



**LAW**

ENGINEERING AND ENVIRONMENTAL SERVICES

DL-041795-03

April 17, 1995

U.S. Nuclear Regulatory Commission  
Region II  
101 Marietta Street, N.W. Suite 2900  
Atlanta, GA 30323-0199

Attention: Mr. David J. Collins

Subject: Response to Additional Information Request  
Ref: Mail Control 256138; Docket No 030-14949  
License No. 45-18377-01

This refers to your "Request for more information about a Materials License Application" dated December 30, 1994. We are enclosing a copy of this letter, along with responses to your specific requests.

Item

No.

Actions

5.4 Please include the following statement as a part of our license application

**Possession Limit Commitment**

*We will confine our possession of licensed material to quantities such that we will not exceed the applicable limits of 10 CFR 30.35(d).*

7.3 The RSO's duties and responsibilities will be those listed in Appendix C of Policy and Guidance Directive PG 2-07 (Rev 0), dated September 1994.

The management of the Chesapeake, Virginia office of Law Engineering is committed to provided a safe and effective program under this license. The RSO will be allowed ample time to perform the duties required and will be given the authority to suspend operations under this license should a reasonable safety concern exist.

We have included an organizational chart for the Chesapeake, Virginia office showing the lines of communication within the office.

8.1.2 Refresher training will be provided to all personnel that perform operations under this license at intervals not to exceed 1 year. This training will be approximately 2 hours in length and will contain, at a minimum, the following:

1. Operating and emergency procedures ( including "dry runs" )
2. DOT requirements.
3. Changes in applicable regulations or license conditions.
4. Any deficiencies identified during the performance of annual radiation safety audits.

The above training will be performed by Thomas D. Adams (resume and training documentation attached) who meets the requirements of Part II of Appendix D of Policy and Guidance Directive PG 2-07 (Rev 0), dated September 1994.

LAW ENGINEERING, INC.

804 PROFESSIONAL PLACE WEST • CHESAPEAKE, VA 23320

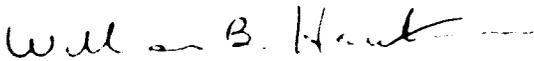
(804) 436 2040 • FAX (804) 436 9933

- 9.7 <sup>ok</sup> Gauges are to be returned to the permanent storage location at the end of each work day. Should this not be practical, due to logistical constraints, the gauge will be locked in an area which will not be accessible to the public and will meet the requirements of 10 CFR 20.1903 and 10 CFR 20.1301.
- 10.1.2 <sup>ok</sup> Our personnel dosimetry will be processed by Landauer, Inc.. A copy of their NVLAP approval is attached.
- 10.2 <sup>ok</sup> Law Engineering will have available, at it's Chesapeake, Virginia office, at least one survey instrument capable of measuring between 1 mr/hr and 100 mr/hr. This instrument will be used to perform surveys after an incident. Each instrument will be calibrated by an approved calibration facility ( NEWCO, Inc. 301 Second Loop, Florence, SC 29505, License No. 318 ) at intervals not to exceed 6 months. The survey instrument will be a Biocron Radiographer Model or equivalent.
- 10.4 <sup>ok</sup> Physical isotope inventories will be performed during the 6 month leak tests and records shall be kept for a period of 3 years.
- 10.5 <sup>ok</sup> All periodic maintenance of devices will be performed in accordance with the manufacturers' recommendations.
- 10.6 <sup>ok</sup> Law Engineering's Chesapeake, Virginia office will obtain and follow the provisions of the Department of Transportation regulations as required by 10 CFR 71.5.
- 10.7 <sup>ok</sup> A copy of our updated " Standard operating and Emergency Procedures " is attached.
- 10.8 <sup>ok</sup> We will conduct audits, on an annual basis, as described in Appendix I of Policy and Guidance Directive PG 2-07 (Rev 0), dated September 1994.
- 10.9 <sup>ok</sup> Records relating to events involving spills, leaking sources, or other unusual incidents that involve the possible spread of contamination will be maintained in the Chesapeake, Virginia office of Law Engineering until the termination of licensed activities.
- 11 <sup>ok</sup> Licensed materials will be transfer only to the manufacturer or other entities specifically authorized to possess the materials to be transferred. Prior to shipping the recipient's authorization to possess the materials will be verified.
- 13 <sup>ok</sup> Future correspondence will be signed by an official of the company.

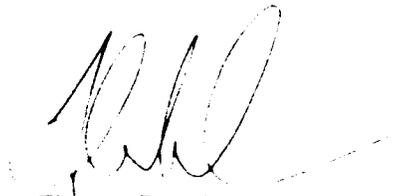
*NRC Response*  
*April 17, 1995*

Should you have any additional comments or require more information, please contact us at (804) 436-2040. We appreciate your cooperation and look forward to receiving our renewal.

**LAW ENGINEERING AND ENVIRONMENTAL SERVICES, INC.**



William B. Horstman  
Radiation Safety Officer



Thomas D. Adams  
Manager - Technical Services

  
John E. Spencer, P.F.  
Manager - So. Virginia