



UNITED STATES
NUCLEAR REGULATORY COMMISSION

REGION IV
612 EAST LAMAR BLVD., SUITE 400
ARLINGTON, TEXAS 76011-4125

FACSIMILE



Name: Arthur J. Palmer
Organization: Strathmore Resources (US) Ltd. Docket No. 030-37669
Control No. 471714
Fax: 801-780-8854
Phone: 865-483-8620 Ext. 229
From: Jacqueline D. Cook
Date: May 29, 2008
Subject: Application dated February 26, 2008 for New License
Pages: 5

Mr. Palmer:

Per your application dated February 26, 2008, the items on the next page are deficiencies which require your response. **Please respond to this fax by Monday, June 30, 2008.** If you are unable to respond by this due date, please don't hesitate to contact me so we can discuss an extension to the date. Our fax number is (817) 860-8263. You may respond by email if you'd like. My email address is Jackie.Cook@nrc.gov. If you have any questions regarding this fax, please call me at (817) 860-8132. When responding to this fax, please include the docket and control numbers located at the top of this page.

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

/RA/
Jacqueline D. Cook
Senior Health Physicist

1. Please submit documentation of the alternative information demonstrating that the proposed RSO is qualified by training and experience, e.g., listed by name as an authorized user or the RSO on an NRC or Agreement State license that requires a radiation safety program of comparable size and scope.
2. A. Please clarify if you have a separate training program for logging assistants. If so, please submit your training program for logging assistants to include the following:
 - ◆ Received copies of Parts 19, 20, & Operating & Emergency (O & E) Procedures.
 - ◆ Classroom instruction in Parts 19 & 20.
 - ◆ Instruction in the use of licensed materials, remote handling tools, survey equipment, etc.
 - ◆ Successfully completed a verbal or written examination.
 - ◆ Provide a copy of a typical examination and the correct answers to the examination questions. Indicate the minimum passing grade.
 - ◆ Records maintained for 3 years (copies of quizzes and dates of oral examinations, if applicable).
- B. Please expand your training of well logging supervisors to include:
 - ◆ Training in your NRC license
 - ◆ Records maintained for 3 years (copies of written quizzes)
- C. Please specify the address and telephone number of the company providing the initial training (Radiation Consultants, Inc.), in addition to providing a course outline (if available).
- D. Specify the qualifications of your instructors in radiation safety principles and describe their experience with well logging activities.
- E. Please describe the field (practical examination that will be given to prospective logging supervisors and logging assistants. The NRC suggests using the checklist in Appendix M of NUREG-1556, Vol. 14, as a source of potential areas to review during the field examination.
- F. Please describe the annual refresher training program, including topics to be covered and how the training will be conducted.

- G. Please submit a description of your program for inspecting the job performance of each well logging supervisor or logging assistant at intervals not to exceed 12 months.
- 3.
- A. Please submit a sketch or drawing to scale of the well logging truck in which the neutron generator will be stored.
 - B. Please show in the drawings the following:
 - ◆ Where applicable, adjacent buildings, boundary lines, security fences, and lockable storage areas.
 - ◆ The relationship and distance between restricted areas and adjacent unrestricted areas.
 - ◆ Specify shielding materials (concrete, lead, etc.) and means for securing radioactive materials from unauthorized removal.
4. Please provide one of the following:
- ◆ A statement that: "We will obtain a written agreement prior to well logging with a sealed source that meets the requirements specified in 10 CFR 39.15."

OR

- ◆ If the requirement for a written agreement does not apply to you, then you should include a statement in your application that you will only log holes where the well owner or operator is part of your corporate structure or otherwise similarly affiliated, and you should describe the corporate affiliation.
5. Please note that each licensee must develop, implement, and maintain operating and emergency procedures (O&EPs) or submit a summary of the procedures that addresses the important radiation safety aspects of each to the NRC as part of your application package. O&EPs' elements must include the items outlined in 10 CFR 39.63. The following is provided as a checklist of important items:
- ◆ Instructions for handling and using licensed materials, including sealed sources in wells, without surface casing for protecting fresh water aquifers.
 - ◆ Instructions for maintaining security during storage and transportation.
 - ◆ Instructions to keep licensed material under control and under immediate surveillance during use.
 - ◆ Steps to take to keep radiation exposures ALARA.

- ◆ Steps to maintain accountability during use.
- ◆ Steps to control access to work sites.
- ◆ Steps to take and whom to contact when an emergency occurs.
- ◆ Instructions for using remote handling tools when handling sealed sources, except low-activity calibration sources and radioactive tracer materials.
- ◆ Methods and occasions for conducting radiation surveys, including surveys for detecting contamination, as required by 10 CFR 39.67(c)-(e).
- ◆ Procedures to minimize personnel exposure during routine use and in the event of an incident.
- ◆ Methods and occasions for locking and securing stored licensed materials.
- ◆ Personnel monitoring and the use of personnel monitoring equipment.
- ◆ Transportation of licensed materials to field stations or temporary job sites, packaging of licensed materials for transport in vehicles, placarding of vehicles when needed, and physically securing licensed materials in transport vehicles during transportation to prevent accidental loss, tampering, or unauthorized removal.
- ◆ Procedures for picking up, receiving, and opening packages containing licensed materials, in accordance with 10 CFR 20.1906.
- ◆ Instructions for maintaining records in accordance with the regulations and the license conditions.
- ◆ Steps for the use, inspection, and maintenance of sealed sources, source holders, logging tools, injection tools, source handling tools, storage containers, transport containers, and uranium sinker bars, as required by 10 CFR 39.43.
- ◆ Procedures for identifying and reporting to NRC defects and noncompliance, as required by 10 CFR 21.21(a).
- ◆ Actions to be taken if a sealed source is lodged in a well.
- ◆ Procedures and actions to be taken if a sealed source is ruptured, including actions to prevent the spread of contamination and actions to obtain suitable radiation survey instruments, as required by 10 CFR 39.33(b)

- ◆ Instructions for the proper storage and disposal of radioactive waste.
- ◆ Procedures for decontaminating equipment and vehicles.

Please note that applicants should either submit their O&EPs or an outline or summary as described in 10 CFR 39.13(c) in responding to subsequent sections noted above.

6. Please confirm that the O&EPs address handling of contamination resulting from the routine use, initial installation, replacement, or accidental damage of the targets or glass tubes.