MATERIALS LICENSE

Pursuant to the Atomic Energy Act of 1954, as amended, the Energy Reorganization Act of 1974 (Public Law 93-438), and Title 10, Code of Federal Regulations, Chapter I, Parts 30, 31, 32, 33, 34, 35, 39, 40 and 70, and in reliance on statements and representations heretofore made by the licensee, a license is hereby issued authorizing the licensee to receive, acquire, possess, and transfer byproduct, source, and special nuclear material designated below; to use such material for the purpose(s) and at the place(s) designated below; to deliver or transfer such material to persons authorized to receive it in accordance with the regulations of the applicable Part(s). This license shall be deemed to contain the conditions specified in Section 183 of the Atomic Energy Act of 1954, as amended, and is subject to all applicable rules, regulations and orders of the Nuclear Regulatory Commission now or hereafter in effect and to any conditions specified below.

Licensee	
1. Burgess Engineering & Testing, Inc.	3. License number 35-27554-01
2. 1819 Bowling Green Norman, Oklahoma 73071	4. Expiration date January 31, 2002
	5. Docket or Reference No 030-34324

6. Byproduct, source, and/or special nuclear material	7. Chemical and/or physical form	8. Maximum amount that licensee may possess at any one time under this license
A. Cesium-137	A. Sealed sources registered either with NRC under 10 CFR 32.210 or with an Agreement State and incorporated in a compatible gauging device as specified in Item 9 of this license	A. See Condition 9.A.
B. Americium-241	B. Sealed sources registered either with NRC under 10 CFR 32.210 or with an Agreement State and incorporated in a compatible gauging device as specified in Item 9 of this license	B. See Condition 9.B.

9. Authorized use

A., B., and C. To be used, for measurement purposes, in compatible portable Boart Longyear Company (formerly Campbell Pacific Nuclear Company), Humboldt Scientific, Inc., Seaman Nuclear Corporation and/or Troxler Electronic Laboratories, Inc. gauging devices that have been registered either with NRC under 10 CFR 32.210 or with an Agreement State and have been distributed in accordance with an NRC or Agreement State specific license authorizing distribution to persons specifically authorized by an NRC or Agreement State license to receive, possess, and use the devices.

200024

OFFICIAL RECORD COPY

NL40

MATERIALS LICENSE
SUPPLEMENTARY SHEET

License Number
35-27554-01

Docket or Reference Number
030-34324

CONDITIONS

10. Licensed material may be used at the licensee's facilities located at 2603 N. Shields Blvd., Moore, Oklahoma, and may be used at temporary job sites of the licensee anywhere in the United States where the U.S. Nuclear Regulatory Commission maintains jurisdiction for regulating the use of licensed material.

11. A. Licensed material shall only be used by, or under the supervision and in the physical presence of, the Radiation Safety Officer or individuals who have successfully completed the manufacturer's training program for gauge users, have received copies of, and training in, the licensee's operating and emergency procedures, and have been designated by the Radiation Safety Officer.

B. The Radiation Safety Officer for this license is Ali Honarmand-Ebrahimi.

12. A. Sealed sources and detector cells shall be tested for leakage and/or contamination at intervals not to exceed 6 months or at such other intervals as specified by the certificate of registration referred to in 10 CFR 32.210 or by an Agreement State.

B. Notwithstanding Paragraph A of this Condition, sealed sources designed to emit alpha particles shall be tested for leakage and/or contamination at intervals not to exceed 3 months.

C. In the absence of a certificate from a transferor indicating that a leak test has been made within 6 months prior to the transfer, a sealed source or detector cell received from another person shall not be put into use until tested.

D. Sealed sources need not be leak tested if:

(i) they contain only hydrogen-3; or

(ii) they contain only a radioactive gas; or

(iii) the half-life of the isotope is 30 days or less; or

(iv) they contain not more than 100 microcuries of beta and/or gamma emitting material or not more than 10 microcuries of alpha emitting material; or

12. D. (Continued

(v) they are not designed to emit alpha particles, are in storage, and are not being used. However, when they are removed from storage for use or transferred to another person, and have not been tested within the required leak test interval, they shall be tested before use or transfer. No sealed source or detector cell shall be stored for a period of more than 10 years without being tested for leakage and/or contamination.

E. The leak test shall be capable of detecting the presence of 0.005 microcurie of radioactive material on the test sample. If the test reveals the presence of 0.005 microcurie or more of removable contamination, a report shall be filed with the U.S. Nuclear Regulatory Commission in accordance with 10 CFR 30.50(b)(2), and the source shall be removed immediately from service and decontaminated, repaired, or disposed of in accordance with Commission regulations. The report shall be filed within 5 days of the date the leak test result is known with the U.S. Nuclear Regulatory Commission, Region IV, 611 Ryan Plaza Drive, Suite 400, Arlington, Texas 76011, ATTN: Director, Division of Nuclear Materials Safety. The report shall specify the source involved, the test results, and corrective action taken.

F. The licensee is authorized to collect leak test samples for analysis by Troxler Electronic Labs., Inc.. Alternatively, tests for leakage and/or contamination may be performed by persons specifically licensed by the Commission or an Agreement State to perform such services.

13. Sealed sources or detector cells containing licensed material shall not be opened or sources removed from source holders by the licensee.

14. The licensee shall conduct a physical inventory every 6 months to account for all sources and/or devices received and possessed under the license.

15. Each portable gauge shall have a lock or outer locked container designed to prevent unauthorized or accidental removal of the sealed source from its shielded position. The gauge or its container must be locked when in transport, storage, or when not under the direct surveillance of an authorized user.

16. Except for maintaining labeling as required by 10 CFR Part 20 or 71, the licensee shall obtain authorization from NRC before making any changes in the sealed source, device, or source-device combination that would alter the description or specifications as indicated in the respective Certificates of Registration issued either by the Commission pursuant to 10 CFR 32.210 or by an Agreement State.

MATERIALS LICENSE
SUPPLEMENTARY SHEET

License Number
35-27554-01

Docket or Reference Number
030-34324

17. Any cleaning, maintenance, or repair of the gauges that requires removal of the source rod shall be performed only by the manufacturer or by other persons specifically licensed by the Commission or an Agreement State to perform such services.

18. The licensee is authorized to transport licensed material only in accordance with the provisions of 10 CFR Part 71, "Packaging and Transportation of Radioactive Material."

19. The licensee shall not use sealed sources or probes containing sealed sources at depths exceeding 3 feet below the surface.

20. In addition to the possession limits in Item 8, the licensee shall further restrict the possession of licensed material to quantities below the minimum limit specified in 10 CFR 30.35(d) for establishing decommissioning financial assurance.

21. Except as specifically provided otherwise in this license, the licensee shall conduct its program in accordance with the statements, representations, and procedures contained in the documents, including any enclosures, listed below. The Nuclear Regulatory Commission's regulations shall govern unless the statements, representations, and procedures in the licensee's application and correspondence are more restrictive than the regulations.

A. Application dated December 20, 1996

FOR THE U.S. NUCLEAR REGULATORY COMMISSION

Date JAN 16 1997

By Original Signed By
Billie Gruszynski

Nuclear Materials Licensing Branch
Region IV
Arlington, Texas 76011

UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION IV
611 RYAN PLAZA DRIVE, SUITE 400
ARLINGTON, TEXAS 76011-8064

January 16, 1997

Burgess Engineering & Testing, Inc.
ATTN: Ali Honarmand-Ebrahimi
President
1819 Bowling Green
Norman, Oklahoma 73071

SUBJECT: NEW LICENSE

Please find enclosed License No. 35-27554-01. You should review this license carefully and be sure that you understand all conditions. If you have any questions, you may contact the reviewer who signed your license at (817)860-8120.

Please note that your license provides for other manufacturers in addition to those you requested in order that an amendment would not be required if you wish to possess gauges registered as stated in Item 9 of your license.

NRC expects licensees to conduct their programs with meticulous attention to detail and a high standard of compliance. Because of the serious consequences to employees and the public which can result from failure to comply with NRC requirements, you must conduct your program involving radioactive materials in accordance with the conditions of your NRC license, representations made in your license application, and NRC regulations. In particular, note that you must:

1. Operate in accordance with NRC regulations 10 CFR Part 19, "Notices, Instructions and Reports to Workers: Inspection and Investigations," 10 CFR Part 20, "Standards for Protection Against Radiation," and other applicable regulations.

2. Possess radioactive material only in the quantity and form indicated in your license.

3. Use radioactive material only for the purpose(s) indicated in your license.

4. Notify NRC in writing of any change in mailing address (no fee required if the location of radioactive material remains the same).

5. Request and obtain written NRC consent before transferring your license or any right thereunder, either voluntarily or involuntarily, directly or indirectly, through transfer of control of your license to any person or entity. A transfer of control of your license includes not only a total change of ownership, but also a change in the controlling interest in your company whether it is a corporation, partnership, or other entity. In addition, appropriate license amendments must be requested and

obtained for any other planned changes in your facility or program that are contrary to your license or contrary to representations made in your license application, as well as supplemental correspondence thereto, which are incorporated into your license. A license fee may be charged for the amendments if you are not in a fee-exempt category.

6. Maintain in a single document decommissioning records that have been certified for completeness and accuracy listing all the following items applicable to the license:

   - Onsite areas designated or formerly designated as restricted areas as defined in 10 CFR 20.3(a)(14) or 20.1003.

   - Onsite areas, other than restricted areas, where radioactive materials in quantities greater than amounts listed in Appendix C to 10 CFR 20.1001-20.2401 have been used, possessed, or stored.

   - Onsite areas, other than restricted areas, where spills or other unusual occurrences involving the spread of contamination in and around the facility, equipment, or site have occurred that required reporting pursuant to 10 CFR 30.50(b)(1) or (b)(4), including areas where subsequent cleanup procedures have removed the contamination.

   - Specific locations and radionuclide contents of previous and current burial areas within the site, excluding radioactive material with half-lives of 10 days or less, depleted uranium used only for shielding or as penetrators in unused munitions, or sealed sources authorized for use at temporary job sites.

   - Location and description of all contaminated equipment involved in licensed operations that is to remain onsite after license termination.

7. Submit a complete renewal application with proper fee, or termination request at least 30 days before the expiration date on your license. You will receive a reminder notice approximately 90 days before the expiration date. Possession of radioactive material after your license expires is a violation of NRC regulations.

8. Request termination of your license if you plan to permanently discontinue activities involving radioactive material.

You will be periodically inspected by NRC. Failure to conduct your program in accordance with NRC regulations, license conditions, and representations made in your license application and supplemental correspondence with NRC will result in enforcement action against you. This could include issuance of a notice of violation; imposition of a civil

penalty; or an order suspending, modifying, or revoking your license as specified in the "General Statement of Policy and Procedure for NRC Enforcement Actions" (Enforcement Policy), 60 FR 34381, June 30, 1995.

Thank you for your cooperation.

Sincerely,

Original Signed By
Billie Gruszynski

Billie Gruszynski (Ms.)
Nuclear Materials Licensing Branch

Docket: 030-34324
License: 35-27554-01
Control: 466286

Enclosures: As stated

DOCUMENT NAME: P:\BURGESS.CVR

To receive a copy of this document, indicate in the box "C" - Copy without attachment/enclosure "E" - Copy with attachment/enclosure "N" - No Copy

RIV:NMLB	N						
BGruszynski BG							
1/16/97							

OFFICIAL RECORD COPY

BETWEEN:

License Fee Management Branch, ARM
and
Regional Licensing Sections

(FOR LFMS USE)
INFORMATION FROM LTS

Program Code: 03121
Status Code: 3
Fee Category:
Exp. Date: 0
Fee Comments:
Decom Fin Assur Regd:

1997 JAN -7 PM 1:18

LICENSE FEE TRANSMITTAL

A. REGION IV

1. APPLICATION ATTACHED
Applicant/Licensee: BURGESS ENGINEERING & TESTING, INC.
Received Date: 961223
Docket No: 3034324
Control No.: 466286
License No.:
Action Type: New Licensee

2. FEE ATTACHED
Amount: $550.00
Check No.: 2

3. COMMENTS

Signed
Date 12/26/96 Billie Gruszynski

B. LICENSE FEE MANAGEMENT BRANCH (Check when milestone 03 is entered /)

1. Fee Category and Amount: 3P $550

2. Correct Fee Paid. Application may be processed for:
Amendment
Renewal
License /

3. OTHER

Signed
Date 1/7/97 Rita Messier

RECEIVED
JAN 14 1997
REGION IV

Log Jan 1 IV
Remitter
Check No. 10300 3632
Amount $550
Fee Category 3P
Type of Fee appl
Date Check Issued
Date Completed 1/7/97
By Ken

NRC FORM 313 (6-93)
10 CFR 30, 32, 33, 34, 35, 36, 39 and 40

U. S. NUCLEAR REGULATORY COMMISSION

APPROVED BY OMB: NO. 3150-0120
EXPIRES 6-30-96

ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS INFORMATION COLLECTION REQUEST: 9 HOURS. SUBMITTAL OF THE APPLICATION IS NECESSARY TO DETERMINE THAT THE APPLICANT IS QUALIFIED AND THAT ADEQUATE PROCEDURES EXIST TO PROTECT THE PUBLIC HEALTH AND SAFETY. FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE INFORMATION AND RECORDS MANAGEMENT BRANCH (MNBB 7714), U.S. NUCLEAR REGULATORY COMMISSION, WASHINGTON, DC 20555-0001, AND TO THE PAPERWORK REDUCTION PROJECT (3150-0120), OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON, DC 20503.

APPLICATION FOR MATERIAL LICENSE

INSTRUCTIONS: SEE THE APPROPRIATE LICENSE APPLICATION GUIDE FOR DETAILED INSTRUCTIONS FOR COMPLETING APPLICATION. SEND TWO COPIES OF THE ENTIRE COMPLETED APPLICATION TO THE NRC OFFICE SPECIFIED BELOW.

APPLICATION FOR DISTRIBUTION OF EXEMPT PRODUCTS FILE APPLICATIONS WITH:

DIVISION OF INDUSTRIAL AND MEDICAL NUCLEAR SAFETY
OFFICE OF NUCLEAR MATERIALS SAFETY AND SAFEGUARDS
U.S. NUCLEAR REGULATORY COMMISSION
WASHINGTON, DC 20555-0001

ALL OTHER PERSONS FILE APPLICATIONS AS FOLLOWS:

IF YOU ARE LOCATED IN:

CONNECTICUT, DELAWARE, DISTRICT OF COLUMBIA, MAINE, MARYLAND, MASSACHUSETTS, NEW HAMPSHIRE, NEW JERSEY, NEW YORK, PENNSYLVANIA, RHODE ISLAND, OR VERMONT, SEND APPLICATIONS TO:

LICENSING ASSISTANT SECTION
NUCLEAR MATERIALS SAFETY BRANCH
U.S. NUCLEAR REGULATORY COMMISSION, REGION I
475 ALLENDALE ROAD
KING OF PRUSSIA, PA 19406-1415

ALABAMA, FLORIDA, GEORGIA, KENTUCKY, MISSISSIPPI, NORTH CAROLINA, PUERTO RICO, SOUTH CAROLINA, TENNESSEE, VIRGINIA, VIRGIN ISLANDS, OR WEST VIRGINIA, SEND APPLICATIONS TO:

NUCLEAR MATERIALS LICENSING SECTION
U.S. NUCLEAR REGULATORY COMMISSION, REGION II
101 MARIETTA STREET, NW, SUITE 2900
ATLANTA, GA 30323-0199

IF YOU ARE LOCATED IN:

ILLINOIS, INDIANA, IOWA, MICHIGAN, MINNESOTA, MISSOURI, OHIO, OR WISCONSIN, SEND APPLICATIONS TO:

MATERIALS LICENSING SECTION
U.S. NUCLEAR REGULATORY COMMISSION, REGION III
799 ROOSEVELT ROAD
GLEN ELLYN, IL 60137-5927

ARKANSAS, COLORADO, IDAHO, KANSAS, LOUISIANA, MONTANA, NEBRASKA, NEW MEXICO, NORTH DAKOTA, OKLAHOMA, SOUTH DAKOTA, TEXAS, UTAH, OR WYOMING, SEND APPLICATIONS TO:

NUCLEAR MATERIALS LICENSING SECTION
U.S. NUCLEAR REGULATORY COMMISSION, REGION IV
611 RYAN PLAZA DRIVE, SUITE 400
ARLINGTON, TX 76011-8064

REGION IV
DEC 20 1996

ALASKA, ARIZONA, CALIFORNIA, HAWAII, NEVADA, OREGON, WASHINGTON, AND U.S. TERRITORIES AND POSSESSIONS IN THE PACIFIC, SEND APPLICATIONS TO:

RADIOACTIVE MATERIALS SAFETY BRANCH
U.S. NUCLEAR REGULATORY COMMISSION, REGION V
1450 MARIA LANE
WALNUT CREEK, CA 94596-5368

PERSONS LOCATED IN AGREEMENT STATES SEND APPLICATIONS TO THE U.S. NUCLEAR REGULATORY COMMISSION ONLY IF THEY WISH TO POSSESS AND USE LICENSED MATERIAL IN STATES SUBJECT TO U.S. NUCLEAR REGULATORY COMMISSION JURISDICTIONS.

1. THIS IS AN APPLICATION FOR *(Check appropriate item)*

- [**] A. NEW LICENSE
- [ ] B. AMENDMENT TO LICENSE NUMBER _____
- [ ] C. RENEWAL OF LICENSE NUMBER _____

2. NAME AND MAILING ADDRESS OF APPLICANT *(Include Zip code)*

BURGESS ENGINEERING AND TESTING, INC.
1819 BOWLING GREEN
NORMAN, OK 73071

3. ADDRESS(ES) WHERE LICENSED MATERIAL WILL BE USED OR POSSESSED

2603 N. SHIELDS BLVD.
MOORE, OK 73160

(SEE SECTION #3)

4. NAME OF PERSON TO BE CONTACTED ABOUT THIS APPLICATION

Ali Honarmand-Ebrahimi

TELEPHONE NUMBER (405)366-7548 Dec. 30
(405)790-0488 after Jan. 1, 97

SUBMIT ITEMS 5 THROUGH 11 ON 8-1/2 X 11" PAPER. THE TYPE AND SCOPE OF INFORMATION TO BE PROVIDED IS DESCRIBED IN THE LICENSE APPLICATION GUIDE.

5	RADIOACTIVE MATERIAL a. Element and mass number, b. chemical and/or physical form, and c. maximum amount which will be possessed at any one time	6	PURPOSE(S) FOR WHICH LICENSED MATERIAL WILL BE USED
7	INDIVIDUAL(S) RESPONSIBLE FOR RADIATION SAFETY PROGRAM AND THEIR TRAINING EXPERIENCE	8	TRAINING FOR INDIVIDUALS WORKING IN OR FREQUENTING RESTRICTED AREAS
9	FACILITIES AND EQUIPMENT	10	RADIATION SAFETY PROGRAM
11	WASTE MANAGEMENT	12	LICENSEE FEES *(See 10 CFR 170 and Section 170.31)* FEE CATEGORY AMOUNT ENCLOSED $ 550 CW

13. CERTIFICATION *(Must be completed by applicant)* THE APPLICANT UNDERSTANDS THAT ALL STATEMENTS AND REPRESENTATIONS MADE IN THIS APPLICATION ARE BINDING UPON THE APPLICANT.

THE APPLICANT AND ANY OFFICIAL EXECUTING THIS CERTIFICATION ON BEHALF OF THE APPLICANT, NAMED IN ITEM 2, CERTIFY THAT THIS APPLICATION IS PREPARED IN CONFORMITY WITH TITLE 10, CODE OF FEDERAL REGULATIONS, PARTS 30, 32, 33, 34, 35, 36, 39 AND 40, AND THAT ALL INFORMATION CONTAINED HEREIN IS TRUE AND CORRECT TO THE BEST OF THEIR KNOWLEDGE AND BELIEF.

WARNING: 18 U.S.C. SECTION 1001 ACT OF JUNE 25, 1948 62 STAT. 749 MAKES IT A CRIMINAL OFFENSE TO MAKE A WILLFULLY FALSE STATEMENT OR REPRESENTATION TO ANY DEPARTMENT OR AGENCY OF THE UNITED STATES AS TO ANY MATTER WITHIN ITS JURISDICTION.

CERTIFYING OFFICER -- TYPED/PRINTED NAME AND TITLE	SIGNATURE	DATE
Ali Honarmand-Ebrahimi, President	Ali H. Ebrahimi P.E.	12-20-96

FOR NRC USE ONLY

TYPE OF FEE	FEE LOG	FEE CATEGORY	AMOUNT RECEIVED	CHECK NUMBER	COMMENTS
			$		
APPROVED BY			DATE		466286

3. ADDRESS (ES) WHERE LICENSED MATERIAL WILL BE USED OR POSSESSED

Licensed material will be used at BURGESS ENGINEERING AND TESTING, INC., 2603 N. SHIELDS BLVD., MOORE, OKLAHOMA, 73160 and all temporary job sites of the licensee anywhere in the United States where the U.S. Nuclear Regulatory Commission maintains jurisdiction for regulating the use of licensed material. The above address is also the permanent storage location.

5. RADIOACTIVE MATERIAL

ITEM	ELEMENT AND MASS NUMBER	MANUFACTURER/distributor OF SEALED SOURCE	MAXIMUM AMOUNT THAT WILL BE POSSESSED AT ANY ONE TIME
1	Cesium-137	Sealed source(s) Troxler Electronic Laboratories, Inc. Drawing #102112	No single source to exceed 10 millicuries each
2	Americium-241:Be	Sealed source(s) Troxler Electronic Laboratories, Inc. Drawing #102451	No single source to exceed 50 millicuries each
3	Americium-241:Be	Sealed source(s) Troxler Electronic Laboratories, Inc. Drawing #100337	No single source to exceed 330 millicuries each
4	Americium-241:Be	Sealed source(s) Troxler Electronic Laboratories, Inc. Drawing #100608	No single source to exceed 110 millicuries each
5	Cesium-137	Sealed source(s) Humboldt Scientific Inc. Humboldt 2200064	No single source to exceed 11 millicuries each
6	Americium-241:Be	Sealed source(s) Humboldt Scientific Inc. Humboldt 2200067	No single source to exceed 44 millicuries each
7	Cesium-137	Sealed source(s) CPN Company, 0356/S Revision 5, August 1995	No single source to exceed 10 millicuries each
8	Americium-241:Be	Sealed source(s) CPN Company, GB/281/S854 valid 99	No single source to exceed 50 millicuries each

AUTHORIZED USE

1. For use in TROXLER model 3400-series, or 4640- series portable measuring gauges to measure density of construction materials.

2. For use in TROXLER model 3400-series portable measuring gauges to measure moisture of construction materials.

3. For use in TROXLER model 3241-series, portable measuring gauges to measure asphalt content of construction materials.

4. For use in TROXLER model 3241-series portable measuring gauges to measure asphalt content of construction materials.

5. For use in HUMBOLDT models HS-5001P and HS-5001C series portable measuring gauges to measure density of construction materials.

6. For use in HUMBOLDT models HS-5001P and HS-5001C series portable measuring gauges to measure moisture of construction materials.

7. For use in CPN models MC-1DR or MC-3 series portable measuring gauges to measure density of construction materials.

8. For use in CPN models MC-1DR or MC-3 series portable measuring gauges to measure moisture of construction materials.

Burgess Engineering and Testing, Inc. Will limit the possession of licenced material to the quantities such that it will not exceed the applicable limits set by **10 CFR 30.35(d)**.

6. PURPOSE FOR WHICH LICENCED MATERIAL WILL BW USED

1. For use in TROXLER model 3400-series, or 4640- series portable measuring gauges to measure density of construction materials.

2. For use in TROXLER model 3400-series portable measuring gauges to measure moisture of construction materials.

3. For use in TROXLER model 3241-series, portable measuring gauges to measure asphalt content of construction materials.

4. For use in TROXLER model 3241-series portable measuring gauges to measure asphalt content of construction materials.

5. For use in HUMBOLDT models HS-5001P and HS-5001C series portable measuring gauges to measure density of construction materials.

6. For use in HUMBOLDT models HS-5001P and HS-5001C series portable measuring gauges to measure moisture of construction materials.

7. For use in CPN models MC-1DR or MC-3 series portable measuring gauges to measure density of construction materials.

8. For use in CPN models MC-1DR or MC-3 series portable measuring gauges to measure moisture of construction materials.

The sealed sources will not be lowered below three (3) feet or (0.9144 meter).

7. INDIVIDUAL RESPONSIBLE FOR RADIATION SAFETY PROGRAM AND THEIR EXPERIENCE

1. Ali Honarmand-Ebrahimi is the Radiation Safety Office (RSO).

2. Ali Honarmand Ebrahimi has a B.S. and an M.S. in Civil Engineering.

3. Ali Honarmand-Ebrahimi has completed the following courses:

   A. Troxler Electronic Laboratories, Inc.'s training course for the use of nuclear testing equipment and training required by **49CFR172 SUBPART H** (copies attached).

   B. Hazardous Waste Operations Emergency Response (HAZWOPER) Initial 40 hours training course in accordance with OSHA regulation **29CFR1910.102(e)** and subsequent annual eight (8) hours refresher (copies attached).

4. The RSO's duties and responsibilities will be those of listed in Appendix C of "Draft Regulatory Guide DG-0008).

To insure that the RSO is up to date on federal, state and local regulations he will be attending the bi-annual training required by **49CFR172 SUBPART H**, annual training for HAZWOPER training and will be placed on the mailing list of NRC, EPA, FHWA, local department of transportation, local health and environmental department and the density gauge manufacturer to obtain the latest available regulatory information. The new regulations will be incorporated in to the license in a timely manner. The RSO (Ali Honarmand Ebrahimi) is the president of Burgess Engineering and Testing, Inc. And is the signatory of the NRC form 313. In addition to the responsibilities required from RSO the president of the incorporation will be responsible for the every day management of the incorporation.

TROXLER ELECTRONIC LABORATORIES, INC.

HEREBY CERTIFIES THAT

ALI H. EBRAHIMI

of

BURGESS ENGINEERING & TESTING, INC.

HAS SUCCESSFULLY COMPLETED THE TROXLER ELECTRONIC LABORATORIES, INC. TRAINING COURSE FOR THE USE OF NUCLEAR TESTING EQUIPMENT.

SUBJECTS INCLUDED IN THIS COURSE WERE AS FOLLOWS:

Radiological Safety

1. *Principles and practices of radiation protection.*
2. *Leak testing procedures.*
3. *Mathematics and calculations basic to the use and measurement of radioactivity.*
4. *Biological effects of radiation.*
5. *Radioactivity measurement standardization and monitoring techniques and instruments.*
6. *Accident and incident procedures.*
7. *Procedures for nuclear gauge storage and transportation.*
8. *General safety precautions.*

Gauge Operation

1. *Instrument theory*
2. *Operating procedures*
3. *Maintenance*
4. *Field application*
5. *Gauge calibration*

CERTIFICATE #: 071958

Stewart Spraggins

STEWART SPRAGGINS
INSTRUCTOR

03-07-96
DATE

WILLIAM F. TROXLER
PRESIDENT

THIS DOCUMENT MAY BE USED TO VERIFY TRAINING REQUIRED BY 49CFR172, SUBPART H.

ALI H. EBRAHIMI

NAME

03-07-96

TRAINING DATE

Training materials used are part of the Troxler Electronic Laboratories, Inc. Nuclear Gauge Safety Training Program. Topics covered apply to recognition, labeling, preparation for transport, transportation, regulatory compliance, emergency response, personal protection, and accident avoidance only as they apply to radioactive White I and Yellow II portable gauging devices.

TROXLER ELECTRONIC LABORATORIES, INC.
3008 CORNWALLIS ROAD
P.O. BOX 12057
RESEARCH TRIANGLE PARK, NC 27709

Stewart Spraggins
INSTRUCTOR

I hereby certify that the above named employee has been properly trained and tested in accordance with the requirements of 49CFR172,subpart H.

A. H. Ebrahimi

COMPANY OFFICIAL

03-07-98

EXPIRATION DATE

2603 N. Shields BLVD.
Moore, OK 73160

COMPANY AND ADDRESS

TROXLER

Certificate of Completion

Health and Environmental Technology Center

(formerly Oklahoma Asbestos / Safety Training Center)
a service of Moore-Norman Area Vocational Technical Center
600 West Rock Creek Road, Norman, OK 73069 (405) 364-5763 ext. 337

This is to certify that

ALI H. EBRAHIMI

has completed the

HAZARDOUS WASTE OPERATIONS EMERGENCY RESPONSE
"HAZWOPER"

Initial 40 Hour Training Course
In Accordance with OSHA Regulation 29CFR1910.120 (e)
931100

and has passed all applicable written and practical examinations

Superintendent

Assistant Superintendent

Program Coordinator

COURSE DATES: August 22-26, 1994

8. TRAINING PROVIDED TO OTHER USERS

Individuals that will operate the nuclear density gauges will complete the Troxler Electronic Laboratories, Inc. Or other NRC approved nuclear training course, read and understand our safety procedures; and be approved by the RSO.

Refresher training will be conducted annually by RSO in the following areas:

1. Operation and emergency procedures.

2. "DRY RUNS" of operation and emergency procedures.

3. Review of DOT requirements and deficiencies identified during the performance of annual audits of the radiation safety programs.

4. Review of NRC, DOT, EPA and other agencies's notices, bulletins and articles.

The refresher course will be four (4) hours and the records of the course will be maintained for three (3) years. Copies of each individual's training certificate instructors qualifications, RSO review and refresher training report will b maintained on file for a period of three (3) years. Refresher training report will include date, instructor, attendee and topics discussed.

9. FACILITIES AND EQUIPMENT

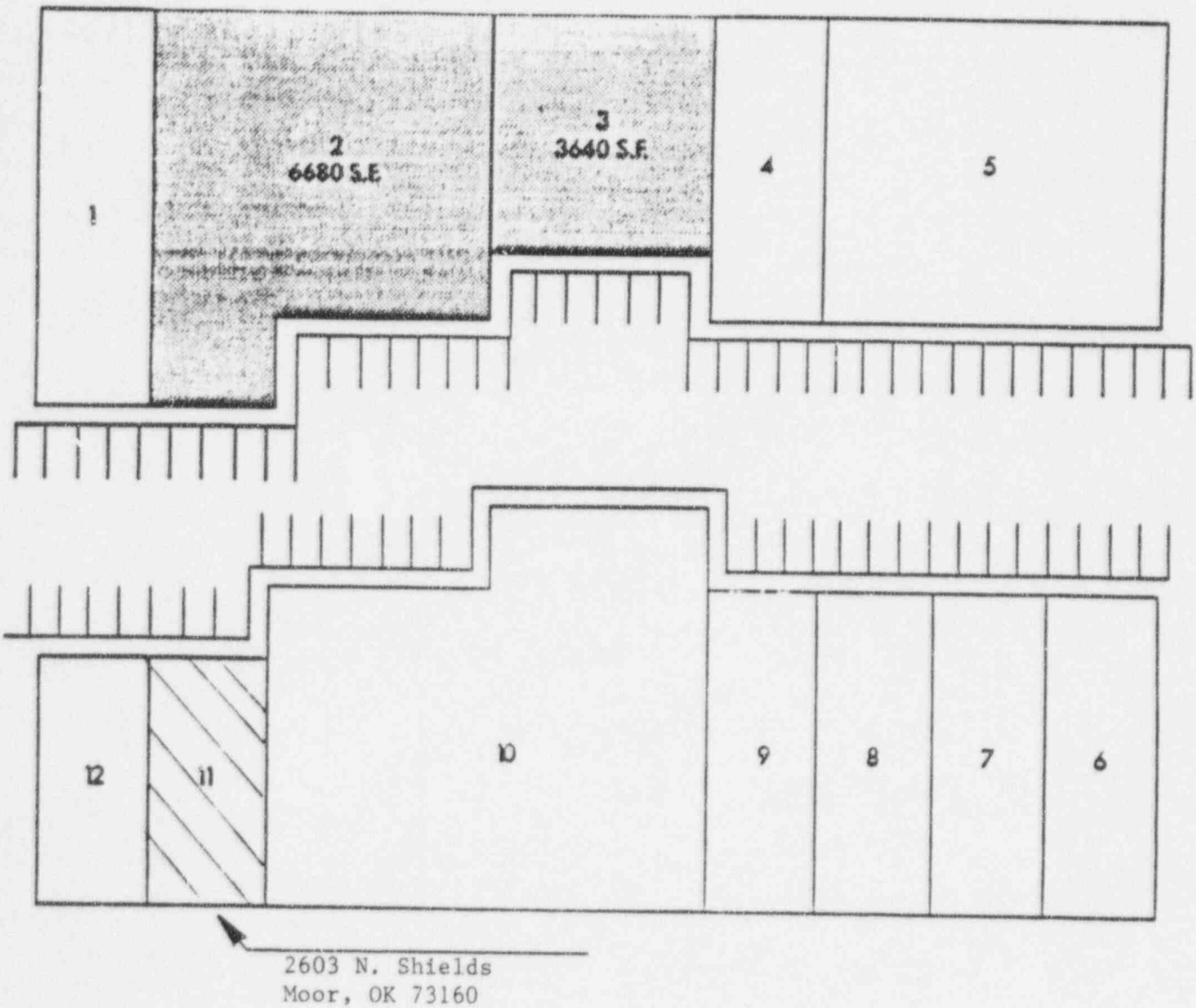
The permanent storage facility is an existing industrial building located at:

2603 N. SHIELD Blvd.
Moor, Oklahoma, 73160

Attached is a sketch of the facility; The building is a prefabricated concrete tilt-up panels walls with concrete floor slab and modified fire resistance roof. The walls separating our facility form the adjacent facilities are sheet rock with insulation. The area adjacent to the nuclear density gauge storage closet in the next building is used as a break room and there are no work station with in fifteen (15) feet radius of the storage close. At regular intervals inquires will be made to insure that there are no work station with in ten (10) to fifteen feet radius of the storage closet. If any work stations are placed with in the fifteen (15) feet radius appropriate actions such as constructing a six (6) inch concrete wall or lead shielding of the storage closet or any other action as directed by the NRC shall be taken. The door to the storage closet shall be kept locked at all times, and properly labeled with "**CAUTION RADIOACTIVE MATERIAL**".

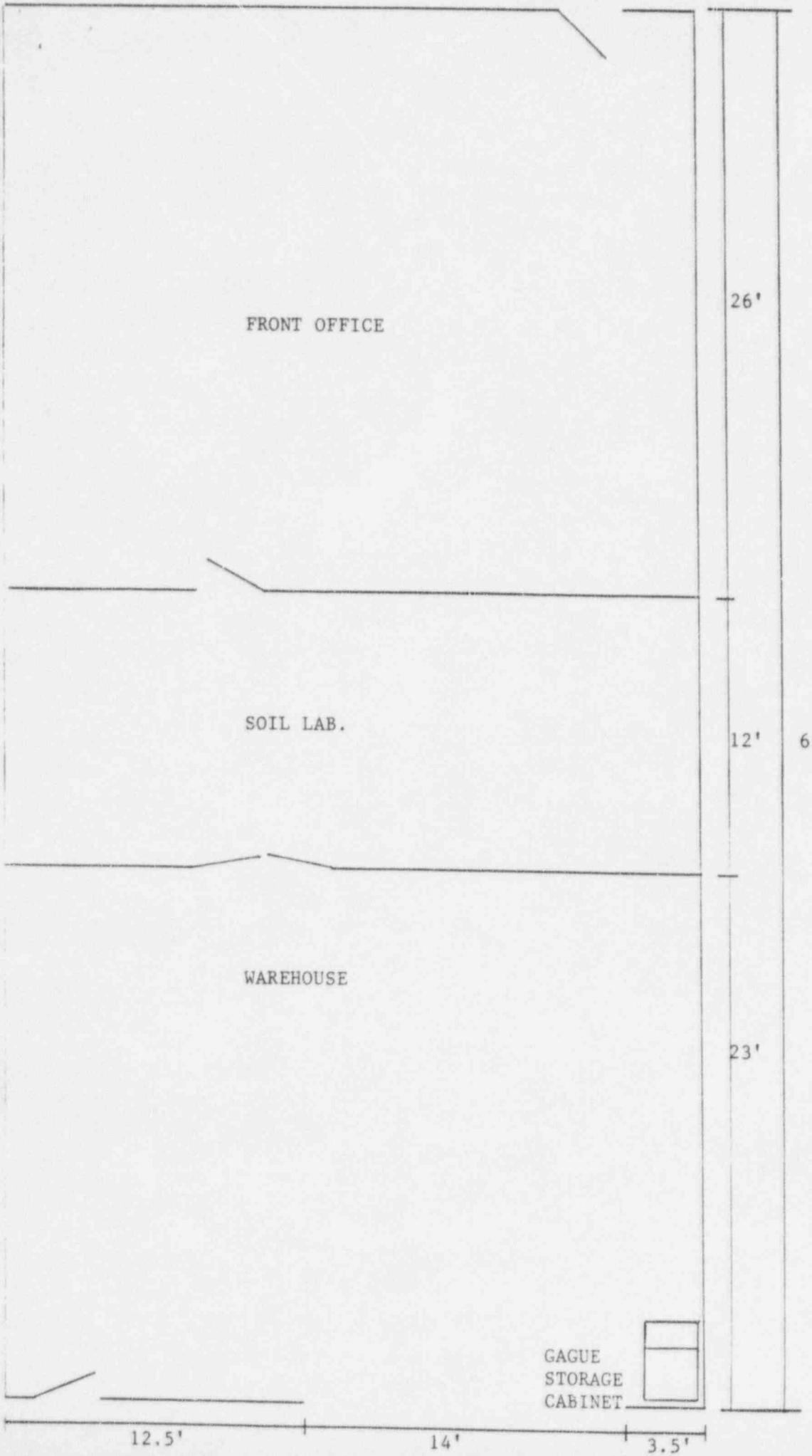
Gauges will be locked in safe position when stored at the permanent storage facility and at temporary job sites. Permanent and temporary storage areas will be locked when unattended. A utilization log (see attached Utilization Log) will be maintained at the permanent storage facility and temporary job sites indicating storage-removal date, authorized user (removal), job site/location of use, storage returned date and authorized user (return).

All possible means will be provided to ensure that equipment is fully secured in transporting vehicle and the equipment is away from passenger compartment. When transporting in an enclosed vehicle (car or van), the vehicle will be locked. When transporting in an open bed vehicle, the equipment will be fastened and locked to the bed. In any situation, the case will be secured to avoid



2603 N. Shields
Moor, OK 73160

(NOT TO SCALE)



2603 N. SHIELDS
MOORE, OK 73160

GAUGE CHECKOUT LOG

Manufacturer: _____ Model: _____

Serial Number: _____ Radio nuclide: _____

Source Activity: _____

DATE REMOVED FROM STORAGE	GAUGE SIGNED-OUT BY (NAME)	LOCATION OF USE	DATE RETURNED TO STORAGE	GAUGE RETURNED BY (NAME)

shifting. When the equipment is secured in vehicle and the vehicle is unattended, it will be locked. The gauge will always be transported in an NRC, and DOT properly labeled, approve case.

The operator, at all time, shall have a completed Bill of Lading and Emergency Response for each equipment.

When the equipment is in the field, the authorized user will wear dosemeter and maintain control over the equipment at all tiles. The equipment will never be left unattended. Unauthorized users will be kept away from active equipment use area. Equipment will only be used for intended purpose. Before the source handle is released, base will be coupled to measure surface. Source will never be touched. Source will be returned to safe position following measurement. For extended periods of non-use, the source handle will be locked, equipment will be returned to transport case, and transport case will be secured in transportation vehicle as described above or returned to its permanent storage area as soon as possible.

TRANSPORTATION OF EQUIPMENT

All possible means will be provided to ensure that equipment is fully secured in transporting vehicle and the equipment is away from passenger compartment. When transporting in an enclosed vehicle (car or van), the vehicle will be locked. When transporting in an open bed vehicle, the equipment will be fastened and locked to the bed. In any situation, the case will be secured to avoid shifting. When the equipment is secured in vehicle and the vehicle is unattended, it will be locked. The gauge will always be transported in the manufacturer case that is approved by NRC and DOT properly labeled. The operator will have a properly completed Bill of Lading and Emergency Response for each equipment.

All equipment users will be trained by RSO every other year in accordance with the US DOT requirement, **49CFR172,H**. Current US DOT regulations will be maintained and complied with.

OPERATION AND EMERGENCY RESPONSE

Operation and emergency responses that will be implemented by Burgess Engineering and Testing, INC. Are presented in the following pages. All equipment users will be provided with a copy of the Operation and Emergency Response before operating any equipment. Copies of the Operation and Emergency Response will be maintained at each job site. Common surface measurement will require sealed source rod to be lowered to a depth of less the three (3) feet.

10. RADIATION SAFETY PROGRAM

PERSONAL MONITORING PROGRAM

Burgess Engineering and Testing, Inc. is committed to monitor all gauge users with a TLD when they are using the gauges. The TLD monitoring equipment will be supplied by an accredited National Voluntary Laboratory Accreditation Program (NVLAP), as required by **10CFR 20.1501**. Type of monitoring equipment shall be:

Thermoluminescent Dosimeter (TLD)
Beta, Gamma, X-Ray, and Neutron Measurement.

Exchange frequency shall be quarterly

When using gauges, the authorized users will wear the personal monitoring devices that has been assigned to them. When not in use the personnel monitoring devices shall be stored in a designated radiation free area. **DOSEMETER SHALL NOT BE STORED WITH GAUGES OR IN GAUGES STORAGE AREA**.

SURVEY METER

Burgess Engineering and Testing, Inc. shall procure a radiation survey meter with measuring capability of 0.01 to 100 mR/hr. The survey meter shall be calibrated annually by the manufacturer. The survey meter shall be used to perform a survey following an incident.

LEAK TESTING

Supplier/Analysis: Troxler Electronic Labs., Inc.
3008 Cornwallis Rd.
P.O. Box 12057
Research Triangle Park, NC 27709

North Carolina License No.: 032-0182-1

Each equipment shall be leak tested by the RSO at interval not exceeding 6-months. The

leak test will be performed with the TROXLER model 3880 leak test using the manufacturer instructions. Personnel Monitoring devices will be worn while equipment is leak tested. Collected leak test will be sent to TROXLER for analysis. TROXLER will furnish the result of the leak test and will contact Burgess Engineering and Testing, Inc. if analysis shows that removable activity is greater than).005 Micro Curries (0.185 Mbq). If the leak test result is greater than the aforementioned limit, the equipment shall immediately be removed from active service by RSO and handled under advisement of TROXLER.

INVENTORIES

The RSO will conduct an inventory when conducting the leak test (not exceeding six (6) months), to account for all sealed sources and devices received and possessed under the license by Burgess Engineering and Testing, Inc. inventory records shall include the following:

1. Radio nuclide and activity (millicurries and Mbq) of each sealed source.
2. Manufacturers name(s), Model number(s) and serial number of each device(s).
3. Location of device(s) and date of inventory.

MAINTENANCE

Burgess Engineering and Testing, Inc. or its employees shall not perform any maintenance which involves the removal of the sealed source. For maintenance procedure which includes the removal of the sealed source the device shall be returned to the manufacturer service department. Routine maintenance and periodic cleaning of the gauges (**NOT INCLUDING THE REMOVAL OF THE SEALED SOURCE**) will be performed in accordance with the manufacturer instructions. During maintenance, the authorized person performing the maintenance will wear their personal monitoring device and follow the manufacturer's instruction.

TRANSPORTATION OF EQUIPMENT

All possible means will be provided to ensure that equipment is fully secured in transporting vehicle and the equipment is away from passenger compartment. When transporting in an enclosed vehicle (car or van), the vehicle will be locked. When transporting in an open bed vehicle, the equipment will be fastened and locked to the bed. In any situation, the case will be secured to avoid shifting. When the equipment is secured in vehicle and the vehicle is unattended, it will be locked. The gauge will always be transported in the manufacturer case that is approved by NRC and DOT properly labeled. The operator will have a properly completed Bill of Lading and Emergency Response for each equipment.

All equipment users will be trained by RSO every other year in accordance with the US DOT requirements, **49 CFR 172.H**, current US DOT regulations will be maintained and complied with.

OPERATING AND EMERGENCY PROCEDURES

Operating and Emergency Response that will be implements by Burgess Engineering and Testing, Inc. are presented in the following pages. A copy of the Operating and Emergency Response will be provided to each equipment user before operating any equipment. Copies of the Operating and Emergency Response will be maintained at each job site. Common surface measurement will require sealed source to be lowered to depths of less than three (3) feet.

OPERATING AND EMERGENCY PROCEDURES

Licensee: Burgess Engineering and Testing, Inc.
1819 Bowling Green
Norman, Oklahoma 73071

Radiation Safety Officer: Ali Honarmand-Ebrahimi
(405)790-0488

OPERATING PROCEDURES

Removal From Storage

1. Ensure that your dosimeter is attached to your front torso
2. Unlocked storage area, sign equipment out on log sheet (date, name, job site)
3. Check that the sealed source hand is locked and serial no. matches log
4. Place equipment in properly transport case and lock case
5. Lock storage area
6. Secure gage in cargo area of vehicle with cable or chain
7. Brace or block case to prevent shifting
8. Lock the vehicle, when equipment is in vehicle
9. Secure Bill of Lading and Emergency Response and place these two document on front seat

Field Use

1. Ensure that your dosimeter is attached to your front torso
2. Maintain control over the equipment at all time
3. Keep unauthorized person from active equipment use area
4. Use equipment only for its intended purpose
5. Ensure base of equipment is coupled to measurement surface before releasing source handle
6. Never touch the sealed source
7. Return source handle to safe position after measurement
8. Never leave equipment unattended
9. For extended periods of non-use lock source handle, return equipment to transport and lock in vehicle

Return To Storage

1. Ensure that your dosimeter is attached to your front torso
2. Unlock storage area
3. Place equipment in storage area and ensure source handle is locked
4. Sign equipment in (name, date) and check the serial no. match
5. Lock storage area
6. Return your dosimeter to its designated storage or store in a radiation free area. DO NOT STORE YOUR DOSIMETER WITH THE EQUIPMENT OR IN STORAGE AREA.

MAINTAIN ALARA - (AS LOW AS REASONABLY ACHIEVABLE)

OPERATING AND EMERGENCY PROCEDURES

Licensee: Burgess Engineering and Testing, Inc.
1819 Bowling Green
Norman, Oklahoma 73071

Radiation Safety Officer: Ali Honarmand-Ebrahimi
(405)790-0488

EMERGENCY PROCEDURES

In the event of physical damage to an equipment, the following steps will be taken:

1. Locate the source(s)

2. A fifteen (15) feet radius area from the equipment must be sealed or cordoned off to prevent entry by unauthorized persons

3. If a vehicle is involved, it must not be moved until the extended of the contamination (if any) of the vehicle is determined

4. Make a visual inspection of the source hosing or shield has been sustained

5. As soon as possible, after the situation has been stabilized and is under control, notify Ali Honarmand-Ebrahimi) at (405)790-0488. Describe the existing conditions and follow the instructions of RSO

In the event that an equipment is lost or stolen, the RSO listed above is to be notified **IMMEDIATELY**

MAINTAIN ALARA - (AS LOW AS REASONABLY ACHIEVABLE)

ANNUAL AUDIT

The RSO will conduct an audit of the radiation safety program at intervals not to exceed 12 months. The qualifications of the RSO are presented in ITEM 7. The scope and extent of audit will be conducted in accordance with APPENDIX I of pages 2-07 (sept. 1994). Deficiencies discovered during the audit will be corrected. Corrective procedures shall be implemented and discussed with the gauges users. Records of audits will be maintained for a period of three (3) years.

FINANCIAL ASSURANCE AND RECORD KEEPING FOR DECOMMISSION

The RSO will ensure that the quantities of source materials do not exceed the limits the would require financial assurance for decommissioning as noted in **10 CFR 30.35**. Record relevant to decommissioning will be maintained permanently and will include information related to spills, leaking sources, or unusual incidents that involve the spread of contamination.

11. WASTE MANAGEMENT

Disposition of the equipment will be transferred to either another licensee specifically licensed to possess the radioactive material or to a licenced disposal facility.