



P7

March 19, 2013

Mr. John Miller  
Licensing Assistance Team  
Division of Nuclear Materials Safety  
U.S. Nuclear Regulatory Commission  
Region I DNMS  
2100 Renaissance Blvd.  
King of Prussia, PA 19406

06-30764-02MD  
03036179 579387

Renewal of License **06-30764-02MD**  
(Current Amendment No. 11) Docket No. 030 -36179  
Renewal of License **06-30764-01**  
(Current Amendment No. 15) Docket No. 030- 36099

06-30764-01  
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Dear Mr. Miller

We are providing the following information requested

**1. Explanation of Non-Sterile Labeling**

Many facilities request that non-sterile seeds accompany our cases.  
The extra seeds are primarily used for additional assay testing.  
The seed manufacturer provides these in *their* labeled pig.  
We place the pig in a bag and seal the bag. Our Non Sterile label is applied to the bag

**2. Contamination Wipes in cpm and dpm**

Biocompatibles has always used **200 dpm** as an Action Limit, when reading wipe Surveys with a Caprac R Unit and continues to do so in our seed receipt and shipment departments.

In December 2011 we implemented wipe measurements with a Caprac T for the Radioactive Lab. The Caprac T Action Limit is 75 net cpm which equates to 200 dpm. The Caprac T does not easily convert to dpm and rather than train our operators in the various steps to determine this value, elected to use a cpm Action Limit. We utilized a broad spectrum conversion factor which rounded off, equates to 75 cpm

Yours truly,

A handwritten signature in black ink, appearing to read "Wayne Richardson", written over a horizontal line.

Wayne Richardson  
Radiation Safety Officer

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