



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

November 15, 2019

TO: Users of Devices Subject to General License Registration

SUBJECT: ANNUAL REGISTRATION OF GENERALLY LICENSED DEVICES

The U.S. Nuclear Regulatory Commission (NRC) requires annual registration of certain devices that are possessed under the general license issued in Section 31.5 of Title 10 U.S. Code of Federal Regulations (10 CFR 31.5). Devices subject to registration include those containing the radioactive material and activity listed in Table 1 of the attached NRC Form 664. You are receiving this notice because NRC records indicate that you have one or more such devices. Information about the general license registration program is available NRC website at <http://www.nrc.gov/materials/miau/miau-reg-initiatives/gen-license.html>

Note that under 10 CFR 31.5(c)(11), the attached General Licensee Registration Package must be completed, signed, and returned to the NRC within 30 days from the date of this letter. Read all of the instructions prior to completing the package. Mail the completed package in the enclosed envelope to:

Director, Office of Nuclear Material Safety
and Safeguards
ATTN: GLTS
U S. Nuclear Regulatory Commission
Washington DC 20555-0001

Registration Fee: Commission regulations (10 CFR 170.31, Category 3Q) require that you submit a registration fee with each registration on an annual basis. The registration fee is subject to change yearly, and you are required to submit the fee that is in effect as of the date of this letter. An invoice for the current amount due will be sent to you under separate cover. If you have any questions about the fee or the invoice, please contact the License Fee Billing Help Desk at 301-415-7554 or e-mail at fees.resource@nrc.gov.

NRC amended 10 CFR Parts 170.11 and 170.31 to provide that 10 CFR Part 170 fees be assessed to Federal agencies, where applicable, in accordance with the Energy Policy Act of 2005. Therefore, those Federal facilities required to register certain generally licensed devices in their possession will be required to pay the annual registration fee.

Attachment. NRC Form 664 -- General Licensee Registration and Instructions

Sincerely,

Donald B. Lowman

Digitally signed by Donald B. Lowman
Date: 2019.11.07 15:57:36 -05'00'

U.S. Nuclear Regulatory Commission
Office of Nuclear Material Safety and
Safeguards
Division of Material Safety, State, Tribal and
Rulemaking Programs
Materials Safety Licensing and Tribal
Liaison Branch

INSTRUCTIONS FOR COMPLETING NRC FORM 664
"GENERAL LICENSEE REGISTRATION"

Review all six sections of this registration form. If any information is incorrect or missing, make corrections in the applicable boxes. If you have more devices than space provided in the form, **copy the form before starting, as needed.** Use black ink and print in **CAPITAL LETTERS.** Start information in the first box provided. If the information contains a number with a dash (-) or a decimal point (.), include the dash or decimal point as an individual character. Use the "ø" character to represent the number 0 (zero).

Verify information about the devices by reviewing the label on the outside of the device. **For safety reasons, DO NOT TRY TO TAKE APART any device to verify this information.** If you are uncertain how to identify the device's label, contact the device's manufacturer or an authorized service agent for this information. Also, contact the manufacturer for any additional information about NRC requirements. You may also review 10 CFR 31.5 and other applicable regulations on the NRC web site at http://www.nrc.gov/reading_rm/doc_collections/cfr/, or review specific information about the general licensee project at <http://www.nrc.gov/materials/miau/miau-reg-initiatives/gen-license.html>.

Note to specific licensees: If you believe the device(s) listed on the registration form are possessed under your specific license, then verify the device label does not state the device is subject to a general license. If the labels indicate the device is subject to a general license, then complete the registration form as instructed below. If not, complete the registration as instructed below, however, in Section 2, follow the instructions for "not in possession of device" and complete one Section 4 page per device transferred to your specific license.

Section 1 - General Licensee Information. Provide the requested information about you, the general licensee.

On Page 1, provide the street address/location where your device(s) are used. For portable devices, provide the storage location. P.O. Box addresses are not allowed.

Do not write in the box marked **For NRC Use Only.**

On Page 2, provide the name, telephone number, and title of the individual responsible for your device(s), and a mailing address where correspondence about your device(s) can be sent. The mailing address should be specific to the physical location where the devices are used and/or stored (P.O. boxes may be used if this is the only available mailing address). The individual indicated in this section as responsible for your device(s) must also verify and sign the form in Section 5.

Section 2 - Devices Subject to Registration. This section lists each device subject to registration and in your possession, according to NRC records. Devices subject to registration include those containing at least one of the radionuclides listed in Table 1, with the activity indicated, at the time of manufacture.

Table 1. Criteria for Registration

Radionuclide	Activity greater than or equal to:
Strontium-90, Radium-226	3.7 megabecquerel (0.1 millicurie)
Cobalt-60, Curium-244, Americium-241, and Californium-252	37 megabecquerel (1 millicurie)
Cesium-137	370 megabecquerel (10 millicurie)

Use the codes from Table 2 when correcting isotope information for devices in this section. If you do not possess a device on this list, blacken the "not in possession of device" circle, and provide the relevant information in Section 4. Note that each device is assigned a unique six-digit number called the NRC Device Key.

Table 2. Isotope Codes for Sections 2 and 3

Radionuclide	Code for form	Radionuclide	Code for form
Americium-241	AM241	Curium-244	CM244
Californium-252	CF252	Strontium-90	SR90
Cesium-137	CS137	Radium-226	RA226
Cobalt-60	CO60		

Section 3 - Additional Devices. If you have other generally licensed devices (not listed in Section 2) that meet the conditions for registration listed in Table 1, provide information about each additional device. **Before starting, copy this section as needed for your additional devices.** Also indicate how you acquired each device by blackening the proper circle.

When entering isotope and unit information for your device(s), use the codes listed in Table 2 of Section 2 for isotope information, and use the codes from Table 3 for unit information:

Table 3. Unit Codes for Section 3

Unit	Code for form	Unit	Code for form
picocurie	PCI	becquerel	BQ
nanocurie	NCI	kilobecquerel	KBQ
microcurie	UCI	megabecquerel	MBQ
millicurie	MCI	gigabecquerel	GBQ
cure	CI	terabecquerel	TBQ
pound	LB	microgram	UG
		milligram	MG
kilogram	KG	gram	G

Section 4 - Not In Possession of Device. Use this section to report any devices that are listed in Sections 2 or 6, but that you no longer possess. **Before starting, copy this section as needed for additional devices that are not in your possession.** Enter the NRC Device Key, as listed in Section 2 or 6. Blacken the circle (choose only one) that best describes the disposition of the device and complete the rest of the section as appropriate.

Section 5 - Certification and Signature. The responsible individual must certify, sign, and date Section 5.

Section 6 - Devices Not Subject to Registration. This list contains information about devices that NRC records indicate are in your possession, but **are not subject to registration**. If you no longer have one or more of the listed devices, you are required to make a transfer report to NRC in accordance with 10 CFR 31.5(c)(8) or (9), as applicable. You may use Section 4 for this purpose. This section does not list any static eliminators containing polonium-210 (Po-210), or luminous exit signs containing tritium (H-3). These devices are not subject to registration, and are not included in this section in an effort to reduce the length of this form.

RETURN THE COMPLETED FORM IN THE ENCLOSED ENVELOPE WITH PROPER



10 CFR 31.5

PAGE 1 of 2

U.S. NUCLEAR REGULATORY COMMISSION

GENERAL LICENSEE REGISTRATION

APPROVED BY OMB: NO. 3150-0198

OMB EXPIRATION DATE: 04/30/2019

OMB EXPIRATION DATE: 04/30/2019

Estimated burden per response to comply with this mandatory collection request 20 minutes. NRC will use this information to track general licensees and their devices to ensure a higher level of device accountability. Send comments regarding burden estimate to the FOIA, Privacy, and Information Collection Branch (T-6A10M), U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001, or by internet e-mail to Infocollects.Resource@nrc.gov, and to the Desk Officer, Office of Information and Regulatory Affairs, NEOB-10202, (3150-0198), 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.

Complete all six sections of this registration form. If any of the preprinted information is incorrect, provide the changes in the applicable boxes. USE CAPITAL LETTERS.

**General License
Registration Number**

SECTION 1 - GENERAL LICENSEE INFORMATION

'GL-705848-25'

Enter the company name and the street address for the physical location of use for your device(s). For portable devices, specify the primary storage location. Do not use P.O. Boxes.

Company Name, VCF FILMS INC

[illegible]

Department: DIVISION OF PMC INC

[illegible]

Address Line 1: 1100 SUTTON AVENUE

[illegible]

Address Line 2:

[illegible]

City. HOWELL

[illegible]

State: MI

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Zip Code. 488431716

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[illegible]





11/07/2019

SECTION 2

PAGE 1 of 3

Distributor/Distributed By: NDC Technologies

[illegible][illegible][illegible][illegible][illegible]

0	9	2	4	2	0	1	9
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☒ Not in possession of device (Also complete Section 4.)

	Isotope (e.g. AM241)	Activity (e.g. 1005)	Unit (e.g. mCi)
1	AM241	150	
2			
3			
4			
5			
6			



11/07/2019

SECTION 2

PAGE 2 of 3

Distributor/Distributed By: NDC Technologies

[illegible][illegible][illegible][illegible][illegible]

0	9	2	4	2	0	1	9
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☒ Not in possession of device (Also complete Section 4.)

	Isotope (e.g. AM241)	Activity (e.g. 1005)	Unit (e.g. mCi)
1	AM241 <div><div></div><div></div><div></div><div></div><div></div></div>	150 <div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div></div>	mCi <div><div></div><div></div><div></div></div>
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6	<div><div></div><div></div><div></div><div></div><div></div></div>	<div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div></div>	<div><div></div><div></div><div></div></div>



PAGE 1 of 1

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GL-705848-25

11/07/2019

SECTION 4 - NOT IN POSSESSION OF DEVICE**SECTION 4**

PAGE 1 of 1

Provide Information about devices listed in Section 2 or 6, but no longer in your possession.**Part 1**

NRC Device Key:

(from Section 2 or 6)

679544

Transfer Date:

09242019

MM

DD

YYYY

Location of the Device:

- ☐ Whereabouts Unknown (Complete Part 1 only)
- ☐ Never Possessed the Device (Complete Part 1 only)
- ☐ Returned to Manufacturer (Complete Part 1 only)
- ☐ Transferred to another general licensee (Complete Parts 2 and 3)
- ☒ Transferred to a Specific Licensee (Not the manufacturer) (Complete Part 2)

Part 2

License Number of Recipient (if transferred to a specific licensee).

03214580002

Company Name:

NDC TECHNOLOGY

Department:

Address Line 1:

8001 TECHNOLOGY BLVD

Address Line 2:

City:

DAYTON

State:

OH

Zip Code

45424

Part 3**Enter the name of the individual responsible for this device:**

Last name:

First name:

Middle Initial

Business Telephone
Number

Extension.

Title:





GL-705848-25

11/07/2019

SECTION 5 - CERTIFICATION

SECTION 5

PAGE 1 of 1

I hereby certify that:

- A. All information contained in this registration is true and complete to the best of my knowledge and belief.
- B. A physical inventory of the devices subject to registration has been completed, and the device information on this form has been checked against the device labeling.
- C. I am aware of the requirements of the general license, provided in 10 CFR 31.5.

(Copied of applicable regulations may be viewed at the NRC website at:

<http://www.nrc.gov/reading-rm/doc-collections/cfr>)

Sabine Kuch

11.25.19

SIGNATURE - RESPONSIBLE INDIVIDUAL (Listed in Section 1)

DATE

WARNING: FALSE STATEMENTS MAY BE SUBJECT TO CIVIL AND/OR CRIMINAL PENALTIES. NRC REGULATIONS REQUIRE THAT SUBMISSIONS TO THE NRC BE COMPLETE AND ACCURATE IN ALL MATERIAL ASPECTS. 10 U.S.C SECTION 1001 MAKES IT A CRIMINAL OFFENSE TO MAKE A WILLFULLY WRONG STATEMENT OR REPRESENTATION TO ANY DEPARTMENT OR AGENCY OF THE UNITED STATES AS TO ANY MATTER IN ITS JURISDICTION.



GL-705848-25

11/07/2019



SECTION 6 - DEVICE NOT SUBJECT TO REGISTRATION

SECTION 6
PAGE 1 of 1

NRC Device Key:

Manufacturer License No.

Manufacturer Name:

Model Number:

Serial #:

Transfer Date:

Isotope:

Activity:

Unit:





GL-705848-25

11/07/2019

SECTION 4 - NOT IN POSSESSION OF DEVICE



SECTION 4

PAGE 1 of 1

Provide information about devices listed in Section 2 or 6, but no longer in your possession.

Part 1

NRC Device Key:

(from Section 2 or 6)

267476

Transfer Date:

09 29 2019

MM

DD

YYYY

Location of the Device:

- ☐ Whereabouts Unknown (Complete Part 1 only)
- ☐ Never Possessed the Device (Complete Part 1 only)
- ☐ Returned to Manufacturer (Complete Part 1 only)

- ☐ Transferred to another general licensee (Complete Parts 2 and 3)
- ☒ Transferred to a Specific Licensee (Not the manufacturer) (Complete Part 2)

Part 2 License Number of Recipient (if transferred to a specific licensee):

03214580002

Company Name:

NDC TECHNOLOGIES

Department:

Address Line 1:

8001 TECHNOLOGY BLVD

Address Line 2:

City:

DAYTON

State:

OH

Zip Code:

45424

Part 3

Enter the name of the individual responsible for this device:

Last name:

First name:

Middle Initial:

Business Telephone Number:

Extension:

Title



GL-705848-25
11/07/2019

SECTION 5 - CERTIFICATION

SECTION 5
PAGE 1 of 1

I hereby certify that

- A. All information contained in this registration is true and complete to the best of my knowledge and belief
- B. A physical inventory of the devices subject to registration has been completed, and the device information on this form has been checked against the device labeling
- C. I am aware of the requirements of the general license, provided in 10 CFR 31.5
(Copied of applicable regulations may be viewed at the NRC website at:
<http://www.nrc.gov/reading-rm/doc-collections/cfr>)

Sabine Kuss 11-25-19

SIGNATURE - RESPONSIBLE INDIVIDUAL (Listed In Section 1)

DATE

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GL-705848-25

11/07/2019



SECTION 6 - DEVICE NOT SUBJECT TO REGISTRATION

SECTION 6
PAGE 1 of 1

NRC Device Key:

Manufacturer License No.

Manufacturer Name

Model Number.

Serial #

Transfer Date

Isotope:

Activity.

Unit.





GL-705848-25

11/07/2019

SECTION 4 - NOT IN POSSESSION OF DEVICE**SECTION 4**

PAGE 1 of 1

Provide information about devices listed in Section 2 or 6, but no longer in your possession.**Part 1**

NRC Device Key:

(from Section 2 or 6)

267477

Transfer Date:

09242019

MM

DD

YYYY

Location of the Device:

- ☐ Whereabouts Unknown (Complete Part 1 only)
- ☐ Never Possessed the Device (Complete Part 1 only)
- ☐ Returned to Manufacturer (Complete Part 1 only)

- ☐ Transferred to another general licensee (Complete Parts 2 and 3)
- ☒ Transferred to a Specific Licensee (Not the manufacturer)
(Complete Part 2)

Part 2

License Number of Recipient (if transferred to a specific licensee).

03214580002

Company Name

MDC TECHNOLOGY

Department:

7

Address Line 1:

8001 TECHNOLOGY BLVD

Address Line 2:

City:

DAYTON

State:

OH

Zip Code:

45424

Part 3**Enter the name of the individual responsible for this device:**

Last name:

First name:

Middle Initial:

Business Telephone
Number

Extension

Title:



GL-705848-25

11/07/2019

SECTION 5 - CERTIFICATION

SECTION 5

PAGE 1 of 1

I hereby certify that:

- A. All information contained in this registration is true and complete to the best of my knowledge and belief.
- B. A physical inventory of the devices subject to registration has been completed, and the device information on this form has been checked against the device labeling.
- C. I am aware of the requirements of the general license, provided in 10 CFR 31.5.

(Copied of applicable regulations may be viewed at the NRC website at:

<http://www.nrc.gov/reading-rm/doc-collections/cfr>)

Samuel Kuch

11.28.2019

SIGNATURE - RESPONSIBLE INDIVIDUAL (Listed in Section 1)

DATE

WARNING: FALSE STATEMENTS MAY BE SUBJECT TO CIVIL AND/OR CRIMINAL PENALTIES. NRC REGULATIONS REQUIRE THAT SUBMISSIONS TO THE NRC BE COMPLETE AND ACCURATE IN ALL MATERIAL ASPECTS. 10 U.S.C. SECTION 1001 MAKES IT A CRIMINAL OFFENSE TO MAKE A WILLFULLY WRONG STATEMENT OR REPRESENTATION TO ANY DEPARTMENT OR AGENCY OF THE UNITED STATES AS TO ANY MATTER IN ITS JURISDICTION.



GL-705848-25

11/07/2019



SECTION 6 - DEVICE NOT SUBJECT TO REGISTRATION

SECTION 6
PAGE 1 of 1

NRC Device Key:

Manufacturer License No:

Manufacturer Name:

Model Number:

Serial #:

Transfer Date:

Isotope:

Activity:

Unit:





Source Receipt Notification Letter

Thursday, Sep 26, 2019

VCF Films, Inc.
1100 Sutton
Howell, MI
48843
United States

Dear

Please be advised that the radioactive source from device as detailed below has been received by NDC Technologies under RMA# 190925-000105_no As of 09/24/2019 NDC Technologies has taken possession and ownership of the source under OH License No 03214580002.

Date Received	09/24/2019
Model	103
NDC S/N	1998, 2009, 1466
Source S/N	9006 LV, 9476 LV, 4434 LV
Isotope	Am-241
Activity	5.55Gbq

Notification of this transfer must be sent to your government agency that controls radiation in your area. This notification must be sent on company letterhead. If you have any questions please feel free to contact me, radiationsafety@ndc.com

Regards

Terry Arbogast

Radiation Safety Officer

NDC Technologies Inc

MAKING LIGHT WORK

Sabine Lucks

From: rlackaye@plasticscolor.com
Sent: Tuesday, October 01, 2019 1:58 PM
To: Sabine M Lucks
Subject: RE: VCF Films RMA#190925-000105_no.

Categories: Red Category

Sabine ,

Hi , I called the NRC in Washington and they advised that the notification letter should be sent to the address listed below .

U.S. NRC Region III 2443 Warrenville Road Suite 210 **Lisle, Illinois** 60532-4352. Phone: 630-829-9500 Toll Free: 1-800-522-3025 7 am to 4:30 pm (CT), Monday through Friday Fax: 630-515-1078 TDD: 301-415-5575 E-mail: See our Contact a Public Affairs Officer page and select Chicago, IL (Reg III).

Does VCF still have some type of License ?
If so the license may need to be terminated.

Please let me know if you have any additional questions
Regards,

Robert W. Lackaye
Corporate EH&S Manager
Plastics Color Corporation
(908) 347-6503
rlackaye@plasticscolor.com

From: rlackaye@plasticscolor.com <rlackaye@plasticscolor.com>
Sent: Friday, September 27, 2019 11:10 AM
To: Sabine M Lucks (slucks@zenithglobal.net) <slucks@zenithglobal.net>
Subject: FW: VCF Films RMA#190925-000105_no.

Sabine,

Hi, I just also left a voice message with Terry.

The USNRC web site lists a mailing address without a street or PO box , so I would like Terry to confirm the proper mailing address.

A simple letter on VCF letterhead advising the USNRC of this transfer is all that should be needed, you might also attach the NDC Source Receipt Notification Letter.

Hopefully we hear from Terry shortly.

Regards,

Robert W. Lackaye
Corporate EH&S Manager
Plastics Color Corporation
(908) 347-6503
rlackaye@plasticscolor.com

From: rlackaye@plasticscolor.com <rlackaye@plasticscolor.com>
Sent: Friday, September 27, 2019 11:01 AM

To: 'radiationsafety@ndc.com' <radiationsafety@ndc.com>
Cc: Sabine M Lucks (slucks@zenithglobal.net) <slucks@zenithglobal.net>
Subject: VCF Films RMA#190925-000105_no.

Terry Arbogast,
Hi, on 9/26/19 VCF films received a Source Receipt Notification Letter from NDC.
Since the facility is located in MI , I believe we must notify the USNRC of this transfer.
Could you please confirm the proper mailing address for the US Nuclear Regulatory Commission.

Thank You,

Robert W. Lackaye
Corporate EH&S Manager
Plastics Color Corporation
(908) 347-6503
rlackaye@plasticscolor.com



Source Receipt Notification Letter

Thursday, Sep 26, 2019

VCF Films, Inc.
1100 Sutton
Howell, MI
48843
United States

Dear

Please be advised that the radioactive source from device as detailed below has been received by NDC Technologies under RMA# 190925-000105_no As of 09/24/2019 NDC Technologies has taken possession and ownership of the source under OH License No 03214580002.

Date Received	09/24/2019
Model	103
NDC S/N	1998, 2009, 1466
Source S/N	9006 LV, 9476 LV, 4434 LV
Isotope	Am-241
Activity	5.55Gbq

Notification of this transfer must be sent to your government agency that controls radiation in your area. This notification must be sent on company letterhead. If you have any questions please feel free to contact me, radiationsafety@ndc.com

Regards

Terry Arbogast

Radiation Safety Officer

NDC Technologies Inc

MAKING LIGHT WORK



VCF Films, Inc
1100 Sutton St
Howell, MI 48843
Tel-517-546-2300
Fax- 517-546-2984

10/01/2019

To:

U.S. NRC Region III
2443 Warrenville Road Suite 210
Lisle, Illinois 60532-4352.

Ref: Change of Ownership

To Whom It May Concern:

VCF Films, Inc has seized operations Mid 2013 and no longer have any production nor devices.
General License GL705848-24 needs to be cancelled or revoked. I am not sure what the formal process
is. Please advise.

Please be advised that the radioactive source from device as detailed below has been received by NDC
Technologies under RMA# 190925-000105. As of 09/24/2019 NDC Technologies has taken possession
and ownership of the source under OH License No 03214580002.

Date Received	09/24/2019
Model	103
NDC S/N	1998, 2009, 1466

Regards,

Sabine M. Lucks
General Manager
VCF Films, Inc
Direct: 517-618-0971

Attachment: Source Receipt Notification Letter (NDC)

