

RE: Transfer of sealed sources
License number ~~37-3038-01~~ 37-30381-01 NMSB3
Docket number 030-34401/29-30278-01 NMS

March 29, 2006

Nuclear Regulatory Commission
Division of Nuclear Material Safety
Nuclear Materials Branch 2
Region 1
475 Allendale Road
King Of Prussia, PA. 1906-1415

RECEIVED
REGION 1
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To Whom it may concern:

This letter is to inform the NRC about sealed source Transfers of Ownership from ConocoPhillips Trainer Refinery to the following:

1. QSA Global, one (1) Gammatron, Inc. / Texas Nuclear Model AN-HP Source Holder containing 200 mCi (7.40 GBq) of Americium-241, serial number F-32.

The attached letters of Transfer of Ownership from QSA Global dated February 28, 2006 and the Ohmart/Vega letter dated March 2, 2006 confirms the above notification 1.

2. Ohmart/Vega Corporation, four (4) Kay Ray Cesium 137 sealed sources, 100 mCi (3.7 GBq) each, source holder model 7080, source serial numbers 991-3A, 991-3B, 991-3C and 991-3D.

The attached letter of Transfer of Ownership from Ohmart/Vega Corporation dated March 23, 2006 confirms the above notification 2.

The following additional attachments are being provided for your reference to this letter and include:

- A copy of our current license
- Leak Test Report from Ohmart/Vega dated February 24, 2006
- Leak Test Report from Ohmart/Vega dated March 23, 2006.

ConocoPhillips Trainer Refinery is requesting our current License number 37-30381-01 be amended to reflect the Transfers of Ownership referenced above.

The request for changes to the ConocoPhillips current license are the following:

Section 6.B (Americium241) 7.B and 8.B, be deleted from our current license
Section 7.A Kay-Ray Model 7700 Series be deleted from our current license.

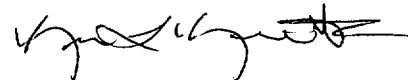
All other conditions and requirements on our current license will remain the same. The transfers and amendment requests stated above will not affect ConocoPhillips Trainer Refinery's current

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policies or procedures to maintain strict adherence to the provisions of our current license and the regulations of the United States Nuclear Regulatory Commission.

Please contact Mary Wiggins, RSO, at (610) 364-8247 with questions or concerns.

Sincerely,



Ken L. Kerntke
Health, Safety and Environmental Manager
ConocoPhillips
Trainer Refinery

File: HSE 250-2006-001

M. Wiggins (RC) w/attachments

J. E. Peace w/o attachments



Ohmart/VEGA Corporation
4170 Rosslyn Drive
Cincinnati, Ohio 45209-1183
USA

(800) FOR LEVEL Toll-Free in USA & Canada
(513) 272.0131 Telephone
(513) 272.0133 FAX

<http://www.ohmartvega.com> URL
info@ohmartvega.com E-mail

March 23, 2006

Mary Wiggins
Conoco Phillips
4101 Post Road
Trainer, PA 11730

Re: Your P.O. 3845128
Ohmart C.O. 6066991/4323

Ms. Wiggins:

This is to acknowledge the receipt of the following:

Four (4) KayRay Model 7080 source holders, each 100 mCi (3.70 GBq) Cesium-137, serial numbers 9913A, 9913B, 9913C, and 9913D.

This shipment was received on March 17, 2006 referencing Ohmart MRA # 11730.

We accept this material and the transfer of ownership to Ohmart. We will handle it in strict accordance with the provisions of our license, with the regulations of the U.S. Nuclear Regulatory Commission, the regulations of the U.S. Department of Transportation and any other applicable laws or regulations.

If you have any additional questions, please do not hesitate to contact us.

Sincerely,

A handwritten signature in cursive script that reads "Candy Brock".

Candy Brock
Customer Support Manager
Field Service Department

Ohmart's State of Ohio License Number 03212310036

c: File

Ohmart/VEGA Corp.

4241 Allendorf Drive
Cincinnati, OH 45209
Phone (513) 272-0131 Fax (513) 272-0133

Leak Test Report

Customer Information:

Mary Wiggins
Conoco -Phillips
4101 Post Road
Trainer, PA 19061

Original SO/CO: KayRay
Source Holder: 7080
Customer Tag # : Removed from service.
Test Performed On: 3/15/2006

Test Information:

Analyzed By: Mark Cornelissen Testing Interval:
Equipment #: NS-0012 Next Test Due:
Calibration Due: 1/27/2007 Analysis Date: 3/23/2006
Result OK: ☒ (Activity less than 0.005 (μ Ci) [200Bq]
Defective: ☐

Measurement Data:

Leak Test CPM: 15
Background CPM: 16

Source Serial #:	Isotope:	mCi	GBq
9913-D	Cs-137	100	3.7

Ohmart/VEGA's leak test analysis is done per work instruction NSI-0006 in compliance with Ohio DOH License 03212310036.

Mark A. Cornelissen

Mark Cornelissen

3-23-06

Date

Ohmart/VEGA Corp.

4241 Allendorf Drive
Cincinnati, OH 45209
Phone (513) 272-0131 Fax (513) 272-0133

Leak Test Report

Customer Information:

Mary Wiggins
Conoco -Phillips
4101 Post Road
Trainer, PA 19061

Original SO/CO: KayRay
Source Holder: 7080
Customer Tag # : Removed from service.
Test Performed On: 3/15/2006

Test Information:

Analyzed By: Mark Cornelissen Testing Interval:
Equipment #: NS-0012 Next Test Due:
Calibration Due: 1/27/2007 Analysis Date: 3/23/2006
Result OK: ☒ (Activity less than 0.005 (μ Ci) [200Bq]
Defective: ☐

Measurement Data:

Leak Test CPM: 15
Background CPM: 16

Source Serial #:	Isotope:	mCi	GBq
9913-C	Cs-137	100	3.7

Ohmart/VEGA's leak test analysis is done per work instruction NSI-0006 in compliance with Ohio DOH License 03212310036.

Mark A. Corn

Mark Cornelissen

3.23.06

Date

Ohmart/VEGA Corp.

4241 Allendorf Drive
Cincinnati, OH 45209
Phone (513) 272-0131 Fax (513) 272-0133

Leak Test Report

Customer Information:

Mary Wiggins
Conoco -Phillips
4101 Post Road
Trainer, PA 19061

Original SO/CO: KayRay
Source Holder: 7080
Customer Tag # : Removed from service.
Test Performed On: 3/15/2006

Test Information:

Analyzed By: Mark Cornelissen Testing Interval:
Equipment #: NS-0012 Next Test Due:
Calibration Due: 1/27/2007 Analysis Date: 3/23/2006
Result OK: ☒ (Activity less than 0.005 (μ Ci) [200Bq]
Defective: ☐

Measurement Data:

Leak Test CPM: 15
Background CPM: 16

Source Serial #:	Isotope:	mCi	GBq
9913-B	Cs-137	100	3.7

Ohmart/VEGA's leak test analysis is done per work instruction NSI-0006 in compliance with Ohio DOH License 03212310036.

Mark A. Corni

Mark Cornelissen

3.23.06

Date

Ohmart/VEGA Corp.

4241 Allendorf Drive
Cincinnati, OH 45209
Phone (513) 272-0131 Fax (513) 272-0133

Leak Test Report

Customer Information:

Mary Wiggins
Conoco -Phillips
4101 Post Road
Trainer, PA 19061

Original SO/CO: KayRay
Source Holder: 7080
Customer Tag #: Removed from service.
Test Performed On: 3/15/2006

Test Information:

Analyzed By: Mark Cornelissen Testing Interval:
Equipment #: NS-0012 Next Test Due:
Calibration Due: 1/27/2007 Analysis Date: 3/23/2006
Result OK: ☒ (Activity less than 0.005 (μ Ci) [200Bq]
Defective: ☐

Measurement Data:

Leak Test CPM: 15
Background CPM: 16

Source Serial #:	Isotope:	mCi	GBq
9913-A	Cs-137	100	3.7

Ohmart/VEGA's leak test analysis is done per work instruction NSI-0006 in compliance with Ohio DOH License 03212310036.

Mark A. Cornin

Mark Cornelissen

3.23.06

Date



QSA GLOBAL

6765 Langley Drive
Baton Rouge, Louisiana 70809
Telephone: 225-751-5893
Fax: 225-756-0365

Date: February 28, 2006

Candy Brock
Ohmart/Vega Corporation
4241 Allendorf Drive
Cincinnati, OH 45209

Reference: 2006-011

This is to advise that the Radioactive Material as detailed below has been received by QSA Global, Inc as of February 27, 2006 and we have taken possession of this source:

Manufacturer	Model	Source S/N	Isotope	Activity
Gammatron, Inc/ Texas Nuclear	AN-HP	F-32	Am-241	200 mci

Please retain this record for your files. Should you require further assistance, please contact us at QSA Global, Inc.

Regards,

A handwritten signature in cursive script that reads "Rusty Barrett".

Rusty Barrett
Technical Service Manager



Ohmart/VEGA Corporation
4170 Rosslyn Drive
Cincinnati, Ohio 45209-1183
USA

(800) FOR LEVEL Toll-Free in USA & Canada
(513) 272.0131 Telephone
(513) 272.0133 FAX

<http://www.ohmartvega.com> URL
info@ohmartvega.com E-mail

March 02, 2006

Mary Wiggins
Conoco/Phillips 66
4101 Post Road
Trainer, PA 19061

Re: Your P.O. #4505988176
Ohmart C.O. 6065149

Ms. Wiggins:

This is to acknowledge the receipt of the following:

One (1) Gammatron, Inc./Texas Nuclear Model AN-HP source holder containing 200 mCi
(7.40 GBq) Americium-241, serial number F-32.

This shipment was received by QSA Global in Baton Rouge, LA.

QSA Global has accepted this material and the transfer of ownership to them. They will handle it in strict accordance with the provisions of their license, with the regulations of the U.S. Nuclear Regulatory Commission, the regulations of the U.S. Department of Transportation and any other applicable laws or regulations.

If you have any additional questions, please do not hesitate to contact us.

Sincerely,

A handwritten signature in cursive script that reads "Candy Brock".

Candy Brock
Customer Support Manager
Field Service Department

Ohmart's State of Ohio License Number 03212310036

c: File

Ohmart/VEGA Corp.

4241 Allendorf Drive
Cincinnati, OH 45209
Phone (513) 272-0131 Fax (513) 272-0133

Leak Test Report

Customer Information:

Mary Wiggins
Conoco -Phillips
4101 Post Road
Trainer, PA 19061

Original SO/CO: Unknown
Source Holder: D220
Customer Tag # : Safety department
Test Performed On: 2/22/2006

Test Information:

Analyzed By: David Brink Testing Interval:
Equipment #: NS-0012 Next Test Due:
Calibration Due: 1/27/2007 Analysis Date: 2/24/2006
Result OK: ☒ (Activity less than 0.005 (μ Ci) [200Bq]
Defective: ☐

Measurement Data:

Leak Test CPM: 17
Background CPM: 16

Source Serial #:	Isotope:	mCi	GBq
F-32	Am-241	200	7.4

Ohmart/VEGA's leak test analysis is done per work instruction NSI-0006 in compliance with Ohio DOH License 03212310036.


David Brink

2-24-2006
Date

MATERIALS LICENSE

Pursuant to the Atomic Energy Act of 1954, as amended, the Energy Reorganization Act of 1974 (Public Law 93-438), and Title 10, Code of Federal Regulations, Chapter I, Parts 30, 31, 32, 33, 34, 35, 36, 39, 40, and 70, and in reliance on statements and representations heretofore made by the licensee, a license is hereby issued authorizing the licensee to receive, acquire, possess, and transfer byproduct, source, and special nuclear material designated below; to use such material for the purpose(s) and at the place(s) designated below; to deliver or transfer such material to persons authorized to receive it in accordance with the regulations of the applicable Part(s). This license shall be deemed to contain the conditions specified in Section 183 of the Atomic Energy Act of 1954, as amended, and is subject to all applicable rules, regulations, and orders of the Nuclear Regulatory Commission now or hereafter in effect and to any conditions specified below.

<p>Licensee</p> <p>1. ConocoPhillips</p> <p>2. 4101 Post Road Trainer, Pennsylvania 19061</p>	<p>In accordance with letter received on December 31, 2002,</p> <p>3. License number 37-30381-01 is amended in its entirety to read as follows:</p> <p>4. Expiration date October 31, 2011</p> <p>5. Docket No. 030-34401/29-30278-01 Reference No.</p>
<p>6. Byproduct, source, and/or special nuclear material</p> <p>A. Cesium 137</p> <p>B. Americum 241</p>	<p>7. Chemical and/or physical form</p> <p>A. Sealed sources (Ohmart Drawing No. A-2102 and Kay-Ray Model 7700 Series)</p> <p>B. Sealed neutron source (Gammatron, Inc. Model No. AN-HP)</p> <p>8. Maximum amount that licensee may possess at any one time under this license</p> <p>A. No single source to exceed the maximum activity specified in the certificate of registration issued by the U.S. Nuclear Regulatory Commission or an Agreement State</p> <p>B. No single source to exceed the maximum activity specified in the certificate of registration issued by the U.S. Nuclear Regulatory Commission or an Agreement State</p>
<p>9. Authorized use:</p> <p>A. To be used, for level measurement in fixed gauging devices that have been registered either with the U.S. Nuclear Regulatory Commission under 10 CFR 32.210 or with an Agreement State and have been distributed in accordance with a Commission or Agreement State specific license authorizing distribution to persons specifically authorized by a Commission or Agreement State license to receive, possess, and use the devices.</p> <p>B. For use in Fisher Controls LLD 2220 neutron backscatter device.</p>	

**MATERIALS LICENSE
SUPPLEMENTARY SHEET**

License Number

37-30381-01

Docket or Reference Number

030-34401/29-30278-01

Amendment No. 02

CONDITIONS

10. Licensed material may be used or stored only at the licensee's facilities located at the licensee's facilities located at 4101 Post Road, Trainer, Pennsylvania.
11. Licensed material shall be used by, or under the supervision of, Mary Wiggins, or William Carnall.
12. The Radiation Safety Officer for this license is Mary Wiggins.
13. In addition to the possession limits in Item 8, the licensee shall further restrict the possession of licensed material to quantities below the minimum limit specified in 10 CFR 30.35(d), 40.36(b), and 70.25(d) for establishing financial assurance for decommissioning.
14. A. Sealed sources shall be tested for leakage and/or contamination at intervals not to exceed the intervals specified in the certificate of registration issued by the U.S. Nuclear Regulatory Commission under 10 CFR 32.210 or under equivalent regulations of an Agreement State.
- B. In the absence of a certificate from a transferor indicating that a leak test has been made within the intervals specified in the certificate of registration issued by the U.S. Nuclear Regulatory Commission under 10 CFR 32.210 or under equivalent regulations of an Agreement State, prior to the transfer, a sealed source received from another person shall not be put into use until tested and the test results received.
- C. Sealed sources need not be tested if they are in storage and are not being used; however, when they are removed from storage for use or transferred to another person and have not been tested within the required leak test interval, they shall be tested before use or transfer. No sealed source shall be stored for a period of more than 10 years without being tested for leakage and/or contamination.
- D. The leak test shall be capable of detecting the presence of 0.005 microcurie (185 becquerels) of radioactive material on the test sample. If the test reveals the presence of 0.005 microcurie (185 becquerels) or more of removable contamination, a report shall be filed with the U.S. Nuclear Regulatory Commission in accordance with 10 CFR 30.50(c)(2), and the source shall be removed immediately from service and decontaminated, repaired, or disposed of in accordance with Commission regulations.
- E. Tests for leakage and/or contamination, limited to leak test sample collection, shall be performed by the licensee or by other persons specifically licensed by the U.S. Nuclear Regulatory Commission or an Agreement State to perform such services. The licensee is not authorized to perform the analysis; analysis of leak test samples must be performed by persons specifically licensed by U.S. Nuclear Regulatory Commission or an Agreement State to perform such services.

**MATERIALS LICENSE
SUPPLEMENTARY SHEET**

License Number

37-30381-01

Docket or Reference Number

030-34401/29-30278-01

Amendment No. 02

15. Sealed sources or detector cells containing licensed material shall not be opened or sources removed from source holders by the licensee.
16. The licensee shall conduct a physical inventory every six months, or at other interval approved by the U.S. Nuclear Regulatory Commission, to account for all sealed sources and/or devices received and possessed under the license.
17. A. Each gauge shall be tested for the proper operation of the on-off mechanism (shutter) and indicator, if any, at intervals not to exceed 6 months or at such longer intervals as specified in the certificate of registration issued by the U.S. Nuclear Regulatory Commission pursuant to 10 CFR 32.210 or the equivalent regulations of an Agreement State.
- B. Notwithstanding the periodic on-off mechanism (shutter) and indicator test, the requirement does not apply to gauges that are stored, not being used, and have the shutter lock mechanism in a locked position. The gauges exempted from this periodic test shall be tested before use.
18. The following services shall not be performed by the licensee: installation, initial radiation surveys, relocation, removal from service, dismantling, alignment, replacement, disposal of the sealed source and non-routine maintenance or repair of components related to the radiological safety of the gauge (i.e., the sealed source, the source holder, source drive mechanism, on-off mechanism (shutter), shutter control, shielding). These services shall be performed only by persons specifically licensed by the U.S. Nuclear Regulatory Commission or an Agreement State to perform such services.
19. Prior to initial use and after installation, relocation, dismantling, alignment, or any other activity involving the source or removal of the shielding, the licensee shall assure that a radiological survey is performed to determine radiation levels in accessible areas around, above and below the gauge with the shutter open. This survey shall be performed only by persons authorized to perform such services by the U.S. Nuclear Regulatory Commission or an Agreement State.
20. The licensee may initially mount a gauge if permitted by the certificate of registration issued by the U.S. Nuclear Regulatory Commission or an Agreement State and under the following conditions:
- A. The gauge must be mounted in accordance with written instructions provided by the manufacturer;
- B. The gauge must be mounted in a location compatible with the "Conditions of Normal Use" and "Limitations and/or Other Considerations of Use" in the certificate of registration issued by the U.S. Nuclear Regulatory Commission or an Agreement State;
- C. The on-off mechanism (shutter) must be locked in the off position, if applicable, or the source must be otherwise fully shielded;

**MATERIALS LICENSE
SUPPLEMENTARY SHEET**

License Number

37-30381-01

Docket or Reference Number

030-34401/29-30278-01

Amendment No. 02

D. The gauge must be received in good condition (i.e., package was not damaged); and

E. The gauge must not require any modification to fit in the proposed location.

Mounting does not include electrical connection, activation or operation of the gauge. The source must remain fully shielded and the gauge may not be used until it is installed and made operational by a person specifically licensed by the U.S. Nuclear Regulatory Commission or an Agreement State to perform such operations.

21. A. The licensee may maintain, repair, or replace device components that are not related to the radiological safety of the device and that do not result in the potential for any portion of the body to come into contact with the primary beam or in increased radiation levels in accessible areas.
- B. The licensee may not maintain, repair, or replace any of the following device components: the sealed source, the source holder, source drive mechanism, on-off mechanism (shutter), shutter control, or shielding, or any other component related to the radiological safety of the device, except as provided otherwise by specific condition of this license.
22. The licensee shall operate each device containing licensed material within the manufacturer's specified temperature and environmental limits such that the shielding and shutter mechanism of the source holder are not compromised.
23. The licensee shall assure that the shutter mechanism, for each device containing licensed material, is locked in the closed position during periods when a portion of an individual's body may be subject to the direct radiation beam. The licensee shall review and modify, as appropriate, its "lock-out" procedures whenever a new device is obtained to incorporate the device manufacturer's recommendations.
24. The licensee is authorized to transport licensed material in accordance with the provisions of 10 CFR Part 71, "Packaging and Transportation of Radioactive Material."

**MATERIALS LICENSE
SUPPLEMENTARY SHEET**

License Number

37-30381-01

Docket or Reference Number

030-34401/29-30278-01

Amendment No. 02

25. Except as specifically provided otherwise in this license, the licensee shall conduct its program in accordance with the statements, representations, and procedures contained in the documents, including any enclosures, listed below. The U.S. Nuclear Regulatory Commission's regulations shall govern unless the statements, representations, and procedures in the licensee's application and correspondence are more restrictive than the regulations.

- A. Letter dated August 30, 2001
- B. Letter dated September 6, 2001
- C. Letter dated September 21, 2001
- D. Letter dated October 15, 2001
- E. Letter dated January 3, 2003



For the U.S. Nuclear Regulatory Commission

Original signed by Sattar Lodhi, Ph.D.Date January 8, 2003 2003

By

Sattar Lodhi, Ph.D.
Nuclear Materials Safety Branch 2
Division of Nuclear Materials Safety
Region I
King of Prussia, Pennsylvania 19406

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This is to acknowledge the receipt of your letter/application dated

3/29/2006, and to inform you that the initial processing which includes an administrative review has been performed.

☒ AMEND. 37-30381-C1
There were no administrative omissions. Your application was assigned to a technical reviewer. Please note that the technical review may identify additional omissions or require additional information.

☐ Please provide to this office within 30 days of your receipt of this card

A copy of your action has been forwarded to our License Fee & Accounts Receivable Branch, who will contact you separately if there is a fee issue involved.

Your action has been assigned Mail Control Number 138647.
When calling to inquire about this action, please refer to this control number.
You may call us on (610) 337-5398, or 337-5260.