



ARCHIMICA FAX

DATE: January 13, 2012
TO: Bill Reichhold, Nuclear Regulatory Commission
FROM: Bryce Parker for Steve Hancock
SUBJECT: Deficiencies in Renewal Request for NRC License – **Control # 575755.**

Please note the attached pages returned by fax at your request.

If you have any further comments, questions or need additional information please contact either Steve Hancock at 417-868-3325 or myself at 417-868-3314.

Sincerely,

A handwritten signature in black ink, appearing to read "Bryce Parker", written in a cursive style.

Bryce Parker
Materials & Environmental Services Manager
Archimica Inc.
2460 W. Bennett St.
Springfield, MO 65807
417-868-3314
417-868-3380 - fax

APPENDIX B

Item No. and Title	Suggested Response	Yes	Alternative Procedures Attached
<p>10. Radiation Safety Program - Operating & Emergency Procedures</p>	<p>If the gauge meets one or more of the safety conditions specified in "Discussion," in the section entitled "Radiation Safety Program-Operating Emergency Procedures," in NUREG 1556, Vol. 4, dated August <u>October</u> 1998 state the following:</p> <p>Operating and emergency procedures will be developed, implemented, maintained, and distributed, and will meet the Criteria in the section entitled "Radiation Safety Program - Operating and Emergency Procedures," in NUREG-1556, Vol. 4, dated August 1998.</p> <p>October</p> <p>For each gauge requested that does not meet one or more of the safety conditions specified in "Discussion," in the section entitled "Radiation Safety Program-Operating Emergency Procedures," in NUREG 1556, Vol. 4, dated August 1998 provide your operating, emergency and lock-out (if applicable) procedures to NRC for review.</p>	<p><input checked="" type="checkbox"/></p> <p><input type="checkbox"/> Procedures Attached</p>	<p><input type="checkbox"/></p>
<p>10. Radiation Safety Program - Leak Test</p>	<p>Leak tests will be performed at intervals approved by the NRC or an Agreement State and specified in the Sealed Source and Device Registration Certificate. Leak tests will be performed by an organization authorized by NRC or an Agreement State to provide leak testing services for other licensees or using a leak test kit supplied by an organization authorized by NRC or an Agreement State to provide leak test kits to other licensees and according to the kit supplier's instructions.</p> <p>OR</p> <p>We will implement the model leak test program published in Appendix M to NUREG-1556, Vol. 4, dated August 1998.</p>	<p><input type="checkbox"/></p> <p><input type="checkbox"/></p>	<p><input type="checkbox"/></p>

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10. Radiation Safety Program - Maintenance	<p>ROUTINE MAINTENANCE We will implement and maintain procedures for routine maintenance of our fixed gauges according to each manufacturer's or distributor's written recommendations and instructions.</p> <p>NON-ROUTINE MAINTENANCE OPERATIONS The gauge manufacturer, distributor or other person authorized by NRC or an Agreement State will perform non-routine operations such as installation, initial radiation survey, repair, and maintenance of components related to the radiological safety of the gauge, gauge relocation, replacement, and disposal of sealed sources, alignment, or removal of a gauge from service.</p>	<p><input checked="" type="checkbox"/></p> <p><input type="checkbox"/></p>	<p><input type="checkbox"/></p> <p><input type="checkbox"/> The information listed in Appendix N supporting a request to perform non-routine operations in-house is attached</p>
10. Radiation Safety Program - Transportation	<p>The applicant is not required to submit its response to transportation during the licensing process; this issue will be reviewed during inspection. However, the licensee should develop, implement, and maintain transportation procedures according to NRC and DOT regulations.</p>	<p>Need Not Be Submitted with Application</p>	
10. Radiation Safety Program - Fixed Gauges Used at Temporary Job Sites	<p>This is not applicable to our program. We will not use fixed gauges at temporary job sites.</p> <p style="text-align: center;">OR</p> <p>We will develop, implement, maintain and distribute procedures that meet the Criteria in the section entitled "Radiation Safety Program - Fixed Gauges Used at Temporary Job Sites" in NUREG-1556, Vol. 4, dated August 1998.</p>	<p><input type="checkbox"/> Not Applicable</p> <p><input type="checkbox"/></p>	<p><input type="checkbox"/></p>
10. Radiation Safety Program - Minimization of Contamination	<p>The applicant is not required to submit a response to minimization of contamination if the applicant's responses meet the criteria for the following sections: Radioactive Material - Sealed Sources and Devices, Facilities and Equipment, Radiation Safety Program - Operating and Emergency Procedures, Radiation Safety Program - Leak Testing, and Waste Management - Gauge Transfer and Disposal.</p>	<p>Need Not Be Submitted with Application</p>	

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