

Br. 2

Licensing Assistant Section  
Nuclear Material Safety Branch  
U.S. Nuclear Regulatory Commission, Region 1  
2100 Renaissance Boulevard, Suite 100  
King of Prussia, PA 19406-2713



ECRG 12.11.18 AM 06:53

Covestro LLC  
17595 Energy Road  
Proctor, WV 26055

Phone  
304-455-4400

Date: 12/5/2018  
Subject: Specific License Termination

To Whom It May Concern,

03014874

I am requesting that the specific-license, 47-06773-02, issued to our site be terminated. We have had all of the Nuclear source gauges listed on the license transferred to another license holder and our Electron Capture Detectors generally licensed.

Please feel free to contact me with any questions or concerns.

Yours Sincerely,

A handwritten signature in black ink that reads "Chuck Klug". The signature is fluid and cursive, with the first name "Chuck" and last name "Klug" clearly distinguishable.

Chuck Klug

RSO / Industrial Hygienist



# **CERTIFICATE OF DISPOSITION OF MATERIALS**

Estimated burden per response to comply with this mandatory collection request: 30 minutes. This submittal is used by NRC as part of the basis for its determination that the facility is released for unrestricted use. Send comments regarding burden estimate to the FOIA, Privacy, and Information Collections Branch (T-5 F53), U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001, or by e-mail to [Infocollections.Resource@nrc.gov](mailto:Infocollections.Resource@nrc.gov), and to the Desk Officer, Office of Information and Regulatory Affairs, NE08-10202, (3150-0028), Office of Management and Budget, Washington, DC 20503. If a means used to impose an information collection does not display a currently valid OMB control number, the NRC may not conduct or sponsor, and a person is not required to respond to, the information collection.

**LICENSEE NAME AND ADDRESS**

1. Covestro LLC  
  
2. 17595 Energy Road  
Proctor, West Virginia 26055

**LICENSE NUMBER**

47-06773-02

**DOCKET NUMBER**

03014874

**LICENSE EXPIRATION DATE**

February 28, 2025

**A. LICENSE STATUS (Check the appropriate box)**

- ☐ This license has expired. ☒ This license has not yet expired; please terminate it.

**B. DISPOSAL OF RADIOACTIVE MATERIAL**

(Check the appropriate boxes and complete as necessary. If additional space is needed, provide attachments)

The licensee, or any individual executing this certificate on behalf of the licensee, certifies that:

- ☐ 1. No radioactive materials have ever been procured or possessed by the licensee under this license.
- ☒ 2. All activities authorized by this license have ceased, and all radioactive materials procured and/or possessed by the licensee under this license number cited above have been disposed of in the following manner.
- ☒ a. Transfer of radioactive materials to the licensee listed below:
- QSA Global
- ☐ b. Disposal of radioactive materials:
- ☐ 1. Directly by the licensee:
- ☐ 2. By licensed disposal site:
- ☐ 3. By waste contractor:
- ☒ c. All radioactive materials have been removed such that any remaining residual radioactivity is within the limits of 10 CFR Part 20, Subpart E, and is ALARA.

**C. SURVEYS PERFORMED AND REPORTED**

- ☒ 1. A radiation survey was conducted by the licensee. The survey confirms:
- ☒ a. the absence of licensed radioactive materials
- ☐ b. that any remaining residual radioactivity is within the limits of 10 CFR 20, Subpart E, and is ALARA.
- ☒ 2. A copy of the radiation survey results:
- ☒ a. is attached; or ☐ b. is not attached (Provide explanation); or ☐ c. was forwarded to NRC on: \_\_\_\_\_ Date \_\_\_\_\_
- ☐ 3. A radiation survey is not required as only sealed sources were ever possessed under this license, and
- ☐ a. The results of the latest leak test are attached; and/or ☐ b. No leaking sources have ever been identified.

The person to be contacted regarding the information provided on this form:

NAME	TITLE	TELEPHONE (Include Area Code)	E-MAIL ADDRESS
Chuck Klug	RSO / Industrial Hygienist	(304) 451-2429	<a href="mailto:chuck.klug@covestro.com">chuck.klug@covestro.com</a>

Mail all future correspondence regarding this license to:

Chuck Klug Covestro LLC 17595 Energy Road Proctor, West Virginia 26066

**C. CERTIFYING OFFICIAL**

I CERTIFY UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT

PRINTED NAME AND TITLE	SIGNATURE	DATE
John C Klug RSO / Industrial Hygienist		12/05/2018

**WARNING: FALSE STATEMENTS IN THIS CERTIFICATE MAY BE SUBJECT TO CIVIL AND/OR CRIMINAL PENALTIES. NRC REGULATIONS REQUIRE THAT SUBMISSIONS TO THE NRC BE COMPLETE AND ACCURATE IN ALL MATERIAL RESPECT. 18 U.S.C. SECTION 1001 MAKES IT A CRIMINAL OFFENSE TO MAKE A WILLFULLY FALSE STATEMENT OR REPRESENTATION TO ANY DEPARTMENT OR AGENCY OF THE UNITED STATES AS TO ANY MATTER WITHIN ITS JURISDICTION.**



2850 Centerville Road  
Wilmington, DE 19808

Chuck Klug,  
C/O Covestro LLC  
17595 Energy Road  
Proctor, WV 26055

December 5, 2018

Reference: General License Model Numbers

Dear Mr. Klug,

Thank you for reaching out to Agilent Technologies, Inc. today seeking information for converting devices on your specific license to general license status.

The devices you provided, as listed below, are posted on our NRC Registry of Radioactive Sealed Sources and Devices number NR-0348-D-111-B. In section MODELS of the registry, they are all listed as Generally Licensed.

Device G-2397A Source Number UO866  
Device G-2397A Source Number UO624  
Device 19233 Source Number ML1058  
Device 19233 Source Number F2019  
Device G-1533A Source Number K3378

Please let me know if we can be of further assistance.

Kind regards,

David S. Bennett  
Radiation Safety Officer  
302-636-8262  
david\_bennett@agilent.com



**QSA GLOBAL**

6765 Langley Drive  
Baton Rouge, Louisiana 70809

Date: March 23, 2018

Chuck Klug  
Covestro, LLC  
17595 Energy Road  
Proctor, WV 26055

MRA # 34451

This is to advise that the Radioactive Material as detailed below has been received by QSA Global, Inc as of 3-23-18 and we have taken possession of this device and source.

Manufacturer	Model	S/N	Isotope	Activity
Thermo Nuclear Technologies	5207	B308	Cs-137	2000 mci
Thermo Nuclear Technologies	5207	B307	Cs-137	2000 mci
Thermo Nuclear Technologies	5207	B306	Cs-137	2000 mci

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

Regards,

Rusty Barrett  
Technical Service Manager

Send all kits and requests to:

**SUNTRAC Services, Inc.**  
**1818 East Main Street**  
**League City, TX 77573**  
**(281) 338-2133**

ATTN: SIT-KIT

CAUTION: Conduct a survey on the outside of each package placed in the U.S. Mails. Any reading over 0.5 mR/hr at contact with the envelope or package shall not be mailed.

### LEAK TEST INVENTORY/REPORT FORM

Company Name: Covestro, LLC (2664)

Address: 17595 Energy Rd. City: Proctor State: WV Zip Code: 26055

Isotope: Cs 137 Activity: 2000 mCi

Source Serial No: N/A

Device ID/Tag No B306

Manufacturer: Texas Nuclear Model No.: 5207

Smear Taken By: S. Conway Leak Test Date: 03/19/18

----- DO NOT WRITE BELOW THIS LINE -----

This is to certify that the above described smear/swab has been assayed at our facilities for indication of source leakage.

Our findings show the leakage to be:

ALPHA	BETA-GAMMA
----	<.0001

µCi (Wet)

Certified By: 

Date: 04/04/18

SUNTRAC Services, Inc. Representative  
(Texas Radioactive License No. L03062)

059418

Send all kits and requests to:

**SUNTRAC Services, Inc.**  
**1818 East Main Street**  
**League City, TX 77573**  
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### LEAK TEST INVENTORY/REPORT FORM

Company Name: Covestro, LLC (2664)

Address: 17595 Energy Rd. City: Proctor State: WV Zip Code: 26055

Isotope: Cs 137 Activity: 2000 mCi

Source Serial No: N/A

Device ID/Tag No B307

Manufacturer: Texas Nuclear Model No.: 5207

Smear Taken By: S. Conway Leak Test Date: 03/19/18

----- DO NOT WRITE BELOW THIS LINE -----

This is to certify that the above described smear/swab has been assayed at our facilities for indication of source leakage.

Our findings show the leakage to be:

ALPHA	BETA-GAMMA
----	<.0001

µCi (Wet)

Certified By: 

Date: 04/04/18

SUNTRAC Services, Inc. Representative  
(Texas Radioactive License No. L03062)

059418

Send all kits and requests to:

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**1818 East Main Street**  
**League City, TX 77573**  
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ATTN: SIT-KIT

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### LEAK TEST INVENTORY/REPORT FORM

Company Name: Covestro, LLC (2664)

Address: 17595 Energy Rd. City: Proctor State: WV Zip Code: 26055

Isotope: Cs 137 Activity: 2000 mCi

Source Serial No: N/A

Device ID/Tag No B308

Manufacturer: Texas Nuclear Model No.: 5207

Smear Taken By: S.Conway Leak Test Date: 03/19/18

----- DO NOT WRITE BELOW THIS LINE -----

This is to certify that the above described smear/swab has been assayed at our facilities for indication of source leakage.

Our findings show the leakage to be:

ALPHA	BETA-GAMMA
----	<.0001

µCi (Wet)

Certified By: 

Date: 04/04/18

SUNTRAC Services, Inc. Representative  
(Texas Radioactive License No. L03062)

059418



## ACKNOWLEDGEMENT - RECEIPT OF CORRESPONDENCE

## Name and Address of Applicant and/or Licensee

Chuck Klug  
Radiation Safety Officer  
Covestro LLC  
17595 Energy Road  
Proctor, West Virginia 26055

## Date

December 19, 2018

## License Number(s)

47-06773-02

## Mail Control Number(s)

610819

## Licensing and/or Technical Reviewer or Branch

Commercial, Industrial, R&amp;D, and Academic Branch

This is to acknowledge receipt of your: ☒ Letter and/or ☐ Application Dated: 12/5/2018

The initial processing, which included an administrative review, has been performed.

☐ Amendment ☒ Termination ☐ New License ☐ Renewal

☒ There were no administrative omissions identified during our initial review.

☐ This is to acknowledge receipt of your application for renewal of the material(s) license identified above. Your application is deemed timely filed, and accordingly, the license will not expire until final action has been taken by this office.

☐ Your application for a new NRC license did not include your taxpayer identification number. Please complete and submit NRC Form 531, Request for Taxpayer Identification Number, located at the following link: <http://www.nrc.gov/reading-rm/doc-collections/forms/nrc531.pdf>  
Follow the instructions on the form for submission.

☐ The following administrative omissions have been identified:

Your application has been assigned the above listed MAIL CONTROL NUMBER. When calling to inquire about this action, please refer to this control number. Your application has been forwarded to a technical reviewer. Please note that the technical review, which is normally completed within 180 days for a renewal application (90 days for all other requests), may identify additional omissions or require additional information. If you have any questions concerning the processing of your application, our contact information is listed below:

Region I  
U. S. Nuclear Regulatory Commission  
Division of Nuclear Materials Safety  
2100 Renaissance Boulevard, Suite 100  
King of Prussia, PA 19406-2713  
(610) 337-5260, (610) 337-5313,  
(610) 337-5398, (610) 337-5239