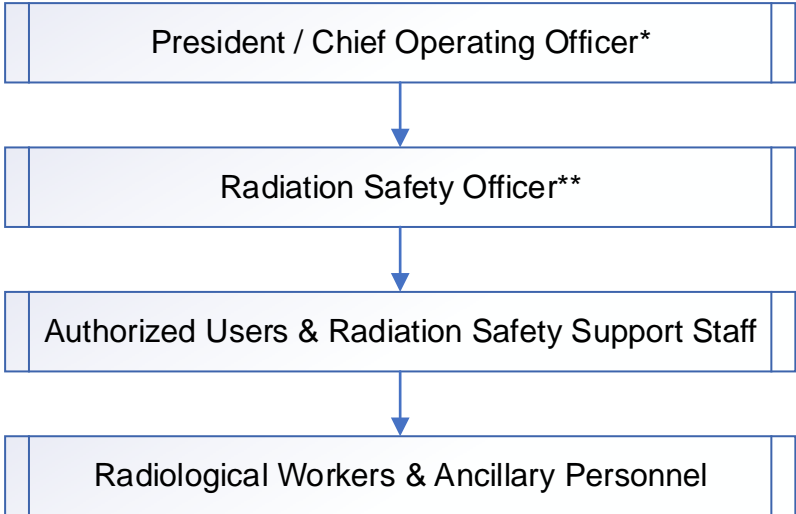


**CABRERA – NRC FORM 313
APPENDIX B - ATTACHMENT 1
Responses to Specific NUREG-1556 Vol 18 Rev.1
Matrix Items 5 - 11**

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Item No.	Response(s)
5.3	<p>RADIOACTIVE MATERIAL</p> <p>Recordkeeping For Decommissioning</p> <p>Pursuant to 10 CFR 30.35(g), 10 CFR 40.36(f), and 10 CFR 70.25(g), and 10 CFR 70.51(b)(3), as appropriate, Cabrera will maintain drawings and records important to decommissioning and will transfer these records to an NRC or Agreement State licensee before licensed activities are transferred.</p> <p>Furthermore, pursuant to 10 CFR 30.51(f), 10 CFR 40.61(f), and 10 CFR 70.51(a), as appropriate, prior to license termination, Cabrera will forward the records required by 10 CFR 30.35(g), 10 CFR 40.36(f), and 10 CFR 70.25(g), as appropriate, to the appropriate NRC regional office or to assign the records to the appropriate NRC regional office before the license is terminated.</p>
5.4	<p>RADIOACTIVE MATERIAL</p> <p>Financial Assurance</p> <p>We shall restrict the possession of licensed material to quantities below the minimum limit specified in 10 CFR 30.35(d), 10 CFR 40.36(b), and/or 10 CFR 70.25(d) for establishing decommissioning financial assurance.</p>

Item No.	Response(s)
7.1	<p>INDIVIDUAL(S) RESPONSIBLE FOR RADIATION SAFETY PROGRAM AND THEIR TRAINING EXPERIENCE</p> <p>Radiation Safety Officer</p> <p>The proposed Radiation Safety Officer, Michael S. Winters, C.H.P. is responsible for effective implementation and maintenance of the Cabrera Radiation Safety Program. Training, certifications, and resume for Mr. Winters, the current RSO for Lic. No.06-30556-01, were previously submitted in Letter "RSO Change for Cabrera Services, Inc. (Lic. No. 06-30556-01)" dated February 25, 2014.</p> <p style="text-align: center;">Cabrera Services Radiation Safety Organization</p> <div style="text-align: center;">  <pre> graph TD A[President / Chief Operating Officer*] --> B[Radiation Safety Officer**] B --> C[Authorized Users & Radiation Safety Support Staff] C --> D[Radiological Workers & Ancillary Personnel] </pre> </div> <p>*The RSO reports directly to the President/Chief Operating Officer of Cabrera Services, Inc. or, a designated Vice President with authority and responsibility to provide resources and oversight, as needed to ensure effective radiation safety program implementation.</p> <p>**The RSO shall be available for emergencies and to respond on-site within 24-48 hours.</p>

<p align="center">7.2</p>	<p>INDIVIDUAL(S) RESPONSIBLE FOR RADIATION SAFETY PROGRAM AND THEIR TRAINING EXPERIENCE</p> <p>Authorized Users And Radiation Workers</p> <p>A Cabrera Authorized User (AU) is designated in writing by the RSO; oversees uses of radioactive materials at a temporary jobsite and; is responsible for ensuring that radioactive materials are handled and used safely and in accordance with NRC regulations and the terms and conditions of the NRC license. AUs report to the RSO on Radiation Safety Matters.</p> <p>Before independently using or, overseeing the use of licensed material by others, personnel designated as authorized users will:</p> <ul style="list-style-type: none"> • Receive the training described in NUREG-1556, Volume 18, Revision 1, Appendix D “Criteria for Acceptable Training and Experience for Authorized Users” OR • Demonstrate equivalent qualification by having at least one year of hands-on work experience supporting implementation of a radiation safety program at a facility or job site commensurate with the scope of NRC Materials License No. 06-30556-01 AND review the current license terms, conditions and applicable regulations AND review the radiation safety program AND produce documentation for review and acceptance by the RSO that demonstrates current/past evidence of one or more of the following: <ul style="list-style-type: none"> ○ Designation as an RSO or AU on a NRC or Agreement State License ○ Designation as a RadCon Manager or qualified as a RadCon Technician for a Department of Energy Activity ○ Certification by the American Board of Health Physics ○ Registration by the National Registry of Radiation Protection Technologists ○ Bachelors (or higher) Degree in Nuclear/Environmental Sciences or related Scientific Discipline ○ Associates Degree (or higher) in Health Physics/Radiation Protection Technology ○ Department of Defense Health Physicist, Radioactive Waste Broker, Engineering Lab Technician, Radiological Controls Technician or equivalent ○ Department of Energy Radiological Controls Technician Training. ○ Radiation Safety Program/Officer related training of at least 40 hours <p>Other individuals, including Radiation Workers who perform duties under the direct oversight of the RSO or AU and, are likely to receive over the course</p>
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Item No.	Response(s)
	<p>of employment in a year an occupational dose in excess of 100 mrem (1 mSv) shall be:</p> <ol style="list-style-type: none"> (1) Kept informed of the storage, transfer, or use of radiation and/or radioactive material; (2) Instructed in the health protection problems associated with exposure to radiation and/or radioactive material, in precautions or procedures to minimize exposure, and in the purposes and functions of protective devices employed; (3) Instructed in, and required to observe, to the extent within the workers control, the applicable provisions of Commission regulations and licenses for the protection of personnel from exposure to radiation and/or radioactive material; (4) Instructed of their responsibility to report promptly to the licensee any condition which may lead to or cause a violation of Commission regulations and licenses or unnecessary exposure to radiation and/or radioactive material; (5) Instructed in the appropriate response to warnings made in the event of any unusual occurrence or malfunction that may involve exposure to radiation and/or radioactive material; and (6) Advised as to the radiation exposure reports which workers may request pursuant to 10 CFR 19.13.
8	<p>TRAINING FOR INDIVIDUALS WORKING IN OR FREQUENTING RESTRICTED AREAS</p> <p>Before working in the vicinity of licensed materials, personnel will have successfully completed training commensurate with assigned duties.</p>
9	<p>FACILITIES AND EQUIPMENT High Risk Activities</p> <p>Services provided by Cabrera will only be performed at temporary job sites. This license application is for services listed in the high-risk group but there are no permanent facilities specifically identified on the license, nor will we take possession of radioactive materials from the temporary jobsite.</p> <p>No facility description is required for such temporary job sites.</p>

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Item No.	Response(s)
10.1	<p>RADIATION SAFETY PROGRAM Operating and Emergency Procedures</p> <p>Cabrera Services Inc, (Cabrera) recognizes the need for operational and emergency procedures to support the safe handling of radioactive materials.</p> <p>Key operating and emergency procedures are contained within Cabrera Radiation Safety Manual (provided as NRC Form 313, Appendix B, Attachment 2).</p>
10.2	<p>RADIATION SAFETY PROGRAM Material Receipt and Accountability</p> <p>We will develop, implement, and maintain procedures for ensuring accountability of licensed materials at all times.</p> <p>Physical inventories will be conducted at intervals not to exceed 6 months, to account for all sealed sources and devices received and possessed under the license. Records of inventory will be maintained for a period of 3 years from the date of each inventory, and will include the radionuclides, quantities, manufacturer's name and model numbers, and the date of the inventory.</p>

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Item No.	Response(s)
10.3	<p>RADIATION SAFETY PROGRAM Radiation Monitoring Instruments</p> <p>Cabrera will use instruments that meet the radiation monitoring instrument specifications published in Appendix F of NUREG–1556, Volume 18, Revision 1, “Consolidated Guidance About Materials Licenses: Program-Specific Guidance About Service Provider Licenses”.</p> <p>Additionally, Cabrera will implement the model radiation survey meter calibration program published in Appendix F of NUREG–1556, Volume 18, Revision 1, “Consolidated Guidance About Materials Licenses: Program-Specific Guidance About Service Provider Licenses”.</p> <p>Cabrera reserves the right to upgrade our survey instruments as necessary.</p> <p>In addition to portable and non-portable radiation survey instruments, Cabrera may utilize effluent monitoring equipment; respiratory protection equipment; glove bags, tents and other containments to limit the spread of contamination; remote handling equipment or other specialized equipment to maintain dose ALARA; waste handling equipment; protective clothing and respiratory protection equipment; portable shielding, storage containers; global positioning equipment; portable and fixed gamma spectroscopy systems; sampling and analysis equipment as needed for each project. Cabrera confirms that all equipment, tools and materials utilized will be appropriately calibrated and maintained as applicable.</p>
10.4	<p>RADIATION SAFETY PROGRAM Surveys</p> <p>Cabrera will conduct surveys and maintain contamination levels in accordance with the survey frequencies and contamination levels published in Section 8.10.4 of NUREG-1556, Volume 18, Revision 1. “Consolidated Guidance About Materials Licenses: Program-Specific Guidance About Service Provider Licenses.”</p> <p>For unrestricted release of materials, tools, and equipment (not facilities) from license control, Cabrera may alternatively refer to methodologies and criteria presented in NUREG-1575, Supplement 1, “Multi-Agency Radiation Survey and Assessment of Materials and Equipment Manual (MARSAME)”.</p>

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Item No.	Response(s)
10.5	<p>RADIATION SAFETY PROGRAM Leak tests</p> <p>We will perform our leak testing and analysis. We will follow the model procedures in Appendix G of NUREG–1556, Volume 18, Revision 1, “Consolidated Guidance About Materials Licenses: Program-Specific Guidance About Service Provider Licenses.</p>
10.6	<p>RADIATION SAFETY PROGRAM Occupational Dose</p> <p>We will monitor individuals in accordance with the criteria in the Section 8.10.6, ‘Radiation Safety Program–Occupational Dose’ in NUREG–1556, Volume 18, Revision 1, “Consolidated Guidance About Materials Licenses: Program-Specific Guidance About Service Provider Licenses.</p>
10.9	<p>ROUTINE MAINTENANCE</p> <p>We will implement and maintain procedures for conducting routine maintenance of devices according to each manufacturer’s (or distributor’s) written recommendations and instructions.</p> <p>NONROUTINE MAINTENANCE</p> <p>We will obtain prior NRC approval, if OEM replacement parts cannot be used, for sealed source shielding, the source driving unit, or other electrical or mechanical component that could expose the source, reduce the shielding around the source, or compromise the radiation safety of the device or the source.</p> <p>We will have the device manufacturer (or distributor) or other person authorized by NRC or an Agreement State to perform nonroutine maintenance of devices.</p>
11	<p>WASTE MANAGEMENT</p> <p>We will use the model waste procedures published in Appendix M of NUREG–1556, Volume 18, Revision 1, “Consolidated Guidance About Materials Licenses: Program Specific Guidance About Service Provider Licenses”.</p>