

MATERIALS LICENSE

ORC

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, 36, 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		3. License Number	50-29110-01
1. USKH, Inc.			
2. 2515 A Street Anchorage, Alaska 99503		4. Expiration Date	May 31, 2007
		5. Docket or Reference No.	030-34445

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. and B. To be used, for measurement purposes, in compatible portable 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.

180278



**MATERIALS LICENSE
SUPPLEMENTARY SHEET**

License Number

50-29110-01

Docket or Reference Number

030-34445

CONDITIONS

10. Licensed material may be used at the licensee's facilities located at 2515 A Street, Anchorage, Alaska 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. The licensee may not possess and use materials authorized in Items 6, 7, and 8, until:
 - A. the licensee has constructed the facilities and obtained the equipment described in the application and supporting documentation; and
 - B. the licensee has notified the U.S. Nuclear Regulatory Commission, Region IV, ATTN: Director, Division of Nuclear Materials Safety, 611 Ryan Plaza Drive, Suite 400, Arlington, Texas, 76011, that the activities authorized by the license will be initiated.
12. In accordance with the requirements set forth in 10 CFR 30.36(b), the licensee shall notify the U.S. Nuclear Regulatory Commission, Region IV, ATTN: Director, Division of Nuclear Materials Safety, 611 Ryan Plaza Drive, Suite 400, Arlington, Texas, 76011, in writing, of a decision not to complete the facility, acquire equipment, or possess and use authorized material.
13.
 - A. Licensed material shall only be used by, or under the supervision and in the physical presence of, William Mendenhall 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 William Mendenhall.
14.
 - 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.
 - 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.

**MATERIALS LICENSE
SUPPLEMENTARY SHEET**

License Number

50-29110-01

Docket or Reference Number

030-34445

- 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
 - (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 Laboratories, 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.
15. Sealed sources or detector cells containing licensed material shall not be opened or sources removed from source holders by the licensee.
16. The licensee shall conduct a physical inventory every 6 months to account for all sources and/or devices received and possessed under the license.
17. 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.

**MATERIALS LICENSE
SUPPLEMENTARY SHEET**

License Number

50-29110-01

Docket or Reference Number

030-34445

18. 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.
19. 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.
20. 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."
21. The licensee shall not use sealed sources or probes containing sealed sources at depths exceeding 3 feet below the surface.
22. 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.
23. 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 April 14, 1997
 - B. Letter dated May 15, 1997
 - C. Letter dated May 16, 1997

FOR THE U.S. NUCLEAR REGULATORY COMMISSION

Date MAY 16 1997

By Beth A. Prange

Materials Branch
Region IV, WCFO
Walnut Creek, California 94596

MS/D

BETWEEN:

License Fee Management Branch, ARM
and
Regional Licensing Sections

(FOR LFMS USE)
INFORMATION FROM LTS

Program Code: _____
Status Code: 2 _____
Fee Category: _____
Exp. Date: 0 _____
Fee Comments: _____
Decom Fin Assur Req'd: _____

RECEIVED
NRC
RIV WCFO

97 APR 29 PM 12:12

1997 APR 24 PM 3:44

LICENSE FEE TRANSMITTAL

A. REGION WCFO

1. APPLICATION ATTACHED

Applicant/Licensee: USKH, INC.
Received Date: 970423
Docket No.: 3034445
Control No.: 572491
License No.: _____
Action Type: New Licensee

2. FEE ATTACHED

Amount: \$550.00
Check No.: 067759

3. COMMENTS

Signed
Date

John Garcia
4-23-97

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

Rita Snapsier
4/25/97

Log	<u>Apr 2 WCFO</u>
Remitter	<u>067759</u>
Check No.	<u>067759</u>
Amount	<u>\$550</u>
Fee Category	<u>3P</u>
Type of Fee	<u>Appl</u>
Date Check Rec'd.	<u>4/25/97</u>
Date Completed	<u>4/25/97</u>
By:	<u>Rem</u>



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION IV

Walnut Creek Field Office
1450 Maria Lane
Walnut Creek, California 94596-5368

MAY 16 1997

USKH, Inc.
ATTN: Theodore R. Kruth
Vice President
2515 A Street
Anchorage, Alaska 99503

SUBJECT: NEW LICENSE

Please find enclosed License No. 50-29110-01. 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 (510) 975-0250.

It should be noted that an NRC Form 531, "Request for Taxpayer Identification Number" is enclosed with this letter. You should complete the form and mail it to the Office of the Controller, as requested.

Note that Condition 11. restricts you from possessing and using byproduct materials identified in Items 6, 7, and 8 until construction of the facility identified in the application has been completed. When the facility has been completed and before possession of any specifically licensed byproduct material, you must notify the Commission in writing. When notified, the licensing staff will issue a "fee exempt" amendment to authorize the possession and use of materials identified in Items 6, 7, and 8 of the license.

Condition 12. requires, that should you decide not to complete the facility identified in your application and elect not to possess and use material identified in Items 6, 7, and 8, you must **promptly** notify the Commission in writing of this decision.

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.

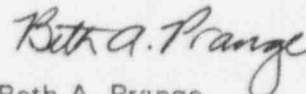
7. Submit a complete renewal application with proper fee, or termination request at least 30 days before the expiration date on your license. You will receive a reminder notice approximately 90 days before the expiration date. Possession of radioactive material after your license expires is a violation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

Also enclosed, please find the NRC letter dated July 12, 1995, to all materials licensees which transmits the NRC Policy on Communications Between the NRC and Licensees. It is the intent of this policy to foster greater openness and candid communications and to improve interactions with our licensees. We encourage you and your staff to become familiar with these principles so that we can maintain a high level of professional communication at all levels in our organizations.

Thank you for your cooperation.

Sincerely,



Beth A. Prange
Sr. Health Physicist (Licensing)
Materials Branch

Docket: 030-34445
License: 50-29110-01
Control: 572491

Enclosures: As stated

USKH, Inc.

-4-

bcc:

Docket File
WCFO Inspection File
LFARB, T-9 E10
State of AK (License Only)

DOCUMENT NAME: G:\beth\572491

To receive copy of document, indicate in box: "C" = Copy without enclosures "E" = Copy with enclosures "N" = No copy

RIV:MB	N	C:MB						
BPrange	BAP	Fwenslawski						
05/16/97	05/ /97	05/ /97	05/ /97	05/ /97				

OFFICIAL RECORD COPY

UNWIN SCHLUBEN KORYNTA HUETTL, INC.

ARCHITECTURE • ENGINEERING • LAND SURVEYING • PLANNING



May 16, 1997

PRINCIPALS

Leo von Schubert, P.E., L.S.
 Earl D. Korynta, P.E.
 James A. Huettl, AIA
 Gary H. Pohl, AIA
 Edwin H. Riggs, P.E.
 Theodore R. Kruth, P.E.
 Monte R. Goritzke, L.S.
 Kenneth D. Maynard, FAIA, CCS

ASSOCIATES

Donna L. Marks
 Timothy J. Vig, P.E.
 Daryl D. Sorenson, AIA
 Steven M. Tjaden
 James R. Kinney, P.E.
 Gregory A. Ingham, CPA
 Scott V. Bell, P.E.
 Bruce E. Hopper, P.E.
 Gary R. Kuhn, P.E.
 John M. Stadum, RIE
 Zane W. Shandlin, P.E.
 Howard C. Holtan, P.E., L.S.
 William H. Mendenhall, P.E.
 Howard A. Partch, AIA

Beth Prange, Sr. Health Physicist
 U.S. Nuclear Regulatory Commission, Region IV
 Walnut Creek Field Office
 1450 Maria Lane
 Walnut Creek, CA 94596-5368

Subject: NRC Licensing Application; Control No. 572491

Dear Ms. Prange:

This is a response to your May 15, 1997 call regarding the survey meter USKH intends to purchase. I believe the addition below covers the item that you needed clarified.

ITEM 10 RADIATION SAFETY PROGRAM

Add the following paragraphs under Section 10.2, Radiation Detection Instruments:

USKH will have at least one survey meter capable of measuring between 0 to 100 mRem/hr. This instrument will be used to perform surveys in the event of an incident. The factory will annually calibrate the meter. Prior to use in the field, the meter will be checked according to the manufacturer's instructions. If the meter fails to properly respond to checks, it will be sent to the manufacturer for repair.

The survey meter will be a GM survey meter manufacture by Troxler. The meter, a Troxalert, is part number 104262.0001. It can detect alpha, beta, gamma, and x-ray radiation.

I hope that this change is sufficient for you to continue with our application review. Should you have any questions, please feel free to call me at 907-276-4245. Thank you for your assistance with this matter.

OFFICES

2515 A Street
 Anchorage, Alaska 99503
 Phone (907) 276-4245
 FAX (907) 266-4653

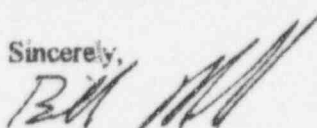
1630 Second Avenue
 Fairbanks, Alaska 99701
 Phone (907) 452-2126
 FAX (907) 452-4225

3017 Clirion Drive, Ste. 201
 Juneau, Alaska 99801
 Phone (907) 790-2901
 FAX (907) 790-3901

809 S. Chugach Street, Ste. 1
 Palmer, Alaska 99645
 Phone (907) 746-7815
 FAX (907) 746-7819

<http://www.uskh.com>

Sincerely,


 Bill Mendenhall, P.E.
 Senior Engineer

WHM\whm\PAHOME\EVERYONE\BILL\METER.WPD

Attachments

USKH Work Order #000000

Copy to: File

572491

UNWIN SCHEBEN KORYNTA HUETTL, INC.

ARCHITECTURE • ENGINEERING • LAND SURVEYING • PLANNING



FACSIMILE TRANSMITTAL

TO: Both Prange DATE 5/16/97
COMPANY U.S. NRC SUBJ NRC Control 572491
DEPT. Motor clarification
FAX NO: 510-775-0381 WO # 0000

NO. OF PAGES (including this transmittal): 2

If all pages not received
please notify sender.

ORIGINAL:

☐ KEPT IN OFFICE☒ TO FOLLOW VIA:☒ Regular Mail☐ Courier☐ Overnight ServiceBothPlease call if you have any questionsSIGNED Bill

Department _____

☐ 2515 A Street • Anchorage, Alaska 99503
Phone (907) 276-4245 • Fax (907) 258-4653

☐ 1830 Second Avenue • Fairbanks, Alaska 99701
Phone (907) 452-2128 • Fax (907) 452-4225

☐ 9097 Glacier Hwy, Ste. 201 • Juneau, Alaska 99801
Phone (907) 790-2901 • Fax (907) 790-3901

☐ 800 W. Evergreen St., Ste. 218 • Palmer, Alaska 99645
Phone (907) 746-7815 • Fax (907) 746-7819

572491

UNWIN SCHEEN KORYNTA HUETTL INC.

ARCHITECTURE • ENGINEERING • LAND SURVEYING • PLANNING



FACSIMILE TRANSMITTAL

TO: Beth Prange DATE 5/15/97
COMPANY U.S. NRC SUBJ License Application
DEPT. Materials Branch Revisions
FAX NO. 510-975-0381 WO# 0000

NO. OF PAGES (including this transmittal): 4If all pages not received
please notify sender.

ORIGINAL:

☐ KEPT IN OFFICE☒ TO FOLLOW VIA:☒ Regular Mail☐ Courier☐ Overnight ServiceBeth

Attached are the revisions requested in your
fax. Please call me at 907-276-4245
if you have any questions

SIGNED Bill [Signature]

Department _____

☐ 2515 A Street • Anchorage, Alaska 99503
Phone (907) 276-4245 • Fax (907) 258-4653☐ 1830 Second Avenue • Fairbanks, Alaska 99701
Phone (907) 452-2128 • Fax (907) 452-4225☐ 9097 Glacier Hwy, Ste. 201 • Juneau, Alaska 99801
Phone (907) 790-2801 • Fax (907) 780-3901☐ 800 W. Evergreen St., Ste. 218 • Palmer, Alaska 99645
Phone (907) 746-7815 • Fax (907) 746-7819

LINWIN SCHREIN KORYNTA HUETT, INC.

ARCHITECTURE • ENGINEERING • LAND SURVEYING • PLANNING



PRINCIPALS

Leo von Schoben, P.F., L.J.
 Earl D. Korynta, P.E.
 James A. Huett, AIA
 Gary H. Pohl, AIA
 Edwin H. Riggs, P.E.
 Theodore R. Kruth, P.E.
 Monte R. Gantzke, L.S.
 Kenneth D. Maynard, F.AIA, CCS

ASSOCIATES

Dorina L. Marks
 Timothy J. Vig, P.E.
 Daryl D. Sorenson, AIA
 Steven M. Tjaden
 James R. Kinney, P.E.
 Gregory A. Ingham, CPA
 Scott V. Beil, P.F.
 Bruce E. Hopper, P.E.
 Gary R. Kuhn, P.E.
 John M. Stadum, IRIE
 Zane W. Shanklin, F.E.
 Howard C. Holtan, P.F., L.S.
 William H. Mendenhall, P.E.
 Howard A. Parich, AIA

May 15, 1997

Beth Prange, Sr. Health Physicist
 U.S. Nuclear Regulatory Commission, Region IV
 Walnut Creek Field Office
 1450 Maria Lane
 Walnut Creek, CA 94596-5368

Subject: NRC Licensing Application; Control No. 572491

Dear Ms. Prange:

This is a response to your May 14, 1997 fax regarding revisions to USKH's NRC license application. I believe in the additions below cover the items that you needed clarified.

1. ITEM 7: INDIVIDUALS RESPONSIBLE FOR THE RADIATIONS
 SAFETY PROGRAM AND THEIR EXPERIENCE

Add the following paragraph at the end of the section:

4. Management Commitment

The management and owners of USKH are committed to the safety of its employees and the public. We will carefully monitor the use of the instrument and the operators to help assure that safety is not compromised. Management will immediately take actions to stop any unsafe operations if they are observed or reported.

2. ITEM 8: TRAINING FOR INDIVIDUALS WORKING IN OR
 FREQUENTING RESTRICTED AREAS

Add the following section at the end of the section:

3. Record Keeping

USKH will maintain all related training records for a minimum of three years.

OFFICES

2515 A Street
 Anchorage, Alaska 99503
 Phone (907) 276-4245
 FAX (907) 258-4663

1830 Second Avenue
 Fairbanks, Alaska 99701
 Phone (907) 452-2128
 FAX (907) 452-4225

3017 Clinton Drive, Ste. 201
 Juneau, Alaska 99801
 Phone (907) 790-2901
 FAX (907) 790-3901

809 S. Chugach Street, Ste. 1
 Palmer, Alaska 99645
 Phone (907) 746-1815
 FAX (907) 746-7819

<http://www.uskh.com>

572491

UNWIN SCHEBEN KORYNTA HUETTL, INC.

ARCHITECTURE • ENGINEERING • LAND SURVEYING • PLANNING

Beth Prange, Sr. Health Physicist
U.S.N.R.C. - Region IV
Page 2

3 & 4. ITEM 9: FACILITIES AND EQUIPMENT

Please see the attached drawing.

Add the following sentence at the end of the page:

8. Keys will only be issued to the RSO and other authorized individuals.

5 & 6 ITEM 10 RADIATION SAFETY PROGRAM

Delete the paragraph under Section 10.2, Radiation Detection Instruments, and insert the following paragraph:

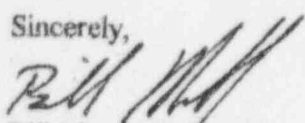
USKH will own and maintain a survey meter. This meter will be stored at USKH's Anchorage office in the same area as the Troxler gauge storage area. This meter will be available to all authorized users should there be a breach in the shielding.

Revise Section 10.3, Leak Testing, as follows:

Change *model #102868* to *model 3880, part number #102868*.

I hope that these changes are sufficient for you to continue with our application review. Should you have any questions, please feel free to call me at 907-276-4245. Thank you for your assistance with this matter.

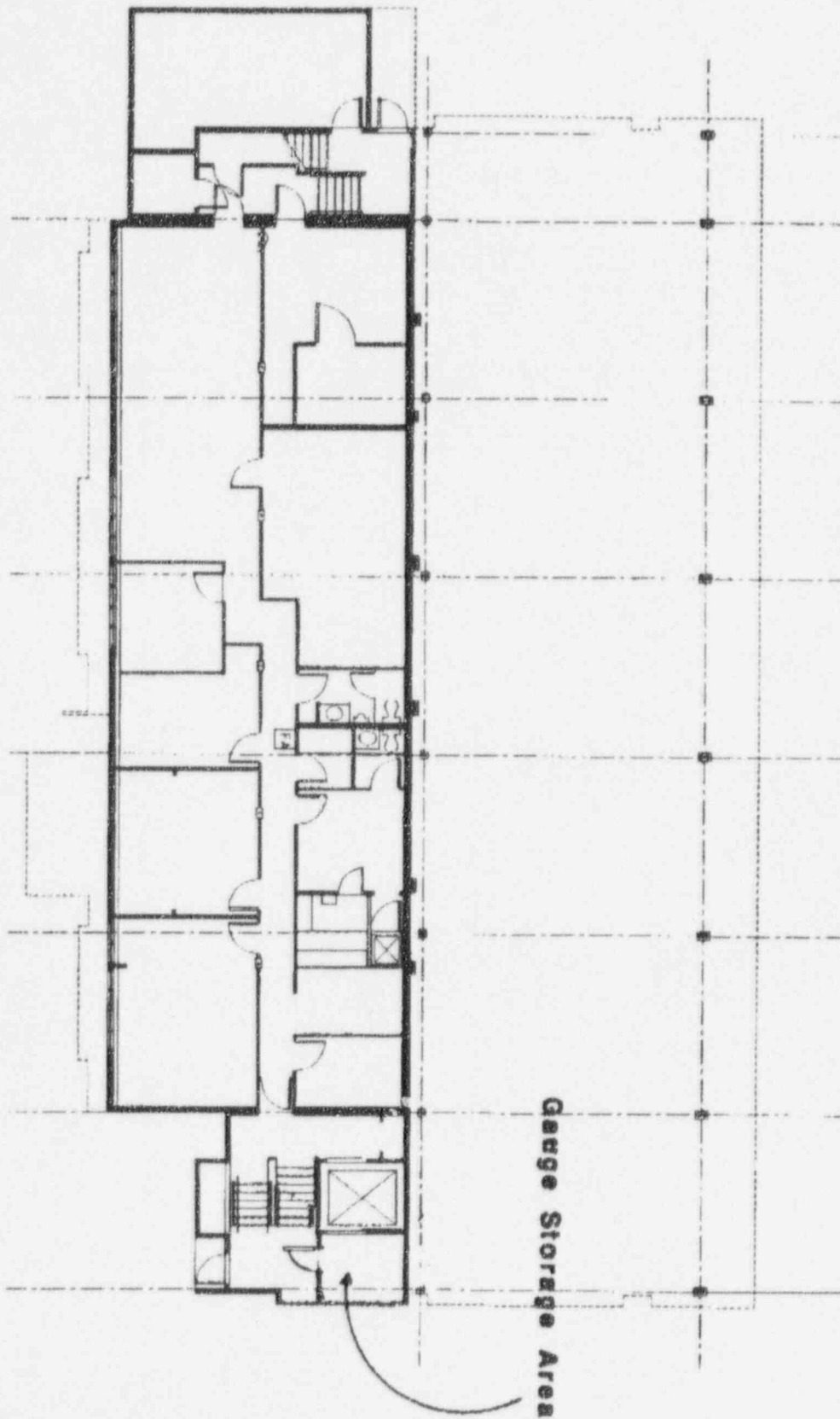
Sincerely,


Bill Mendenhall, P.E.
Senior Engineer

WHM\whm\F\HOME\EVERYONE\BILL\NRC.001

Attachments
USKH Work Order #000000

Copy to: File



USKH OFFICE BUILDING PROJECT	USKH ARCHITECTURE	USKH: SCHWAB, NORTON, PETER 2015 & 2000 BIRMINGHAM, AL 35203 210-4700	ENGINEER LING, JINSHENG	DATE 5/15/97	DRAWN BY J. LING	CHECKED BY J. LING	APPROVED BY J. LING	SCALE 1/8" = 1'-0"	SHEET NO. 4/4
				REVISIONS	REVISIONS	REVISIONS	REVISIONS	REVISIONS	

572491

TELECOPIER TRANSMITTAL

5/14/97

TIME

11:20 a.m.

WARNING: Most facsimile machines produce copies on thermal paper. The image produced is highly unstable and will deteriorate significantly in a few years. Reproduce copies onto plain paper prior to filing as a record.

TO

NAME

William Mendenhall

TELEPHONE

(907) 276-4245

NAME AND LOCATION OF COMPANY (if other than NRC)

USKH, Inc.

TELECOPY NUMBER

(907) 258-4653

VERIFICATION NUMBER

FROM

NAME

Beth Prange

Fax: (510) 975-0381

TELEPHONE

(510) 975-0250

MAIL STOP

RIV; WFO

TELECOPY DATA

NUMBER OF PAGES

THIS PAGE + 1 PAGES = 2 TOTAL

PRIORITY

IMMEDIATE

OTHER
(Specify)

SPECIAL INSTRUCTIONS

I reviewed your application and called you. I understand that you were out of the office + will return 5/15/97. The items needed are attached. If you have questions, please call. Please fax a reply (then mail the original).

Thanks.

PROBLEMS

If any problems occur or if you do not receive all the pages, call:

TELEPHONE

PROCESSED BY (INITIALS)

DISPOSITION OF ORIGINAL

After telecopy has been sent, process the original as requested below. (If none are checked, the original will be discarded.)

RETURN TO SENDER

CALL AND SENDER WILL PICK UP

DISCARD

VERIFIED BY (INITIALS)

Confirmed receipt 11:25 am 5/14/97.

1. A commitment is needed from management that the RSO is authorized to stop any unsafe operation.
2. A commitment is needed that authorized user training records will be maintained for three years.
3. Although the application stated that a sketch of the gauge storage room was enclosed, it was not attached to our copy. Please submit this sketch.
4. Commit to issuing keys to the gauge storage area only to authorized users.
5. There is a typographical error in 10.2 of the application. Also, there appears to be no clear agreement from Alaska D.O.T. or from Troxler that you could obtain a survey meter from them in an emergency. This section should be rewritten and resubmitted.
6. Although you stated that the leak test kit model would be 102868, the Registry Sheet (NC646D130S) indicates a Model 3880. Please check with the manufacturer and report your findings in your reply.

Please respond in writing so that the review can continue.



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION IV

Walnut Creek Field Office
1450 Maria Lane
Walnut Creek, California 94596-5368

APR 24 1997

USKH, Inc.
ATTN: Theodore R. Kruth
Vice President
2515 A Street
Anchorage, Alaska 99503

SUBJECT: ACKNOWLEDGMENT OF REQUEST FOR LICENSING ACTION

REFERENCE: Application dated April 14, 1997

We have completed the administrative review and initial processing of your application.

Please note that the technical review may identify additional omissions in the submitted information or technical issues that require additional information.

Applications for a new materials license are normally processed within 90 days, unless the technical review identifies:

- Major technical deficiencies
- Policy issues that require input and coordination with other NRC Regional offices, Agreement State offices, or NRC's Office of Nuclear Materials and Safeguards

A copy of your correspondence has been forwarded to our License Fee and Accounts Receivable Branch, Office of the Controller, who will contact you separately if the appropriate license fee has not been submitted for your request, or for billing if your request is subject to full cost recovery.

Any correspondence about this application should reference the Control number listed below.

Sincerely,

Beth A. Prange

Beth A. Prange
Sr. Health Physicist (Licensing)
Materials Branch

Control No. 572491

USKH, Inc.
Anchorage, Alaska

- 2 -

bcc:
Docket File

G:\572491.AKL

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

OFFICE	RIV:WCFC:NMLB	N		N
NAME	J. Garcia		B. Prange	BAP
DATE	4/24/97		4/24/97	

030-34445

29110

New

NRC FORM 313

U. S. NUCLEAR REGULATORY COMMISSION

APPROVED BY OMB: NO. 3150-0120

EXPIRES: 7/31/99

(7-96)

10 CFR 30, 32, 33
34, 35, 36, 39 and 40

APPLICATION FOR MATERIAL LICENSE

57A

Estimated burden per response to comply with this information collection request: 7-hours. Submission 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 (T-6 F33), 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. NRC may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number.

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
801 WARRENVILLE RD.
LISLE, IL 60532-4351

ALASKA, ARIZONA, ARKANSAS, CALIFORNIA, COLORADO, HAWAII, IDAHO, KANSAS,
LOUISIANA, MONTANA, NEBRASKA, NEVADA, NEW MEXICO, NORTH DAKOTA,
OKLAHOMA, OREGON, PACIFIC TRUST TERRITORIES, SOUTH DAKOTA, TEXAS, UTAH,
WASHINGTON, OR WYOMING, SEND APPLICATIONS TO:

NUCLEAR MATERIALS LICENSING SECTION
U.S. NUCLEAR REGULATORY COMMISSION, REGION IV
811 RYAN PLAZA DRIVE, SUITE 400
ARLINGTON, TX 78011-8064

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)

Ted Kruth, P.E.
USKH, Inc.
2515 A Street
Anchorage, AK 99503

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

2515 A Street
Anchorage, AK

4. NAME OF PERSON TO BE CONTACTED ABOUT THIS APPLICATION

Ted Kruth

TELEPHONE NUMBER

907-276-4245

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 I.C.

AMOUNT
ENCLOSED \$ 550.00

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 82 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

THEODORE R. KRUTH, Vice Pres.

SIGNATURE

Theodore R. Kruth

DATE

4/14/97

FOR NRC USE ONLY

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

572491

Attachment for Application for Material License (NRC FORM 313)

ITEM 5: RADIOACTIVE MATERIAL

<u>RADIONUCLIDE</u>	<u>SEALED SOURCE</u>	<u>MAX. ACTIVITY/SOURCE (mCi)</u>
A. Cesium (Cs-137)	Troxler Electronics Labs, 3400 series	10 mCi
B. Americium (Am-241:Be)	Troxler Electronics Labs, 3400 series	50 mCi Am-241:Be
C. Cs-137/Am-241:Be	Combination source for A and B above	10 mCi 50 mCi Am-241:Be

Authorized Use

1. For use in Troxler model 3400 series gauge to measure moisture/density of construction materials
2. For use in Troxler model 3400 series gauge to measure hydrogen content and moisture/density of construction materials
3. For use in Troxler model 3400 series gauge to measure moisture/density of construction materials

Possession Limit Commitment

It is USKH's intent to have only two Troxler 3400 series gauges at anytime. With this number and the amount of activity provided by each gauge allows the company to be below the limits defined in 10 CFR 30.35(d) that require proof financial assurance. The threshold limits are 100,000 Ci of Cs-137 and 100 Ci of Am-241.

Data on Registration Certificate

<u>MANUFACTURER</u>	<u>REGISTRY NO.</u>	<u>MODEL NO.</u>
Troxler Electronic Lab. 3008 Cornwallis Rd. Research Triangle Park, NC 27709.	NC-646-D-130-S	3400 Series

Chemical and/or physical form

The solid source is sealed per Troxler Drawing # A102112/A-102451.

Attachment for Application for Material License (NRC FORM 313)

ITEM 6: PURPOSE FOR WHICH LICENSED MATERIAL WILL BE USED

The device will be used for quality control inspection of soil compaction densities. Additionally, the gauge will be used to detect the presence of moisture in roofing material. Both uses conform with the manufacturer's recommended use.

During routine use of the gauge for soil density measurements, the source will be lowered a maximum of 18-inches into the soil. This depth is within the operating limitations of the gauge.

Attachment for Application for Material License (NRC FORM 313)

ITEM 7: INDIVIDUALS RESPONSIBLE FOR THE RADIATION SAFETY PROGRAM AND THEIR TRAINING EXPERIENCE

1. Proposed RSO:

The proposed Radiation Safety Officer (RSO) will be Mr. William Mendenhall, P.E.

2. Training Requirements of the RSO

Prior to becoming the RSO, Mr. Mendenhall will receive training from an authorized representative of Troxler Electronics Laboratory, the manufacturer of the unit intended for purchase by USKH. Mr. Mendenhall is a registered professional engineer with 15 years of professional experience. Mr. Mendenhall graduated in 1981 with a Bachelors of Science in Civil Engineering from an accredited engineering school.

Mr. Steve Tucker of Troxler Electronic Laboratories will conduct the training course. The proposed course date is scheduled for May 14, 1997 in Anchorage, Alaska. Mr. Tucker indicates the course criteria of his Nuclear Gauge Safety Training course meets the criteria listed in Part 1 of Appendix D of the *Draft Regulatory Guide DG-6008*. Mr. Tucker's qualifications meet the criteria of Part II of Appendix D of *DG-0008*.

3. Duties and Responsibilities of the RSO

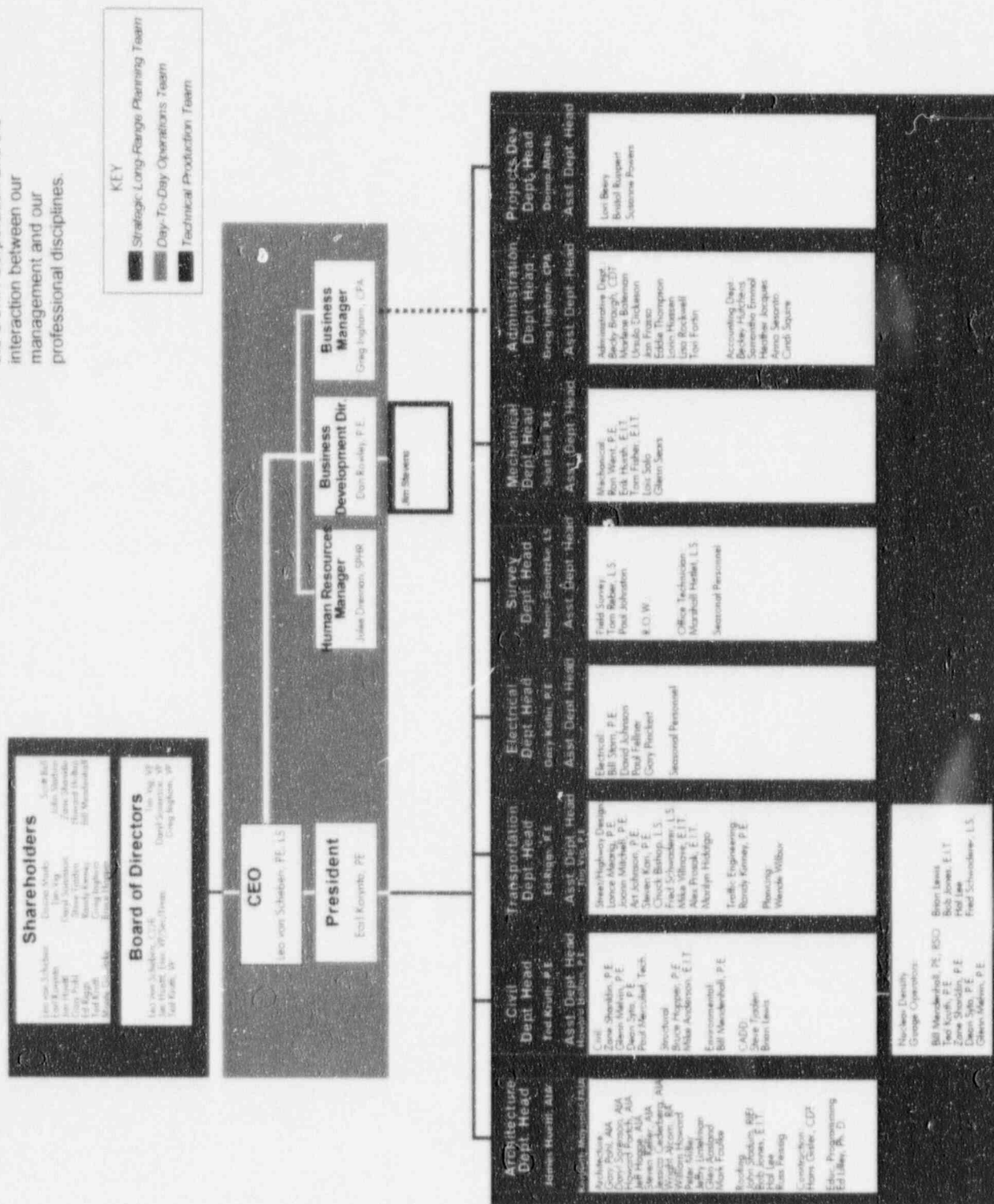
Mr. Mendenhall is an owner of USKH. Both Management and Mr. Mendenhall support the required commitment to assure that all the required duties of the RSO are maintained. USKH intends to annually send Mr. Mendenhall to attend classes for updating on revision in the regulations or procedures. In addition, Troxler Laboratories, the manufacturer of the gauge, will also inform the company of changes in regulations.

An organization chart of USKH is attached.

Mr. Mendenhall's duties and responsibilities will be those listed in Appendix C of *DG-008*.

USKH Management Organization

This management organization chart identifies the structure of the USKH Corporation and the interaction between our management and our professional disciplines.



Attachment for Application for Material License (NRC FORM 313)

ITEM 8: TRAINING FOR INDIVIDUALS WORKING IN OR FREQUENTING RESTRICTED AREA

1. USKH intends to have approximately 10 employees certified to use the Troxler 3400 series gauge. USKH is committed that each individual certified to use the gauge will:
 - a. Successfully complete training offered by the manufacturer's representative. This training will meet the criteria of Part 1 of Appendix D of the *Draft Regulatory Guide DG-0008*. The trainer's qualifications will meet the criteria of Part II of Appendix D of *DG-0008*.
 - b. Have received training and copies of USKH's operating and emergency procedures.
 - c. Be authorized by USKH's RSO.

USKH will maintain records of training certifications as required.

2. Annually, USKH will sponsor refresher training certified to use the gauge. This training will be conducted either by the RSO or by the manufacturer's representative. If the manufacturer's representative conducts the training, they will have the criteria qualifications established in Part II of Appendix D of *DG-0008*. Training will consist of (1) operating and emergency procedures, (2) DOT requirements, (3) changes in applicable regulations or license requirements, (4) deficiencies identified during annual audits of the radiation safety program.

USKH will maintain refresher training records.

Attachment for Application for Material License (NRC FORM 313)

ITEM 9: FACILITIES AND EQUIPMENT

1. The gauge will be kept at USKH's current home office located at 2515 A Street, Anchorage, Alaska.
2. The office is located in commercially-zoned area of the town. Storage of the gauge will not conflict with the city's zoning requirements.
3. USKH will store the gauge in a locked, isolated basement room seldom used. A copy of the room location is attached.
4. The room is always locked and only limited number of people have been issued keys. The door is steel. Presently, access to the room occurs less than three times a year and only by authorized individuals. *who?*
5. During times when the gauge is transported, if left unattended, it will be either locked in a truck or chained to a vehicle. A combination lock will affix the chain. During off duty periods, the gauge will be locked in USKH's storage room.
6. If the gauge is transported to an out of town location, USKH will arrange with the client for storage of the gauge in a secure location during off hours. During working hours, the gauge will be kept under constant surveillance. When this is not possible, the gauge will be placed in a protected and secure location. This may include placing the gauge in a vehicle truck or locking it to the bed of a pick up.
7. During use in the Anchorage area, the operator will return the gauge to the secure room at USKH's office. If it is to be used at an out of town location, USKH will make arrangements with the client for storing it in a secure area.

Attachment for Application for Material License (NRC FORM 313)

ITEM 10: RADIATION SAFETY PROGRAM

10.1 Personnel Monitoring Program

1. All authorized users of USKH's Troxler 3400 series will be issued TLD detection badges for gamma-neutron dosimetry. These will be supplied and analyzed by Troxler Radiation Monitoring Services, Inc. of Research Triangle, NC; they are NVLAP certified.
2. TLD badges will be issued to each authorized user of the gauge.
3. During the construction season, badges will be exchanged every three months. If a project requires use of the gauge outside of the typical construction season, USKH's RSO will issue badges to the authorized individuals as required. All badges will be exchanged every three months.

USKH will not perform any work that required the removal of the source from its shielding

10.2 Radiation Detection Instruments

Should there be an accident that might cause a breach of the shielding material, USKH is aware of several radiation meters available for use. These are available from the gauge manufacturer, the State of Alaska, and Response Rentals. Use will commit to quickly obtaining a survey meter if a need arises.

10.3 Leak Testing

3880 ?
USKH will employ a leak-test available from Troxler and send the test's smears to them for analysis. We will conduct this test twice annually. The Troxler provided Leak Test Kit, model #102868, will be used to test for radiation leakage. USKH's RSO will send the swipe sample to Troxler Electronic Labs, 3008 Cornwallis Rd., Research Triangle Park, NC for testing. We will follow the manufacturer's instruction when obtaining the test samples.

The tests will be done by USKH's RSO

10.4 Inventories

USKH will conduct semiannual inventories of all sealed sources and devices received or possessed under the license. We will maintain these inventories for three years. These inventories will include the date of inventory, amount of by product in each sealed source, manufacturer's name and model number, and serial number.

10.5 Maintenance

All periodic maintenance will be done with the source retracted in its safe and shielded position. No maintenance will be conducted by USKH that will require work with an unshielded source. The manufacturer will do all such work.

10.6 Transportation of Devices to Field Locations

USKH will keep abreast of the current DOT regulations regarding shipment of the device. We will maintain procedures that comply with the latest DOT requirements.

10.7 Operating and Emergency Procedures

See Attached Sheets

10.8 Annual Audit

USKH's RSO, Mr. Mendenhall will be responsible for annual audits. His resume is included elsewhere in this application package.

USKH will conduct audits described in Appendix I of the *Draft Regulatory Guide DG-0008*.

USKH will conduct audits annually and we will maintain records of the audit for three years.

Management will promptly review the results of the audit.

The company will promptly correct deficiencies identified during audits and inform all personnel of the deficiencies and the actions management expects its personnel to take to avoid similar deficiencies.

10.9 Financial Assurance and Record Keeping

1. The amount of radioactive material for the number of devices USKH will have, own, or maintain is below the threshold levels of 100,000 Ci of Cs-137 and 100 Ci Am-241.
2. The RSO will maintain the requisite records for decommissioning. These records will cover spills, leaking sources, or other unusual incidents involving contamination.
3. USKH will restrict the possession of licensed material to quantities of below those specified in 10 CFR 35.35(d). The materials to be in the possession of USKH are listed in Item 5.

Attachment for Application for Material License (NRC FORM 313)

ITEM 11: WASTE MANAGEMENT

USKH will transfer radioactive waste material to a person who is specifically licensed to receive and possess it. This person will be responsible for disposal at a regulated site.

STANDARD OPERATING AND EMERGENCY PROCEDURES

I. STANDARD OPERATING PROCEDURES

1. Before removing the gauge from its place of storage, check to make sure the gauge source rod is retracted and locked in that position.
2. Lock the gauge in the transport case.
3. Sign the gauge out in the log book and provide the following information:
state the dates of use
names of the authorized users who will be responsible for the gauge
jobsites where the gauge will be used.
4. Never leave the gauge unattended while in your custody.
5. Follow all applicable Department of Transportation (DOT) requirements when transporting the gauge. If shipped by air, it must go on a cargo flight with the proper completed formwork. **See Bill Mendenhall, USKH's RSO before shipping by air.**
6. Do not touch the source rod with your fingers, hands, or any part of your body, and always make sure the source rod is in the shielded position after each measurement is made.
7. Always wear your assigned thermoluminescent dosimeter (TLD) when using the gauge. **Never wear another person's TLD or film badge.**
8. Never store your TLD or film badge near the gauge.
9. Always keep unauthorized persons away from the area where the gauge is to be used.
10. Always maintain constant surveillance and immediate control of the gauge when it is not in storage.
 - ◆ To make gauges more visible to operators of heavy equipment at construction sites, always "stake and flag" each gauge, being sure that the flags are tall enough to be seen by heavy equipment operators.
11. Never look under the gauge when the source rod is being lowered into the ground.
12. After each measurement, always return the source to the shielded position and lock it there.
13. When the gauge is not in use at a temporary jobsite, place the gauge in a secured storage location (e.g., locked in the trunk of a car or locked in a storage shed).
14. Return the gauge to its proper storage location at the end of the work shift.

15. When the gauge is returned to storage, so indicate in the source log.

II. EMERGENCY PROCEDURES

1. Immediate Responses

a. Establish Priorities As Required

- ◆ Perform life saving measures
- ◆ Control of fire or other hazards
- ◆ First aid

2. Secondary Responses

- a. If the source fails to return to the shielded position (e.g., as a result of being damaged) or if any other emergency or unusual situation arises (e.g., the gauge is struck by a moving vehicle, is dropped, or is in a vehicle involved in an accident):

Immediately secure the area around the gauge.

Prevent unauthorized personnel from entering the secured area.

- b. If any heavy equipment is involved, detain the equipment until it is determined there is no contamination present.

A fiberglass whip with a flag at the top (available as a bicycle accessory) can be attached to the gauge to make its location more obvious to heavy equipment operators.

- c. Notify licensee management of the situation, calling company personnel in the order listed below.

Bill Mendenhall 276-4245(w) 694-6215(h) 227-8510(cell)

Ted Kruth 276-4245(w) 229-1665(cell)

Troxler Electronic Laboratories 1-919-839-2676

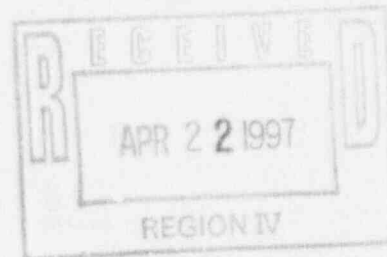
- d. Follow the directions provided by the person contacted in step 3 above.

- e. LICENSEE MANAGEMENT MUST:

Arrange for a survey to be conducted as soon as possible by a knowledgeable person using appropriate radiation detection instrumentation. (This person could be a licensee employee using a survey meter located at the jobsite or a consultant.)

Make necessary notifications to local authorities; notify the NRC as required. (Even if not required to do so, you may report ANY incident to NRC by calling NRC's Emergency Operations Center at (301) 816-5100, which is staffed 24 hours a day and accepts collect calls. NRC notification is required when gauges containing licensed material are lost or stolen, and when gauges are damaged or involved in incidents that result in doses in excess of the dose limits in 10 CFR 20.2203. The attached memorandum from R. E. Cunningham, dated July 1, 1993, provides additional guidance.)

Consider the timeliness of reports to the NRC.



APERTURE CARD/PAPER COPY AVAILABLE THROUGH NRC FILE CENTER

NUMBER OF OVERSIZE PAGES FILMED ON APERTURE CARD(S) 1

9706190126-01