.E. currently authorize you for Seaman Nuclear Corporation Model C-75.

Please clarify this discrepancy.

3. A. Please note that Condition 12 of your current license specifies Mr. Robert Molina as the Radiation Safety Officer (RSO).

However, please note that Item 7 of your cover letter to your renewal application listed three individuals as the RSOs; however, only one person can be specified as the RSO on your license.

Please clarify this discrepancy.

- B. If Mr. Molina is no longer the RSO, please specify the date he ceased performing his duties as RSO.
- C. If you plan to select one of the individuals listed in Item 7 of your cover letter as RSO, please submit documentation demonstrating that the proposed RSO's training and experience (e.g., certificate of completion of the RSO's course and/or the authorized user's course).

4. If you will still be using or storing licensed material at your facility identified in Condition 10.A. of your license, please provide a facility diagram which should include 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 refer to Item 1 above).

5. Please commit: "Before using licensed materials, authorized users will have successfully completed one of the training courses described in the 'Criteria' part of the section titled 'Training for Individuals Working In or Frequenting Restricted Areas' in NUREG-1556, Vol. 1, Rev. 2, dated June 2016."
6. Please expand Item 10.c. of your cover letter to include the phrase "or at other intervals approved by the NRC"

AND

Please commit: "We will develop, implement, and maintain procedures for ensuring accountability of licensed materials at all times."

7. For nonroutine maintenance, please commit: "The gauge manufacturer or other person licensed by the NRC or an Agreement State will perform nonroutine maintenance or repair operations that require detaching the source or source rod from the gauge".
8. Please resubmit NRC Form 313 signed by a certifying officer who is a representative of the corporation or legal entity (Wilson & Company, Inc.). The representative signing the application must be authorized to make binding commitments and to sign official documents on behalf of the licensee.

We cannot accept Mr. William J. Ledford's signature as the RSO because he is not the RSO currently authorized on the license.