

**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, 37, 39, 40, 70 and 71, 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.

Licensee		In accordance with letter dated June 11, 2018.	4. Expiration Date: October 31, 2026
1. H3D, Inc.		3. License number: 21-35314-01 is amended in its entirety to read as follows:	5. Docket No.: 030-38932 Reference No.:
2. 812 Avis Dr. Ann Arbor, MI 48108			
6. Byproduct, source, and/or special nuclear material	7. Chemical and/or physical form	8. Maximum amount that licensee may possess at any one time under this license	9. Authorized use
A. Cobalt-57	A. Sealed Sources (Eckert & Ziegler, Model GF Type R Series)	A. 100 microcuries per source and 5 millicuries total	A. For research and development as defined in 10 CFR 30.4, calibration and checking of the licensee's instruments, and calibration and testing of instruments, including commercial calibration service for any person as defined in 10 CFR 30.4.
B. Cobalt-60	B. Sealed Sources (Eckert & Ziegler, Model GF Type R Series, GF-060-D)	B. 100 microcuries per source and 5 millicuries total	B. Same as Item 9.A.
C. Silver-110m	C. Sealed Sources (Eckert & Ziegler, Model GF Type R Series)	C. 100 microcuries per source and 5 millicuries total	C. Same as Item 9.A.
D. Barium-133	D. Sealed Sources (Eckert & Ziegler, Model GF Type R Series, GF-133-D)	D. 100 microcuries per source and 5 millicuries total	D. Same as Item 9.A.

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6. Byproduct, source, and/or special nuclear material	7. Chemical and/or physical form	8. Maximum amount that licensee may possess at any one time under this license	9. Authorized use
E. Cesium-137	E. Sealed Sources (Eckert & Ziegler, Model GF Type R Series, GF-137-D)	E. 100 microcuries per source and 5 millicuries total	E. Same as Item 9.A.
F. Europium-152	F. Sealed Sources (Eckert & Ziegler, Model GF Type R Series, GF-152-D)	F. 100 microcuries per source and 5 millicuries total	F. Same as Item 9.A.
G. Bismuth-207	G. Sealed Sources (Eckert & Ziegler, Model GF Type R Series)	G. 100 microcuries per source and 5 millicuries total	G. Same as Item 9.A.
H. Americium-241	H. Sealed or plated sources (Eckert & Ziegler, Model GF Type R Series, GF-241-D, AF-241-A1)	H. 1 microcurie per Eckert & Ziegler Model AF-241-A1 source; 100 microcuries per source, all other models; and 5 millicuries total	H. Same as Item 9.A.
I. Manganese-54	I. Sealed Sources (Eckert & Ziegler, Model GF Type D Series, GF-054-D)	I. 100 microcuries per source and 5 millicuries total	I. Same as Item 9.A.
J. Sodium-22	J. Sealed Sources (Eckert & Ziegler, Model GF Type D Series)	J. 100 microcuries per source and 5 millicuries total	J. Same as Item 9.A.
K. Californium-252	K. Sealed or plated sources (Eckert & Ziegler, Model AF-252-A1; Frontier Technology Corporation, Model 100)	K. 1 microcurie per Eckert & Ziegler Model AF-252-A1 source; 100 microcuries per source, all other models; and 200 microcuries total	K. Same as Item 9.A.



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| 6. Byproduct, source, and/or special nuclear material | 7. Chemical and/or physical form  | 8. Maximum amount that licensee may possess at any one time under this license | 9. Authorized use    |
| L. Sodium-22  | L. Calibration and Standard Reference Sources (Eckert & Ziegler, Model MMS09) | L. 100 microcuries per source and 100 microcuries total                        | L. Same as Item 9.A. |

**CONDITIONS**

10. Licensed material may be used or stored at the licensee's facilities located at 812 Avis Drive, Ann Arbor, Michigan, 48108.
11. The Radiation Safety Officer (RSO) for this license is Brian Kitchen, Ph.D.
12. Licensed material shall only be used by, or under the supervision of:

Authorized Users

Yvan Boucher, Ph.D.  
William Kaye, Ph.D.  
Brian Kitchen, Ph.D.  
Christopher Wahl, Ph.D.  
Weiyi Wang, Ph.D.  
Feng Zhang, Ph.D.

Material and Use

All  
All  
All  
All  
All  
All

13. A. Sealed sources and detector cells 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 by an Agreement State. In the absence of a registration certificate, sealed sources shall be tested for leakage and/or contamination at intervals not to exceed 6 months, or at such other intervals as specified.

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- B. Notwithstanding Paragraph A of this Condition, sealed sources designed to primarily emit alpha particles shall be tested for leakage and/or contamination at intervals not to exceed 3 months.
- C. 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 by 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.
- D. Sealed sources need not be tested if they contain only hydrogen-3; or they contain only a radioactive gas; or the half-life of the isotope is 30 days or less; or they contain not more than 100 microcuries of beta- and/or gamma-emitting material or not more than 10 microcuries of alpha-emitting material.
- E. 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.
- F. The leak test shall be capable of detecting the presence of 185 becquerels (0.005 microcuries) of radioactive material on the test sample. If the test reveals the presence of 185 becquerels (0.005 microcuries) 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.
- G. Tests for leakage and/or contamination, including leak test sample collection and analysis, shall be performed by the licensee or other persons specifically licensed by the U.S. Nuclear Regulatory Commission or an Agreement State to perform such services.
- H. Records of leak test results shall be kept in units of becquerels (microcuries) and shall be maintained for 3 years.



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14. The licensee shall conduct a physical inventory every 6 months, or at other intervals approved by the U.S. Nuclear Regulatory Commission, to account for all sealed sources and/or devices received and possessed under the license. Records of inventories shall be maintained for 3 years from the date of each inventory, and shall include the radionuclides, quantities, manufacturer's name and model numbers, and the date of the inventory.
15. Sealed sources containing licensed material shall not be opened by the licensee, except as specifically authorized.
16. The licensee shall not use licensed material in field applications where activity is released except as provided otherwise by specific condition of this license.
17. The licensee shall not use the licensed material in or on humans.
18. 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. This license condition applies only to those procedures that are required to be submitted in accordance with the regulations. 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. Application dated July 13, 2016 (ML16201A185)
  - B. Letter dated October 5, 2016 (ML16279A340)
  - C. Letter dated July 12, 2017 (ML17198A548)
  - D. Letter dated September 1, 2017 (ML17283A333)
  - E. Letter dated October 19, 2017 (ML17292B544)
  - F. Application dated February 19, 2018 (ML18058A645)

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G. Letter dated June 11, 2018 (ML18166A186)

H. Letter dated October 3, 2018 (ML18277A102)



FOR THE U.S. NUCLEAR REGULATORY COMMISSION

Date: January 9, 2020

By: \_\_\_\_\_

Sara A. ForsterSara A. Forster  
Region 3