



# Radioactive Materials (RAM) Well Logging Licensing Checklist

Licensee \_\_\_\_\_ Lic.# \_\_\_\_\_

## Submit only 1 copy of each document.

Review the NUREG-1556 Volume 14, using the current revision. It can be used as guidance to complete this checklist. <http://www.nrc.gov/reading-rm/doc-collections/nuregs/staff/sr1556/>

- Submit all Policy and Procedures to the Nevada Radiation Control Program (RCP).
- Submit the Application** signed by executive management, or a person authorized to sign original documents.
  - Submit an organizational chart with names, depicting where the Radiation Safety Officer (RSO) and the executive management fit into the organization.
  - If application or checklist is signed by an individual other than the RSO, submit a Non-RSO Delegation of Authority form.  
[http://dpbh.nv.gov/uploadedFiles/dpbh.nv.gov/content/Reg/Radoactive-Mtl/dta/Forms/NON-RSO\\_RPDelegationofAuthority.pdf](http://dpbh.nv.gov/uploadedFiles/dpbh.nv.gov/content/Reg/Radoactive-Mtl/dta/Forms/NON-RSO_RPDelegationofAuthority.pdf)
  - Submit documentation of the desired isotopes applicable to the license and licensed processes include the following:
    - Sealed sources
      - Identify each radionuclide (element name and mass number)
      - Provide the manufacturer's or distributor's name and model number for each sealed source and, if applicable, device requested.
      - Confirm that the activity per source and maximum activity in each device will not exceed the maximum activity listed on the approved certificate of registration issued by the NRC or by an Agreement State
      - Confirm that each sealed source, device, and source and device combination is registered as an approved sealed source or device by the NRC or an Agreement State, and will be possessed and used in accordance with the conditions specified in the registration certificate. Provide the SSD registration certificate number, if available.
      - Identify each sealed source or energy compensation source by the manufacturer's name, model number, radionuclide (element name and mass number), maximum activity per source, and total activity requested.
      - Identify any sealed sources or corresponding devices not used in well logging that contain byproduct, special nuclear, or source material, and specify the manufacturer's name, model number, and radionuclide (element name and mass number). Examples of such devices are calibration devices used for radiation survey instruments and pocket dosimeters, and sources used above ground for calibrating well logging tools.

- Sealed sources (continued)
  - For each sealed source and radionuclide request in the application, state the purpose for the licensed material using the following list: (1) Oil and gas well logging, (2) mineral well logging, (3) Geophysical well logging, (4) Tracer studies in single wells, or (5) Field flood or enhanced recovery sutides in multiple wells.
  - Identify the manufacturer's name and model number of depleted uranium sinker bars.
- Unsealed (tracer Radioactive Material (including both volatile and nonvolatile materials)).
  - Provide element name with mass number, chemical and/or physical form, and maximum requested possession limit.
  - Provide information for volatile materials, if known, on the anticipated rate of volatility or dispersion. This information may be obtained from the tracer material vendor, supplier, or manufacturer.
  - Identify each chemical and/or physical form (e.g., liquid, gas, or labeled frac sands) requested for each type of tracer study.
  - Specify the maximum amount of each radionuclide tracer that will be used in each type of tracer study by its physical or chemical form. Identifying the forms as "any" is unacceptable
  - Specify the maximum amount of each radionuclide tracer material that will be possessed at any one time. Possession limits should also include any materials that may be stored as waste.
  - Specify the purpose for which each radionuclide will be used.
  - For each unsealed source and radionuclide request in the application, state the purpose for the licensed material using the following list: (1) Oil and gas well logging, (2) mineral well logging, (3) Geophysical well logging, (4) Tracer studies in single wells, or (5) Field flood or enhanced recovery sutides in multiple wells.
  - Provide an Emergency Plan (if required)
    - Applicants should refer to NAC 459.195 to determine the quantities of radioactive material requiring an emergency plan for responding to a release of radioactive materials.
    - Emergency plans are not routinely required for tracer materials with half-lives of less than 120 days and for quantities authorized in well logging and tracer licenses. See Regulatory Guide 3.67 for additional guidance on developing emergency plans.
  - Provide an Emergency Plan (if required) (continued)
    - Provide determination basis/calculation if emergency plan is not required.

- Financial Assurance and Recordkeeping for Decommissioning
  - Commit that pursuant to NAC 459.1995, as appropriate, we will maintain records important to decommissioning.
  - Provide determination basis/calculation, for the need of a financial assurance in accordance with NAC 459.1995
  - If financial assurance or a decommissioning funding plan is required, we will submit the required documents following the guidance described in NAC 459.1995.
- Calculate the aggregated quantity of all isotopes of concern requested for the license using the unity equation and submit the calculation. If the licensee is an Increased Controls (IC) participant, all information is minimum Official Use Only. Treat all information regarding this licensee with the appropriate caution and sensitivity.
  - If the aggregated quantity of all isotopes of concern equals or exceeds 1.0 in the unity calculation completed above complete the checklist for 10 CFR Part 37 below or mark this section and not applicable (N/A).
- **Storage and use facility address and diagram**
  - Include the addresses of the business office (mailing) and the address where materials will be stored.
  - Submit a facility diagram, drawing or sketch of the proposed facility identifying areas where radioactive materials, including radioactive wastes, will be used or stored.
    - Drawings should show, where applicable, adjacent buildings, boundary lines, security fences, and lockable storage areas.
    - Illustrate area(s) where explosive, flammable, or other hazardous materials may be stored.
    - Drawings should also show the relationship and distance between restricted areas and adjacent unrestricted areas.
    - Drawings should specify shielding materials (e.g., concrete, lead) and means for securing radioactive materials from unauthorized removal.
  - Describe the means of preventing access to licensed materials by unauthorized personnel and provide a detailed description of the two tangible barriers used in securing the storage location.
  - State the physical location(s) where the RCP regulatory required records will be stored and available for review during inspections for both office and field inspections

□ **Storage and use facility address and diagram (continued)**

- Submit a copy of the Landlord Acknowledgement of Responsibilities Related to Radioactive Materials form available at:  
[https://dpbh.nv.gov/uploadedFiles/dpbh.nv.gov/content/Reg/Radoactive-Mtl/Docs/LandlordAcknowledgementForm\(11-17-15\).pdf](https://dpbh.nv.gov/uploadedFiles/dpbh.nv.gov/content/Reg/Radoactive-Mtl/Docs/LandlordAcknowledgementForm(11-17-15).pdf)
- Submit a copy of State or local business license with the storage address.
- Provide the following if requesting the use of tracer materials:
  - Submit a drawing or sketch of the proposed tracer material storage facilities, including rooms, buildings, below ground bunker storage areas, or containers used for storage of both tracer and tracer waste materials, if appropriate. Specify the types and amount of shielding materials (e.g., concrete, lead) and means for securing tracer materials from unauthorized removal
  - Describe items such as protective clothing (e.g., rubber gloves, coveralls, respirators, and face shields), auxiliary shielding, absorbent materials, injection equipment, secondary containers for wastewater storage for decontamination purposes, and plastic bags for storing contaminated items, which will be available at well sites when using tracer materials.
  - Describe proposed laundry facilities, if applicable, used for contaminated protective clothing. Specify how the contaminated wastewater from the laundry machines or sinks is disposed. Operating and emergency procedures should address decontamination of the laundry area and equipment.
  - Describe proposed decontamination facilities for trucks, tracer injection tools, or other equipment contaminated by tracer materials, if applicable. Specify how the contaminated wastewater for these decontamination facilities is disposed. Operating and emergency procedures should address decontamination of these types of equipment and facilities.
  - Describe, if applicable, equipment for “repackaging” gaseous, volatile, or finely divided tracer material. Most tracer users do not repackage materials and acquire their injections in pre-calibrated amounts or “ready-to-use” forms. However, should an applicant request the ability to repackage tracer, volatile, or finely divided material, consider the following equipment when repackaging tracer materials: sinks, trays with absorbent material, glove boxes, fume hoods with charcoal filtration, filtered exhaust, special handling equipment including special tools, rubber gloves, etc.

□ **RSO, and if applicable, Alternate RSO (ARSO)**

- Submit training certificates for Well Logging Safety, current HAZMAT, and RSO training.

□ **RSO, and if applicable, Alternate RSO (ARSO)**

- If applicable submit a previous copy of a RAM license wherein the individual is listed as RSO (if available) & Delegation of Authority. (The same form is used for an ARSO).  
[https://dpbh.nv.gov/uploadedFiles/dpbhnavgov/content/Reg/Radoactive-Mtl/Docs/RSO\\_DelegationAuthority.pdf](https://dpbh.nv.gov/uploadedFiles/dpbhnavgov/content/Reg/Radoactive-Mtl/Docs/RSO_DelegationAuthority.pdf)
- Commit to annual (not to exceed 12 months) safety review (audit of the job performance of each logging supervisor and logging assistant.
  - Submit a description of the program for annual safety reviews of the job performance of each well logging supervisor as described in NAC 459.7701 4.
  - Commit to maintain the training records for three years after the termination of employment for well logging supervisors and assistants.

□ **Logging Supervisors and Assistants**

- Submit a current list of Logging Supervisors and Assistants, including dates of current Well Logging Safety and Hazardous Materials (HAZMAT) training. This form satisfies the request.  
[https://dpbh.nv.gov/uploadedFiles/dpbhnavgov/content/Reg/Radoactive-Mtl/Docs/Well\\_Logging\\_Training\\_Record.pdf](https://dpbh.nv.gov/uploadedFiles/dpbhnavgov/content/Reg/Radoactive-Mtl/Docs/Well_Logging_Training_Record.pdf)
- Submit the training program given to new logging supervisors and logging assistants.
  - Commit that the training program complies with NAC 459.7701 through 459.7705
- Specify the qualifications of the instructors for radiation safety principles and describe their experience with well logging activities. If using a contractor provide the contractor and contact information as well as a syllabus of materials covered.
- Describe field or practical testing that will be given to prospective logging supervisors and logging assistants.
- Describe the annual refresher training program including topics to be covered and the method of conducting training.
- Commit that the RSO will maintain a current list of Well Logging Assistants and Well Logging Supervisors and their training documentation.

□ **Radiation Safety Program**

- Provide Steps/Precautions to keep radiations exposures As Low As Reasonably Achievable (ALARA) or ALARA policy.
- Commit that licensed activities will be conducted by individuals qualified by training and experience.
- Provide a description of actions to protect personnel, the public and the environment minimizing exposure and the risk of the spread of contaminations.

**Radiation Safety Program (continued)**

- Commit that the licensee will implement a security, control and accountability program for radioactive materials located at field stations and temporary job sites.
- If conducting field flood studies provide the following:
  - methods or procedures for preventing the release of contaminated material, equipment, or vehicles to unrestricted use from tracer or field flood study operations
  - radiation safety procedures and the well logging supervisors' responsibilities unique to tracer and field flood study operations
  - tracer and field flood study equipment, techniques, and corresponding radiation safety procedures associated with use of tracer materials
  - information on the appropriate handling, control/security and disposal of any unused tracer materials.
  - Commit that the licensee will implement a security, control, and accountability program for radioactive materials located at field stations and temporary job sites.
- Commit to making notifications as required by NAC 459.7741 to the Radiation Control Program.

**Well Owner or Operator Agreements**

- Commit to obtain a written agreement that meets the requirements specified in NAC 459.7645 prior to well logging.
  - Submit an example of the well logging agreement.
  - Commit to maintain these agreements for not less than three years.
- Commit to providing written instructions to the customer when conducting well logging using unsealed material that describes those subjects listed in the "Discussion" (unsealed material) portion of Section 8.10.1, "Well Owner or Operator Agreements" in NUREG-1556, Volume 14, Revision 1, "Consolidated Guidance about Materials Licenses: Program-Specific Guidance About Well Logging, Tracer, and Field Flood Licenses.

**Radiation Survey Instruments Policy & Procedure**

- Provide a description of the instrumentation that will be used to perform required radiation surveys.
- Commit to keep a calibrated and operable radiation survey instrument capable of detecting beta and gamma radiation at each field station and temporary job site.

**Radiation Survey Instruments Policy& Procedure (continued)**

- Commit to a semi-annual (not to exceed six months) calibration of survey instruments.
  - Provide the name of the company performing the calibrations.
- Commit to perform and maintain surveys in accordance with NAC 459.7725 and NAC 459.733.

**Dosimetry Policy& Procedure**

- Provide the name of your dosimetry provider (must be NVLAP approved) and list the exchange frequency.
- Commit to maintaining control badges for accurate dose assessment.
- Commit to and submit instructions for personnel to wear their personnel dosimeters while working with well logging sources and performing maintenance.
- Provide the following for the use of unsealed sources:
  - Commit to develop, maintain, and implement a bioassay program when using unsealed radioactive tracer materials as recommended in NRC Regulatory Guide 8.20, "Applications of Bioassay for Radioiodine," 8.32, "Criteria for Establishing a Tritium Bioassay Program," or other appropriate NRC Regulator Guide."

**OR**

- Commit that the licensee will contract with a vendor for bioassay services and confirm that the vendor is licensed or otherwise authorized by the RCP, the NRC, or another agreement state to provide the required bioassay services.

**OR**

- Commit that the licensee will not allow any individual to use more than (1) 50 millicurie (mCi) (1.85 Gigabecquerel (GBq) of Iodine – 131 (I-131) at any one time or in any 5- day period at field station or at temporary job sites, (2) more than 0.1 Curie (Ci) 3.7 GBq) of Hydrogen – 3 (H-3)(Tritium) or more than 100 Ci (3700 GBq) of gaseous H-3.
- Commit to maintain the dosimetry and/or bioassay records until the RCP authorizes disposition of the records.

**Inventory Policy & Procedure**

- Commit that all sealed sources (other than gaseous source) used in well logging operations comply with the requirements specified in NAC 459.765 1. And NAC 459.7685.
- Submit a current inventory (prospective inventory if a new license (may not have all information available)) with the date and RSO initials, the manufacturer, model no. & serial no. for each gauge or portable gauge, nuclide and activity of each sealed source, and the current location.

□ **Inventory Policy & Procedure (continued)**

- Commit to leak testing energy compensating sources (ECS) if greater than 100 microcuries ( $\mu\text{Ci}$ ) at an interval not to exceed three years and to inventory ECS at least every six months.
  - Commit to maintaining the ECS inventory and leak test records in accordance with 10 CFR 39.37 and 39.39 respectively.
- Commit to performing and documenting a physical inventory every 6 months of all licensed materials and waste.
  - Commit to maintain records for no less than three years.
- Commit to maintain records of source of radiation used in well logging operations per NAC 459.7681
  - Commit to maintain these records for no less than three years.
- Commit to Leak Testing at an interval not to exceed six months, and maintain records per NAC 459.767.
  - Submit the following as applicable:
    - The name of the company supplying kits and analyzing the leak tests.
    - If self-analyzed, procedures for analysis.
    - List of Users to perform leak tests other than the RSO, and submit their training.

□ **Maintenance Policy & Procedure**

- Commit that before each use a visual inspection will be conducted and records maintained in accordance with NAC 459.7665 to ensure well logging equipment is in good working condition and is labeled as required.
  - Submit the procedures for conducting pre-use visual inspections
  - Commit to maintaining the records of inspections for no less than three years.
- Commit that semiannual visual inspections and routine maintenance will be conducted and records maintained in accordance with NAC 459.7665 to ensure required labeling is legible and that no physical damage is visible.
  - Submit the procedures for conducting semiannual visual inspections
  - Commit to maintaining the records of inspections for no less than three years.



**☐ Maintenance Policy & Procedure (continued)**

- ☐ Commit that activities described in NAC 459.7665 8. & 9. will not be conducted unless detailed written procedures have been approved the RCP.

**OR**

- ☐ Submit detailed procedures for any activities described in NAC 459.7665 8. & 9., including radiation safety precautions that individuals will be expected to follow when performing these tasks and the minimum qualifications of these individuals. Each different task must be described. Should a procedure require the removal of the sealed source from the holder before performing any maintenance on the holder, applicants should describe the removal procedures

**☐ Operating and Incident Response Policy & Procedures**

- ☐ Commit to an annual audit/review of the radiation safety program and maintain records for no less than three (3) years.
- ☐ Commit to not using sealed sources and/or neutron generators for conducting well logging operations in a well that penetrates a freshwater aquifer if the well does not have surface casing, or if the well has a surface casing that does not isolate the freshwater aquifer from the well.
- ☐ Commit to not using sealed sources in any well that is producing water for human or animal consumption, or for irrigation purposes.
- ☐ Commit that the licensee will not release any tracer radioactive materials in a well unless a written authorization has been obtained from the RCP for each specific operation.
- ☐ Provide the following commitments or procedures as applicable
  - ☐ Submit step by step procedures for use of the well logging equipment including all operations for installing and removing sources.
  - ☐ Submit procedures for drill to stop well logging operations.
  - ☐ Submit operating and emergency procedures for drilling/measuring while logging operations.
  - ☐ Commit that the licensee will not perform tracer studies in single well applications

**OR**

- ☐ Submit step-by-step operating and emergency procedures for conducting tracer studies in single well applications that meet the criteria in Section 8.10.13.1 of NUREG-1556, Volume 14, current revision, "Consolidated Guidance About Materials Licenses: Program-Specific Guidance About Well Logging, Tracer, and Field Flood Study Licenses," 10 CFR 39.45, and 10 CFR 39.63."

□ **Operating and Incident Response Policy & Procedures**

- Commit that the licensee will not perform Field Flood studies.

**OR**

- Submit step-by-step procedures and information required in Section 8.10.13.2 and Appendix D, "Field Flood Studies/Enhanced Recovery of Oil and Gas Wells" of NUREG-1556, Volume 14, current revision, "Consolidated Guidance About Materials Licenses: Program-Specific Guidance About Well Logging, Tracer, and Field Flood Study Licenses."
- Commit that the licensee will not knowingly inject tracer materials into a freshwater aquifer.

**OR**

- Request authorization in writing to inject tracer material into a freshwater aquifer involving secondary and tertiary oil and gas recovery and have submitted our reasons for performing the study and procedures to safeguard the public, licensee personnel, and the environment, and will provide an environmental report containing the information outlined in 10 CFR 51.45, "Environmental report."
- Commit that the licensee will not perform frac-tagging operations.

**OR**

- Submit step-by-step operating and emergency procedures that include the following:
  - Receiving, controlling, and handling tracer material during well injections.
  - Handling, controlling and disposing of any unused tracer materials.
  - Securing, maintaining control, and posting of areas involved with frac-tagging operations using radioactive materials.
  - Containment and/or decontamination of a spill or "sandout" (or "fluid reversal") involving tracer material during frac sand operations. The procedure includes, among other items, radiation surveys, licensee contact information, steps to be taken by the licensee and the client in the event that a "sandout" (or "fluid reversal") occurs when the licensee has already left the client's site, and steps to be taken by the licensee and the client to evaluate flowback or production wastes for the presence of tracer material.

□ **Operating and Incident Response Policy & Procedures (continued)**

- Disposal of radioactive materials resulting from frac-tagging operations (such as a sandout, fluid reversal, or flowback) at (i) a licensed low level radioactive waste disposal facility; (ii) decay-in-storage using holding tanks and subsequent unrestricted release; or (iii) a request for alternate waste disposal under 10 CFR 20.2002, "Method for obtaining approval of proposed disposal procedures." The procedure includes a description of who will be responsible for the disposal of radioactive materials resulting from frac-tagging operations occurring at client's facilities, and the method for making a determination of the concentration of licensed material (picocuries/gram) in these operations.
- Actions to be taken in the event of an explosion, leak and contamination event and the incapacitation of a lone well logging supervisor.
- Commit that the licensee will not use neutron generators (accelerators) in well logging operations.

**OR**

- Commit to the use of neutron generators (accelerators) in accordance with the guidance in Section 8.10.15 of NUREG-1556, Volume 14, current revision, "Consolidated Guidance About Materials Licenses: Program-Specific Guidance About Well Logging, Tracer, and Field Flood Study Licenses" and provide step-by-step operating and emergency procedures for RCP review. Calibration of neutron generators will be performed by an RCP, NRC, or another Agreement State licensee that is specifically authorized to conduct this activity."

**OR**

- Commit to the use of neutron generators (accelerators) in accordance with the guidance in Section 8.10.15 of NUREG-1556, Volume 14, current revision, "Consolidated Guidance About Materials Licenses: Program-Specific Guidance About Well Logging, Tracer, and Field Flood Study Licenses" and will provide step-by-step operating and emergency procedures for RCP review. We will perform calibration of neutron generators and will provide step-by-step procedures for conducting calibration of neutron generators for RCP review."

**AND**

- Commit that a licensee/registrant will not activate a radiation machine used in a well logging operation so that it emits radiation, unless the radiation machine is in the well and at least 10 feet below the surface of the ground.

□ **Operating and Incident Response Policy & Procedures (continued)**

- Commit that the licensee will not use depleted uranium sinker bars in their well logging operations

**OR**

- Commit that Depleted uranium sinker bars will be obtained under the provisions of a general license per NAC 459.212.

**OR**

- Commit that depleted uranium sinker bars will be obtained under a specific license and include the number of kilograms of material being requested in the materials section of the application.

**AND**

- Commit that Uranium sinker bars will be possessed and inspected as specified in Section 8.10.16 in NUREG-1556, Volume 14, Current Revision, "Consolidated Guidance About Materials Licenses: Program-Specific Guidance About Well Logging, Tracer, and Field Flood Study Licenses.
- Commit that any Uranium sinker bar be marked in accordance with NAC 459.7695 3.
- Commit to the use of radioactive markers where each individual marker contains only quantities of licensed material not exceeding the exempt quantities identifying in NAC 459.188.
- Submit the reporting requirements and procedures for workers to use in case of incidents involving damage, theft or loss.
- Include the contact information for those who should be notified (cell, office phone, fax & email)

Include Nevada RCP- contact numbers

Radiation Control Program (8:00AM–5:00PM M-F)	(775) 687-7550
Radiation Control Program 24 hr Emergency Number	(877) 438-7231
Nevada Highway Patrol (24 hrs)	(775) 687-0400

- Commit that well logging sources will be used, transported, and stored in such a way that members of the public will not receive more than 100 millirem (mrem) in one year, and the dose in any unrestricted area will not exceed 2 mrem in any one hour from licensed operations.
- Commit to providing the information required per NAC 459.7641 2. to the RCP at least three days prior to conducting well logging operations and maintain a record of this information for at least three years.

**Well Logging Source Transportation Policy & procedures**

- Submit procedures for temporary job site and storage of the well logging sources
- Describe the two independent physical controls that form tangible barriers used to secure the well logging sources from unauthorized removal.
- Submit procedures for transportation of the well logging sources. A detailed description of how the well logging source(s) is secured for transportation. Pictures may be submitted.
- Commit that all well logging sources will be transported in accordance with U.S. DOT regulations (49 CFR).
- Commit that at least one member of the well logging crew will have current HAZMAT training prior to transporting RAM.

**Disposal Policy& Procedure**

- Commit that the licensee will use sealed and/or unsealed radioactive materials with a half-life greater than 120 days and will transfer or dispose of the material and contaminated waste to a licensed entity authorized to receive the material.”
  - Submit procedures for disposal of radioactive materials.
- If materials will be used with a half-life less than 120 days provide procedures for decay in storage and disposal.
- Commit to maintain records of receipt, transfer, and disposal of all sealed sources and portable gauges received and possessed under the license until the license is terminated by the RCP.
- Commit that license termination will be conducted in compliance with Nevada Administrative Code (NAC 459.200).

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## **Checklist for 10 CFR Part 37**

**Submit 1 copy only. Number all pages sequentially that are submitted for review**

- Properly mark all appropriate information “Official Use Only – Security-Related Information”
- If there is proprietary information, please mark these pages to prevent public release
- Review the 10 CFR 37 and NUREG 2155 as guidance to complete this checklist
- Submit all Policy and Procedures to the Nevada Radiation Control Program  
<http://www.nrc.gov/reading-rm/doc-collections/nuregs/staff/sr2155/>
- Personnel Access Authorization: 10 CFR 37 Subpart B
  - Submit the name and title of the Reviewing Official (RO)
  - Develop, implement, and maintain an Access Authorization Program per 10 CFR 37.23
    - Submit the Access Authorization Program per 10 CFR 37.23
  - Commit to reviewing this program every 12 months, and maintaining these records for three years

- Personnel Access Authorization: 10 CFR 37 Subpart B (continued)
  - Commit to maintain a list of approved individuals with unescorted access &/or access to Safeguards Information per 10 CFR 37.23
  - Commit to maintaining these unescorted access lists for three years after being superseded or replaced
- Physical Protection Requirements during use: Subpart C
  - Develop, implement, maintain a security program per 10 CFR 37.41
    - Submit the security program per 10 CFR 37.41
  - Commit to reviewing the following every 12 months 10 CFR 37.55
    - Current security plan
    - Initial & refresher training on the security program, and
    - Implementation procedures
- Commit to developing and maintaining written procedures that document how the security plan will be met
- Commit to performing initial and refresher security training every 12 months
- Commit to maintaining the following for three years after being superseded or replaced
- Current & previous security plan
  - Initial & refresher training on the security program, and
  - Implementation procedures
- Commit to LLEA coordination, updating every 12 months & maintain for 3 years per 10 CFR 37.45
- Commit to developing, implementing & maintaining security zones per 10 CFR 37.47
- Commit to monitoring and detecting all entries into the security zones per 10 CFR 37.49
- Commit to a maintenance and testing program per 10 CFR 37.51
- Commit to requirements for mobile devices per 10 CFR 37.53 (if applicable)
- Commit to Event Reporting per 10 CFR 37.57
- Physical Protection in Transit: Subpart D
  - Commit to using the NRC License Verification System (LVS) or contacting the licensing agency prior to shipping Category 1 or 2 quantities to any other licensee per 10 CFR 37.71 to 37.79
  - Commit to maintaining the verifications for three years
  - Commit to implementing the Reporting of Events to LLEA, RCP, and the NRC per 10 CFR 37.81

**CERTIFICATION**

The Applicant understands that all commitments that are marked above are binding and considered part of the license application; if not applicable, DO NOT mark. All applicable items that require submission must accompany the application, license fee and this checklist

\_\_\_\_\_  
CERTIFYING OFFICER – **PRINTED NAME**

\_\_\_\_\_  
**TITLE**

\_\_\_\_\_  
**SIGNATURE**

\_\_\_\_\_  
**DATE**