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DRAFT REGULATORY GUIDE AND VALUE/IMPACT STATEMENT

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GUIDE FOR THE PREPARATION OF APPLICATIONS FOR LICENSES
FOR THE USE OF RADIOACTIVE MATERIALS IN CALIBRATING RADIATION
SURVEY AND MONITORING INSTRUMENTS

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This regulatory guide and the associated value/impact statement are being issued in draft form to involve the public in the early stages of the development of a regulatory position in this area. They have not received complete staff review and do not represent an official NRC staff position.

Public comments are being solicited on both drafts, the guide (including any implementation schedule) and the value/impact statement. Comments on the value/impact statement should be accompanied by supporting data. Comments on both drafts should be sent to the Secretary of the Commission, U.S. Nuclear Regulatory Commission, Washington, D.C. 20555, Attention: Docketing and Service Branch, by August 20, 1985.

Requests for single copies of draft guides (which may be reproduced) or for placement on an automatic distribution list for single copies of future draft guides in specific divisions should be made in writing to the U.S. Nuclear Regulatory Commission, Washington, D.C. 20555, Attention: Director, Division of Technical Information and Document Control.

TABLE OF CONTENTS

<u>Section</u>	<u>Page</u>
1. INTRODUCTION	1
1.1 Purpose of Guide	1
1.2 Applicable Regulations	1
1.3 As Low As Is Reasonably Achievable (ALARA) Philosophy	2
2. FILING AN APPLICATION	2
3. CONTENTS OF AN APPLICATION	4
Item 1 - License Information.	4
Item 2 - Applicant's Name and Mailing Address	4
Item 3 - Locations of Use	5
Item 4 - Person To Be Contacted About Application	5
Item 5 - Material To Be Possessed	5
Item 6 - Purpose for Which Licensed Material Will Be Used	6
Item 7 - Individuals Responsible for Radiation Safety-- Their Training and Experience.	7
Item 8 - Training for Individuals Working in or Frequenting Restricted Areas	8
Item 9 - Facilities and Equipment	9
Item 10 - Radiation Safety Program	10
10.1 Personnel Monitoring Equipment	10
10.2 Radiation Detection Instruments and Instrument Calibration	10
10.3 Operating and Emergency Procedures	11
Item 11 - Waste Management	13
Item 12 - License Fees	14
Item 13 - Certification.	14
Item 14 - Voluntary Economic Data.	14
4. AMENDMENTS TO A LICENSE	16
5. RENEWAL OF A LICENSE	17
Appendix A	19
Draft Value/Impact Statement	21

1. INTRODUCTION

1.1 PURPOSE OF GUIDE

The purpose of this regulatory guide is to provide assistance to applicants and licensees in preparing applications for new licenses, license amendments, and license renewals for the use of radioactive material in commercial calibration services for NRC or Agreement State licensees. The services covered by this guide are the calibration of radiation survey and monitoring instruments.

This regulatory guide is intended to provide you, the applicant and licensee, with information that will enable you to understand specific regulatory requirements and licensing policies as they apply to your services. The information in this guide is not a substitute for training in radiation safety.

After you are issued a license, you must conduct your program in accordance with (1) the statements, representations, and procedures contained in your application, (2) the terms and conditions of the license, and (3) the NRC's regulations. The information you provide in your application should be clear, specific, and accurate.

1.2 APPLICABLE REGULATIONS

NRC regulations applicable to the specified calibration services are in 10 CFR Part 19, "Notices, Instructions and Reports to Workers; Inspections"; 10 CFR Part 20, "Standards for Protection Against Radiation"; 10 CFR Part 21, "Reporting of Defects and Noncompliance"; 10 CFR Part 30, "Rules of General Applicability to Domestic Licensing of Byproduct Material"; 10 CFR Part 71, "Packaging and Transportation of Radioactive Material"; and 10 CFR Part 170, "Fees for Facilities and Materials Licenses and Other Regulatory Services Under the Atomic Energy Act of 1954, as Amended." It is your responsibility as an applicant and as a licensee to have copies of, to read, and to abide by each regulation. As a licensee, you are subject to all applicable provisions of the regulations that pertain to using licensed material in the specified calibration services.

This guide identifies the information needed to complete NRC Form 313 for applications for a license for the use of radioactive material in certain

calibration services. The information collection requirements in NRC Form 313 have been cleared under OMB Clearance No. 3150-0120.

1.3 AS LOW AS IS REASONABLY ACHIEVABLE (ALARA) PHILOSOPHY

As an applicant, you must not only be prepared to comply with all applicable regulations, but you must also make a commitment to the ALARA philosophy as stated in paragraph 20.1(c) of 10 CFR Part 20: "...persons engaged in activities under licenses issued by the Nuclear Regulatory Commission pursuant to the Atomic Energy Act of 1954, as amended, and the Energy Reorganization Act of 1974 should, in addition to complying with the requirements set forth in this part, make every reasonable effort to maintain radiation exposures, and releases of radioactive materials in effluents to unrestricted areas, as low as is reasonably achievable." Regulatory Guide 8.10, "Operating Philosophy for Maintaining Occupational Radiation Exposures As Low As Is Reasonably Achievable," provides the NRC staff position on this important subject. As an applicant, you should consider the ALARA philosophy as described in Regulatory Guide 8.10 in the development of plans for work with licensed radioactive materials.

2. FILING AN APPLICATION

You, as an applicant for a materials license, should complete NRC Form 313 (see Appendix A to this guide). You should complete Items 1 through 4, 12, 13, and 14 on the form itself. For Items 5 through 11, submit the required information on supplementary pages. Each separate sheet or document submitted with your application should be identified and keyed to the item number on the application to which it refers. All typed pages, sketches, and, if possible, drawings should be on 8-1/2 x 11 inch paper to facilitate handling and review. If larger drawings are necessary, fold them to 8-1/2 x 11 inches.

You should complete all items in the application in sufficient detail for the NRC to determine that your equipment, facilities, training and experience, and radiation safety program are adequate to protect health and minimize danger to life or property.

Please note that license applications are available for review by the general public in the NRC Public Document Rooms. Do not submit proprietary information unless it is absolutely necessary. If submittal of such information

is necessary, follow the procedure in § 2.790 of 10 CFR Part 2. Failure to follow this procedure may result in disclosure of the proprietary information to the public or substantial delays in processing your application.

Do not submit personal information about your individual employees unless it is necessary. For example, the training and experience of individuals should be submitted to demonstrate their ability to manage radiation safety programs or to work safely with radioactive materials. Home addresses and home telephone numbers should be submitted only if they are part of an emergency response plan. Dates of birth, Social Security numbers, and radiation dose information should be submitted only if specifically requested by NRC.

You should file your application in duplicate. Retain one copy for yourself, because the license will require that you possess and use licensed material in accordance with the statements and representations in your application and any supplements to it.

If you wish to possess or use licensed material on Federal property or in any State subject to NRC jurisdiction, you should file your application with the NRC Regional Office for the State in which the material will be possessed or used. (A list of NRC's Regional Offices and the States they cover is provided below.) The exceptions to the above are the United States Air Force and Navy and persons wishing to distribute exempt material under 10 CFR Part 32 Subpart A, who should file their applications directly with the U.S. Nuclear Regulatory Commission, Division of Fuel Cycle and Material Safety, Washington, DC 20555.

Twenty-seven States have entered into agreements with the NRC that give them the authority to license radioactive materials used or possessed within their borders. These States are called Agreement States. A current list of Agreement States (including names, addresses, and telephone numbers of responsible officials) may be obtained upon request from the Material Licensing Branch, U.S. Nuclear Regulatory Commission, Washington, DC 20555, or from NRC's Regional Offices, whose addresses are listed below. If you are a non-Federal organization that wishes to possess or use licensed material in one of these Agreement States, your application should be filed with the State's radiation control program and not with the NRC.

If you are located in Connecticut, Delaware, District of Columbia, Maine, Maryland, Massachusetts, New Hampshire, New Jersey, New York, Pennsylvania, Rhode Island, or Vermont, send your applications to the U.S. Nuclear Regulatory

Commission, Region I, Nuclear Material Section B, 631 Park Avenue, King of Prussia, PA 19406.

If you are located in Alabama, Florida, Georgia, Kentucky, Mississippi, North Carolina, Puerto Rico, South Carolina, Tennessee, Virginia, Virgin Islands, or West Virginia, send your applications to the U.S. Nuclear Regulatory Commission, Region II, Material Radiation Protection Section, 101 Marietta Street, Suite 2900, Atlanta, GA 30323.

If you are located in Illinois, Indiana, Iowa, Michigan, Minnesota, Missouri, Ohio, or Wisconsin, send your applications to the U.S. Nuclear Regulatory Commission, Region III, Material Licensing Section, 700 Roosevelt Road, Glen Ellyn, IL 60137.

If you are located in Arkansas, Colorado, Idaho, Kansas, Louisiana, Montana, Nebraska, New Mexico, North Dakota, Oklahoma, South Dakota, Texas, Utah, or Wyoming, send your applications to the U.S. Nuclear Regulatory Commission, Region IV, Material Radiation Protection Section, 611 Ryan Plaza Drive, Suite 100, Arlington, TX 76011.

If you are located in Alaska, Arizona, California, Hawaii, Nevada, Oregon, Washington, or U.S. territories and possessions in the Pacific, send your applications to the U.S. Nuclear Regulatory Commission, Region V, Material Radiation Protection Section, 1450 Maria Lane, Suite 210, Walnut Creek, CA 94596.

3. CONTENTS OF AN APPLICATION

The following comments apply to the indicated items of NRC Form 313.

Item 1 - LICENSE INFORMATION

For a new license, check subitem A. For an amendment to an existing license, check subitem B. For a renewal of an existing license, check subitem C.

Item 2 - APPLICANT'S NAME AND MAILING ADDRESS

If you are an individual, you should be designated as the applicant only if you are acting in a private capacity and the use of byproduct material is not connected with your employment with a corporation or other legal entity.

Otherwise you, the applicant, should be the corporation or other legal entity applying for the license.

The address specified here should be your mailing address for correspondence. This address may or may not be the same as the address at which the material will be used, as specified in Item 3.

Item 3 - LOCATIONS OF USE

You should specify each location of use by the street address, city, and State or other descriptive address (such as 5 miles east on Highway 10, Anytown, State) to allow us to easily locate each facility. A Post Office box address is not acceptable. If you wish to maintain and operate more than one location where byproduct material will be used, you must give the specific address of each location. In Items 5 through 11 of your application, describe the intended use and the facilities and equipment at each location. If you wish to perform services at customer facilities, simply state "and at temporary job sites of licensees."

Item 4 - PERSON TO BE CONTACTED ABOUT APPLICATION

You should name the individual who knows your proposed radioactive materials program and can answer questions about your application. Note his or her telephone number. This individual will serve as the point of contact during the review of your application and during the period of your license. This person is usually the radiation safety officer or a principal user of radioactive materials. Notify the NRC if the person assigned to this function changes.

Items 5 - MATERIAL TO BE POSSESSED

You should identify the sealed reference sources to be used in the instrument calibration services provided to your customers. The following are examples of listings of licensed materials:

a Element & Mass Number	b Chemical and Physical Form* (Manufacturer and Model No. of Sources)	c Maximum Activity Per Source
1. Cesium-137	1. Sealed rod source (XYZ Inc. Model 10)	1. Not to exceed 250 microcuries/ source
2. Cesium-137	2. Sealed rod source (Nuclides, Inc. Model 50)	2. Not to exceed 50 millicuries/ source
3. Cesium-137	3. Sealed source (Nuclides, Inc. Model 91)	3. Not to exceed 130 curies/source
4. Cobalt-60	4. Sealed source (XYZ, Inc. Model 351)	4. Not to exceed 20 millicuries/ source

*You should list the manufacturer and model number of the reference sources under subitem b. You need not state under subitem c the number of sources you intend to possess. Simply list the maximum activity per source as in the example.

Item 6 - PURPOSE FOR WHICH LICENSED MATERIAL WILL BE USED

Specify the purpose for which each type of source listed in Item 5 will be used. If a source is contained in a device, you need to specify the manufacturer and model number of each device (calibrator). The following is an example of such a listing for the sources specified in Item 5 above.

1. To be used for low-range (.01 to 2 mR/hr) calibration of portable survey meters.
2. To be used for medium- (1 to 500 mR/hr) and low-range calibration of survey meters.
3. To be used in a Nuclides, Inc. Model 100 shielded calibrator for the high-range (>1 R/hr) calibration of radiation measuring meters and devices.
4. To be used for calibration of medium- and low-range portable survey meters.

Item 7 - INDIVIDUALS RESPONSIBLE FOR RADIATION SAFETY--THEIR TRAINING AND
EXPERIENCE

Paragraph 30.33(a)(3) of 10 CFR Part 30 specifies that, before your application is approved, you must be qualified by training and experience to use the material for the purposes requested in such a manner as to protect health and minimize danger to life or property.

You should provide the following information about the individual or individuals who will be responsible for your radiation safety program ("responsible individual").

1. The name of each "responsible individual."

a. The name of the individual or individuals responsible for both your day-to-day radiation protection program and for ensuring compliance with applicable NRC regulations and the terms and conditions of your license. This individual is normally the Radiation Safety Officer (RSO).

b. The names of any other personnel who will actually perform or directly supervise the instrument calibration procedures.

NOTE: The "responsible individuals" you list in a and b will also be listed on your license as users. The licensed materials specified on your license should be used by, or under the supervision of, these designated individuals.

2. The training of each "responsible individual."

You should submit a resumé of training and experience for each "responsible individual" listed above. This resumé should cover formal academic training and on-the-job training in calibrating the specified survey and monitoring equipment. Guidelines on training and experience are:

a. Formal training should encompass:

(1) The principles and practices of radiation protection.

- (2) Radioactivity measurements, monitoring techniques, and the use of instruments.
- (3) Mathematics and calculations basic to the use and measurement of radioactivity.
- (4) The biological effects of radiation.

b. A minimum of 40 hours of formal course work should be completed by each "responsible individual" listed in Item 7.

c. On-the-job training should encompass hands-on experience in calibrating the types of monitoring and measuring instruments typical of those expected to be calibrated for your customers. On-the-job training should be for 1 to 2 weeks; the sources or devices used should be similar in activity to those listed in Item 5. The description of on-the-job training for each individual should identify where, when, and by whom the training was given.

d. Outline any additional training that will be provided periodically to your "responsible individuals" to keep them up to date on instrument calibration techniques and on any new-model survey and monitoring instruments that will be accepted for calibration and maintenance services. Your application should indicate that such training will be augmented by using the manufacturers' most recent service manuals and instruction sheets, which would provide new information on the instrument manufacturer's recommended servicing and calibration procedures and methods.

Item 8 - TRAINING FOR INDIVIDUALS WORKING IN OR FREQUENTING RESTRICTED AREAS

Since you have named "responsible individuals" and provided resumés of their training and experience in Item 7, in this item you should provide information on the training (pursuant to § 19.12 of 10 CFR Part 19) that will be provided to any ancillary personnel who may frequent any radiation area or work under the direct supervision of your "responsible individuals." Consider secretarial and janitorial personnel and technicians, among others, who might work directly under the supervision of your "responsible individuals" or who might frequent any restricted area in your facility. You should provide the following information on this training:

1. An outline of your training program, including the topics that will be covered. Examples of topics to be included in this training are (1) the basic principles and fundamentals of radiation safety and good safety practices related to your use of radioactive materials, (2) the purpose for which radiation detection instruments will be used, (3) a review of your operating and emergency procedures, including safety procedures unique to your uses and facilities, and (4) specific instruction in precautions and procedures to be used to minimize any exposure to radiation and radioactive materials.

2. The duration of your training program. The duration should be commensurate with your radiological health protection problems, but should be from 2 to 8 hours.

3. The name of your training instructor or instructors. If your instructor is not a "responsible individual" specified in Item 7, submit his or her qualifications. The minimum qualifications for an instructor should be the same as those for a "responsible individual" specified in Item 7.

4. A commitment that records documenting the training of each individual will be maintained.

Item 9 - FACILITIES AND EQUIPMENT

Paragraph 30.33(a)(2) of 10 CFR Part 30 states that an application will be approved if, among other things, the applicant's proposed facilities and equipment are adequate to protect health and minimize danger to life and property. Therefore, you should describe each facility where survey and monitoring instruments will be calibrated. Annotated sketches are helpful and should be included when appropriate. If calibrations will be performed at customers' sites, provide information on the types of restricted areas to be established at these sites. Include descriptions of the following:

- Restricted areas within calibration laboratory areas,
- The location of any beam calibrators and calibration range facilities, including a description of the range facility,
- Means of minimizing scatter,
- The location of any self-contained calibration facilities,
- Source storage facilities,
- Source handling equipment,

- Auxiliary shielding and description of use,
- Means of preventing entry into high radiation areas, and
- Means of preventing unauthorized use or removal of licensed material.

NOTE: Sketches and descriptions should show the relationship of material use areas to any adjoining unrestricted areas (e.g., offices, rest rooms, cafeterias, and other areas not under your control).

Item 10 - RADIATION SAFETY PROGRAM

10.1 Personnel Monitoring Equipment

Section 20.202 of 10 CFR Part 20 requires that personnel monitoring equipment be used by individuals entering restricted areas who receive, or are likely to receive, a dose in excess of 25% of the dose specified in paragraph 20.101(a) of 10 CFR Part 20. The specified doses per calendar quarter are 1-1/4 rems to the whole body, head and trunk, active blood-forming organs, or gonads; 18-3/4 rems to the hands and forearms or feet and ankles; and 7-1/2 rems to the skin of the whole body. Individuals under 18 years of age need to use personnel monitoring equipment if they receive, or are likely to receive, a dose in excess of 5% of the specified doses in paragraph 20.101(a). In addition, personnel monitoring equipment must be used by any individual who enters a high radiation area.

All your personnel should wear personnel monitoring devices such as film badges or thermoluminescent dosimeters (TLDs) pursuant to § 20.202 of 10 CFR Part 20 when performing instrument calibration services. If personnel monitoring equipment will be used, specify that the organization furnishing the film badge or TLD service will be a commercial service company and state the exchange intervals for the film badges or TLDs. Film badges should be exchanged at intervals not to exceed 1 month and TLDs at intervals not to exceed 3 months.

10.2 Radiation Detection Instruments and Instrument Calibration

According to § 20.201 of 10 CFR Part 20, each licensee must make surveys as necessary to evaluate the extent of radiation hazards that may be present during the possession and use of licensed material. Therefore, you should list the radiation detection (survey or monitoring) instruments you will have

available for your own use in manipulating the requested sealed sources and in performing your calibration services. Your list should specify for each instrument (1) the type of instrument, (2) the number of instruments available, (3) the type of radiation detected, (4) the sensitivity range, and (5) the specific use. Survey instruments should be calibrated at least annually and following servicing pursuant to § 30.53 of 10 CFR Part 30. You should state the interval at which your listed instruments will be calibrated. The following is an example of such a listing:

RADIATION DETECTION INSTRUMENTS

TYPE	NUMBER AVAILABLE	RADIATION DETECTED	SENSITIVITY RANGE	USE
Portable thin-window GM survey meter	2	Beta, gamma	0-500 mr/hr	Survey and monitoring

10.3 Operating and Emergency Procedures

Each individual who will perform calibrations on customers' radiation survey and monitoring instruments should have a set of operating and emergency procedures. You should state in your application that personnel will be provided with operating and emergency procedures. Submit an outline of the basic elements of the procedures to be provided to your personnel. The following elements should be included in your operating and emergency procedures, if applicable:

1. Step-by-step instructions for performing calibrations of survey and monitoring instruments (including pocket dosimeters, if applicable). The following are considered acceptable criteria for calibration:*

*For more detailed information about survey instrument calibration, see "Radiation Protection Instrumentation Test and Calibration," ANSI N323-1978. Copies are available from the American National Standards Institute, 1430 Broadway, New York, NY 10018. Additional guidance is being developed on this subject; Draft Regulatory Guide OP 032-5, "Test and Calibration of Radiation Protection Instrumentation," has been published for public comment.

- Calibrations of survey meters should be performed with radio-nuclide sources. (Neither electronic calibrations that do not involve a source of radiation nor the use of small check sources such as those incorporated into some survey meters are acceptable for calibration.)
 - The sources should be approximate point sources.
 - The activity of the source or exposure rates at given distances should be traceable by documented measurements to a standard source certified within 5% accuracy by the U.S. National Bureau of Standards (NBS) or other recognized standards laboratory.
 - Instruments should be calibrated at least annually and after servicing.
 - Each scale of an instrument should be calibrated at at least two points located at approximately 1/3 and 2/3 of full scale. For logarithmic rate-changing instruments, the calibration should be made near the mid-range of each decade, and two points should be calibrated on at least one of the decades.
 - The exposure rate measured by the instrument being calibrated should differ from the true exposure rate by less than $\pm 10\%$ at the calibration points. (Read the appropriate instrument manual to determine how to make the necessary adjustments to bring the instrument into calibration.) Readings within $\pm 20\%$ will be considered acceptable if a calibration chart, graph, or response factor is prepared and used with the instrument to interpret meter readings to within $\pm 10\%$ for radiation protection purposes.
2. Step-by-step procedures for calibrating customers' pocket dosimeters.
 3. A program for routine area survey, including the areas to be surveyed, the frequency of surveys, acceptable radiation levels in specific use areas of the facility, and provisions for maintaining records of the surveys.
 4. The use of shielding and remote handling equipment when handling hard (high energy) beta- or gamma-emitting materials.
 5. Special precautions to be used when handling large sealed calibration sources.

6. Your program for routine personnel monitoring.
7. Emergency procedures to be followed in the event of fires, equipment malfunction, etc., including notification procedures.

In addition to describing the basic elements of a radiation safety program, you should describe the method you will use for the 6-month leak-testing of sealed sources or devices you possess. If you will use a leak-test kit, simply provide the name of the manufacturer and the model number of the leak-test kit. If you will perform your own inhouse leak testing, including the analysis of wipe samples, describe the procedures you will use.*

You should also provide a copy or description of the certificate of instrument calibration you will provide to customers with each calibrated instrument as part of your documentation of the elements of the radiation protection program and instrument calibration procedure. Be sure that your certificates contain the following information:

1. The customer's name, address, and person to be contacted,
2. Identification of the instrument by manufacturer, type, and model and serial number,
3. Calibration data, such as instrument readings at a point on a given scale versus exposure rates (mr/hr),
4. Any specific comments on the calibration or calibration data,
5. Identification of the calibration source or sources used in calibrating nuclide and exposure rates at specified distances (include calibration accuracy),
6. Identification of the individual performing the calibration, and
7. The date of the calibration.

Item 11 - WASTE MANAGEMENT

Sections 20.301 and 20.311 of 10 CFR Part 20 specify the general requirements for disposal of licensed material. You should describe the means you will use to dispose of licensed materials that are no longer needed such as

*Guidance is being developed on this subject. Draft Regulatory Guide FC 412-4, "Guide for the Preparation of Applications for Licenses for the Use of Radioactive Materials in Leak-Testing Services," was issued for public comment.

contaminated swipes or sealed sources. State which of the following three options you will exercise.

1. Use a waste disposal service or broker licensed by the NRC or Agreement State for the disposal of the licensed material.
2. Return any sealed sources or devices to the manufacturer in accordance with the manufacturer's specific packaging and shipping instructions.
3. Describe any other methods you will use and demonstrate their compliance with the regulations.

Item 12 - LICENSE FEES

An application fee paid in full is required by paragraph 170.12(a) of 10 CFR Part 170 for most types of licenses, including applications for license amendments and renewals. You should refer to § 170.31, "Schedule of Fees for Materials Licenses and Other Regulatory Services," to determine the amount of the fee that must accompany your application. An application received without a fee or with an inadequate fee may be returned to you. All application fees may be charged irrespective of the NRC's disposition of the application or your withdrawal of the application.

Item 13 - CERTIFICATION

If you are an individual applicant acting in a private capacity, you are required to sign and date the form pursuant to paragraph 30.32(c) of 10 CFR Part 30. Otherwise, your application should be dated and signed by your representative of the corporation or legal entity who is authorized to sign official documents and to certify that the application contains information that is true and correct to the best of your knowledge and belief. Unsigned applications will be returned for proper signature.

Item 14 - VOLUNTARY ECONOMIC DATA

The Regulatory Flexibility Act of 1980 requires Federal agencies to consider the effects of their rules on small businesses and other small entities. In order for the NRC to maintain an up-to-date data base of its licensees, four

categories of economic information are sought from applicants. These economic data will be used by the NRC in preparing regulatory analyses that contain, among other things, the anticipated economic burden a proposed rule-making action will have on affected licensees. To the extent that it is possible and consistent with public health and safety, the NRC will consider the economic burden in light of the size of the entities affected by the rule in an attempt to mitigate the potential for a significant economic impact on a substantial number of small entities.

14.a Annual Receipts

Guidance for determining the appropriate box in 14.a, Annual Receipts:*

1. Holders of One NRC License. If your organization (named on the license or application) holds one NRC license and operates from one address, check the box that most closely approximates your annual receipts; in the case of hospitals, academic institutions, or other entities that do not operate on the basis of receipts, check the box that most closely approximates the annual operating budget of your organization.
2. Holders of Multiple NRC Licenses Issued for One Address. If your organization (named on the license or application) holds multiple NRC licenses, all of which are issued to the same address, check the box that most closely approximates the annual receipts or annual operating budget for your entire organization, regardless of the number of NRC licenses possessed at that single address.
3. Holders of Multiple NRC Licenses at Multiple Addresses. If your organization (named on the license or application) holds multiple NRC licenses at multiple addresses, check the box that most closely approximates the annual receipts or annual operating budget for the operations conducted at the address on this license or application and not for the entire corporate entity.

*If the applicant is a university with a teaching hospital that operates under a separate annual budget and has been issued multiple licenses, it should distinguish the figures that pertain solely to the university from those figures that pertain solely to the teaching hospital.

14.b Number of Employees

The number of employees reported should reflect all employees for the organization at the address listed on the license or application, excluding outside contractors. The number of employees reported should not be that of a single department or division within the organization.

14.c Number of Beds (Hospitals Only)

Enter the total number of beds in the hospital excluding bassinets and nursing-home-type units.

14.d Would You Be Willing To Furnish Cost Information on the Economic Impact of Current Regulations or any Future Proposed NRC Regulations that May Affect You?

Indicate if you would be willing to furnish additional economic data to the NRC that would help the NRC evaluate the economic impact of a rule on affected licensees.

4. AMENDMENTS TO A LICENSE

After you are issued a license, you must conduct your program in accordance with (1) the statements, representations, and procedures contained in your application, (2) the terms and conditions of the license, and (3) the Nuclear Regulatory Commission's regulations.

It is your obligation to keep your license current. You should anticipate the need for a license amendment insofar as possible. If any of the information provided in your application is to be modified or changed, submit an application for a license amendment. In the meantime, you must comply with the terms and conditions of your license until it is actually amended; NRC regulations do not allow you to implement changes on the basis of a submission requesting an amendment to your license.

An application for a license amendment may be prepared either on the application form (NRC Form 313) or in letter form and should be submitted in

duplicate to the address specified in this guide in Section 2, "Filing An Application." Your application should identify your license by number and should clearly describe the exact nature of the changes, additions, or deletions. References to previously submitted information and documents should be clear and specific and should identify the pertinent information by date, page, and paragraph. For example, if you wish to change the "responsible individual," your application for a license amendment should specify the new individual's name, training, and experience. The qualifications of the new individual should be equivalent to those specified in Item 7 of this regulatory guide.

You must send the appropriate fee for a license amendment with your application. The NRC will not accept an application for filing or processing before the proper fee is paid in accordance with § 170.12 of 10 CFR Part 170.

5. RENEWAL OF A LICENSE

Licenses are issued for a period of up to 5 years. You must send an application for renewal in duplicate to the address specified in Section 2 of this guide. You may submit an entirely new application for renewal as if it were an application for a new license without referring to previously submitted information.

As an alternative, you may:

1. Review your current license to determine whether the information accurately represents your current and anticipated program. Identify any necessary additions, deletions, or other changes and then prepare information appropriate for the required additions or changes.
2. Review the documents you have submitted in the past to determine whether the information in them is up to date and accurately represents your management control program, facilities, equipment, personnel, radiation safety procedures, locations of use, and any other information pertinent to your program. The documents you consider to represent your current program should be identified by date. Any out-of-date or superseded documents should also be identified, and changes should be made in the documents as necessary to reflect your current program.
3. Review NRC regulations to be sure that any changes in the regulations are appropriately covered in your program description.

4. After you have completed your review, submit two copies of a letter containing the information specified in Items 1, 2, and 3, as necessary, with the proper fee, requesting renewal of your license. If your current license and supporting documents accurately reflect your current program, state that operations will continue in accordance with these documents, applicable NRC regulations, and license conditions.

5. Include the name and telephone number of the person to be contacted about your renewal application and include your current mailing address if it is not indicated correctly on your license.

If you file your application for license renewal at least 30 days before the expiration date of your license and include the appropriate fee for license renewal, your present license will automatically remain in effect until the NRC takes final action on your application for renewal. However, if you file an application less than 30 days before the expiration date and the NRC cannot process it before that date, you would be without a valid license when your license expires.

It is important that the appropriate fee accompany your application for license renewal. In accordance with § 170.12 of 10 CFR Part 170, the NRC will not accept an application for filing or processing before the proper fee is paid.

If you do not wish to renew your license, you must dispose of all licensed radioactive material you possess in a manner authorized by §§ 20.301 and 20.311 of 10 CFR Part 20. Complete NRC Form 314, "Certificate of Disposition of Materials," and send it to the NRC before the expiration date of your license with a request that your license be terminated.

If you cannot dispose of all your licensed radioactive material before the expiration date, you must request a license renewal for storage only of the radioactive material. The renewal is necessary to avoid violating NRC's regulations that do not allow you to possess licensable material without a valid license.

APPENDIX A

<p>NRC FORM 313 (1-84) 10 CFR 30, 32, 33, 34, 35 and 40</p>	<p>U.S. NUCLEAR REGULATORY COMMISSION APPROVED BY OMB 3150-0120 Expires: 5-31-87</p>															
<h2 style="margin: 0;">APPLICATION FOR MATERIAL LICENSE</h2>																
<p>INSTRUCTIONS: SEE THE APPROPRIATE LICENSE APPLICATION GUIDE FOR DETAILED INSTRUCTIONS FOR COMPLETING APPLICATION. SEND TWO COPIES OF THE ENTIRE COMPLETED APPLICATION TO THE NRC OFFICE SPECIFIED BELOW.</p>																
<p>FEDERAL AGENCIES FILE APPLICATIONS WITH:</p> <p>U.S. NUCLEAR REGULATORY COMMISSION DIVISION OF FUEL CYCLE AND MATERIAL SAFETY, NMSS WASHINGTON, DC 20555</p> <p>ALL OTHER PERSONS FILE APPLICATIONS AS FOLLOWS, IF YOU ARE LOCATED IN:</p> <p>CONNECTICUT, DELAWARE, DISTRICT OF COLUMBIA, MAINE, MARYLAND, MASSACHUSETTS, NEW JERSEY, NEW YORK, PENNSYLVANIA, RHODE ISLAND, OR VERMONT, SEND APPLICATIONS TO:</p> <p>U.S. NUCLEAR REGULATORY COMMISSION, REGION I NUCLEAR MATERIAL SECTION B 631 PARK AVENUE KING OF PRUSSIA, PA 19406</p> <p>ALABAMA, FLORIDA, GEORGIA, KENTUCKY, MISSISSIPPI, NORTH CAROLINA, PUERTO RICO, SOUTH CAROLINA, TENNESSEE, VIRGINIA, VIRGIN ISLANDS, OR WEST VIRGINIA, SEND APPLICATIONS TO:</p> <p>U.S. NUCLEAR REGULATORY COMMISSION, REGION II MATERIAL RADIATION PROTECTION SECTION 101 MARIETTA STREET, SUITE 2900 ATLANTA, GA 30323</p>	<p>IF YOU ARE LOCATED IN:</p> <p>ILLINOIS, INDIANA, IOWA, MICHIGAN, MINNESOTA, MISSOURI, OHIO, OR WISCONSIN, SEND APPLICATIONS TO:</p> <p>U.S. NUCLEAR REGULATORY COMMISSION, REGION III MATERIALS LICENSING SECTION 799 ROOSEVELT ROAD GLEN ELLYN, IL 60137</p> <p>ARKANSAS, COLORADO, IDAHO, KANSAS, LOUISIANA, MONTANA, NEBRASKA, NEW MEXICO, NORTH DAKOTA, OKLAHOMA, SOUTH DAKOTA, TEXAS, UTAH, OR WYOMING, SEND APPLICATIONS TO:</p> <p>U.S. NUCLEAR REGULATORY COMMISSION, REGION IV MATERIAL RADIATION PROTECTION SECTION 611 RYAN PLAZA DRIVE, SUITE 1000 ARLINGTON, TX 76011</p> <p>ALASKA, ARIZONA, CALIFORNIA, HAWAII, NEVADA, OREGON, WASHINGTON AND U.S. TERRITORIES AND POSSESSIONS IN THE PACIFIC, SEND APPLICATIONS TO:</p> <p>U.S. NUCLEAR REGULATORY COMMISSION, REGION V MATERIAL RADIATION PROTECTION SECTION 1450 MARIA LANE, SUITE 210 WALNUT CREEK, CA 94596</p>															
<p>PERSONS LOCATED IN AGREEMENT STATES SEND APPLICATIONS TO THE U.S. NUCLEAR REGULATORY COMMISSION ONLY IF THEY WISH TO POSSESS AND USE LICENSED MATERIAL IN STATES SUBJECT TO U.S. NUCLEAR REGULATORY COMMISSION JURISDICTION.</p>																
<p>1. THIS IS AN APPLICATION FOR (Check appropriate item):</p> <p><input type="checkbox"/> A. NEW LICENSE</p> <p><input type="checkbox"/> B. AMENDMENT TO LICENSE NUMBER _____</p> <p><input type="checkbox"/> C. RENEWAL OF LICENSE NUMBER _____</p>	<p>2. NAME AND MAILING ADDRESS OF APPLICANT (Include Zip Code):</p>															
<p>3. ADDRESS(ES) WHERE LICENSED MATERIAL WILL BE USED OR POSSESSED:</p>																
<p>4. NAME OF PERSON TO BE CONTACTED ABOUT THIS APPLICATION _____ TELEPHONE NUMBER _____</p>																
<p>SUBMIT ITEMS 5 THROUGH 11 ON 8 1/2 x 11" PAPER. THE TYPE AND SCOPE OF INFORMATION TO BE PROVIDED IS DESCRIBED IN THE LICENSE APPLICATION GUIDE.</p>																
<p>5. RADIOACTIVE MATERIAL: a. Element and mass number, b. chemical and/or physical form, and c. maximum amount which will be possessed at any one time.</p>	<p>6. PURPOSE(S) FOR WHICH LICENSED MATERIAL WILL BE USED.</p>															
<p>7. INDIVIDUAL(S) RESPONSIBLE FOR RADIATION SAFETY PROGRAM AND THEIR TRAINING AND EXPERIENCE.</p>	<p>8. TRAINING FOR INDIVIDUALS WORKING IN OR FREQUENTING RESTRICTED AREAS.</p>															
<p>9. FACILITIES AND EQUIPMENT.</p>	<p>10. RADIATION SAFETY PROGRAM</p>															
<p>11. WASTE MANAGEMENT.</p>	<p>12. LICENSEE FEES (See 10 CFR 170 and Section 170.31):</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 70%;">FEE CATEGORY</td> <td style="width: 30%;">AMOUNT ENCLOSED \$</td> </tr> </table>	FEE CATEGORY	AMOUNT ENCLOSED \$													
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<p>13. CERTIFICATION: (Must be completed by applicant) THE APPLICANT UNDERSTANDS THAT ALL STATEMENTS AND REPRESENTATIONS MADE IN THIS APPLICATION ARE BINDING UPON THE APPLICANT. THE APPLICANT AND ANY OFFICIAL EXECUTING THIS CERTIFICATION ON BEHALF OF THE APPLICANT, NAMED IN ITEM 2, CERTIFY THAT THIS APPLICATION IS PREPARED IN CONFORMITY WITH TITLE 10, CODE OF FEDERAL REGULATIONS, PARTS 30, 32, 33, 34, 35, AND 40 AND THAT ALL INFORMATION CONTAINED HEREIN IS TRUE AND CORRECT TO THE BEST OF THEIR KNOWLEDGE AND BELIEF.</p> <p>WARNING: 18 U.S.C. SECTION 1001 ACT OF JUNE 25, 1948, 62 STAT. 743 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.</p>																
<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 30%;">SIGNATURE—CERTIFYING OFFICER</td> <td style="width: 30%;">TYPED/PRINTED NAME</td> <td style="width: 30%;">TITLE</td> <td style="width: 10%;">DATE</td> </tr> </table>		SIGNATURE—CERTIFYING OFFICER	TYPED/PRINTED NAME	TITLE	DATE											
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<p style="text-align: center;">14. VOLUNTARY ECONOMIC DATA</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 30%; vertical-align: top;"> <p>a. ANNUAL RECEIPTS</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 50%;"><input type="checkbox"/> < \$250K</td> <td style="width: 50%;"><input type="checkbox"/> \$1M—3.5M</td> </tr> <tr> <td><input type="checkbox"/> \$250K—500K</td> <td><input type="checkbox"/> \$3.5M—7M</td> </tr> <tr> <td><input type="checkbox"/> \$500K—750K</td> <td><input type="checkbox"/> \$7M—10M</td> </tr> <tr> <td><input type="checkbox"/> \$750K—1M</td> <td><input type="checkbox"/> > \$10M</td> </tr> </table> </td> <td style="width: 70%; vertical-align: top;"> <p>b. NUMBER OF EMPLOYEES (Total for entire facility excluding outside contractors)</p> <p>c. NUMBER OF BEDS</p> <p><input type="checkbox"/> YES <input type="checkbox"/> NO</p> </td> </tr> </table> <p>d. WOULD YOU BE WILLING TO FURNISH COST INFORMATION (Dollar and/or staff hours) ON THE ECONOMIC IMPACT OF CURRENT NRC REGULATIONS OR ANY FUTURE PROPOSED NRC REGULATIONS THAT MAY AFFECT YOU? (NRC regulations permit it to protect confidential commercial or financial—proprietary—information furnished to the agency in confidence)</p> <p><input type="checkbox"/> YES <input type="checkbox"/> NO</p>		<p>a. ANNUAL RECEIPTS</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 50%;"><input type="checkbox"/> < \$250K</td> <td style="width: 50%;"><input type="checkbox"/> \$1M—3.5M</td> </tr> <tr> <td><input type="checkbox"/> \$250K—500K</td> <td><input type="checkbox"/> \$3.5M—7M</td> </tr> <tr> <td><input type="checkbox"/> \$500K—750K</td> <td><input type="checkbox"/> \$7M—10M</td> </tr> <tr> <td><input type="checkbox"/> \$750K—1M</td> <td><input type="checkbox"/> > \$10M</td> </tr> </table>	<input type="checkbox"/> < \$250K	<input type="checkbox"/> \$1M—3.5M	<input type="checkbox"/> \$250K—500K	<input type="checkbox"/> \$3.5M—7M	<input type="checkbox"/> \$500K—750K	<input type="checkbox"/> \$7M—10M	<input type="checkbox"/> \$750K—1M	<input type="checkbox"/> > \$10M	<p>b. NUMBER OF EMPLOYEES (Total for entire facility excluding outside contractors)</p> <p>c. NUMBER OF BEDS</p> <p><input type="checkbox"/> YES <input type="checkbox"/> NO</p>					
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PRIVACY ACT STATEMENT ON THE REVERSE

APPENDIX A (Continued)

PRIVACY ACT STATEMENT

Pursuant to 5 U.S.C. 552a(e)(3), enacted into law by section 3 of the Privacy Act of 1974 (Public Law 93-579), the following statement is furnished to individuals who supply information to the Nuclear Regulatory Commission on NRC Form 313. This information is maintained in a system of records designated as NRC-3 and described at 40 Federal Register 45334 (October 1, 1975).

1. **AUTHORITY:** Sections 81 and 161(b) of the Atomic Energy Act of 1954, as amended (42 U.S.C. 2111 and 2201(b)).
2. **PRINCIPAL PURPOSE(S):** The information is evaluated by the NRC staff pursuant to the criteria set forth in 10 CFR Parts 30, 32, 33, 34, 35 and 40 to determine whether the application meets the requirements of the Atomic Energy Act of 1954, as amended, and the Commission's regulations, for the issuance of a radioactive material license or amendment thereof.
3. **ROUTINE USES:** The information may be (a) provided to State health departments for their information and use; and (b) provided to Federal, State, and local health officials and other persons in the event of incident or exposure, for their information, investigation, and protection of the public health and safety. The information may also be disclosed to appropriate Federal, State, and local agencies in the event that the information indicates a violation or potential violation of law and in the course of an administrative or judicial proceeding. In addition, this information may be transferred to an appropriate Federal, State, or local agency to the extent relevant and necessary for an NRC decision or to an appropriate Federal agency to the extent relevant and necessary for that agency's decision about you.
4. **WHETHER DISCLOSURE IS MANDATORY OR VOLUNTARY AND EFFECT ON INDIVIDUAL OF NOT PROVIDING INFORMATION:** Disclosure of the requested information is voluntary. If the requested information is not furnished, however, the application for radioactive material license, or amendment thereof, will not be processed. A request that information be held from public inspection must be in accordance with the provisions of 10 CFR 2.790. Withholding from public inspection shall not affect the right, if any, of persons properly and directly concerned need to inspect the document.
5. **SYSTEM MANAGER(S) AND ADDRESS:** U.S. Nuclear Regulatory Commission
Director, Division of Fuel Cycle and Material Safety
Office of Nuclear Material Safety and Safeguards
Washington, D.C. 20555

DRAFT VALUE/IMPACT STATEMENT

1. BACKGROUND

Among the licenses issued by the NRC are those for possession and use of byproduct material for calibrating radiation survey and monitoring instruments as a commercial service. Until now, the NRC has not provided formal guidance for preparing license applications for this use of byproduct material. Furthermore, the license applications were filed on Form NRC-313I, which was superseded in July 1984 by a new application form, NRC Form 313. It was decided that the NRC should issue a new regulatory guide conforming to the new NRC Form 313 and dealing exclusively with this type of commercial service.

2. PROPOSED ACTION

2.1 Description

An applicant for a license to use byproduct material for calibrating radiation survey and monitoring instruments must develop a program that complies with NRC regulations and describe this program in the license application. The proposed action is to issue a new regulatory guide that details commercial instrument calibration service requirements and provides guidance for establishing a program for the use of byproduct material in these service operations that would meet NRC regulatory requirements. The proposed action would provide guidance for preparing license applications in conformance with the new NRC Form 313.

2.2 Need

A new regulatory guide is needed to provide guidance that conforms to the new NRC Form 313 to license applicants for the use of byproduct material in commercial calibration services.

2.3 Value/Impact

2.3.1 NRC

The review and approval of applications for the use of byproduct material in certain commercial services would be considerably facilitated by the instruction and guidance to be provided in the proposed action. The new guide would clearly list the regulations to be followed and the information required for licensing and implementing an acceptable program for performing these services. Staff review time would be shortened because less correspondence would be needed to compensate for the lack of sufficient detail in license applications.

2.3.2 Other Government Agencies

Other government agencies would not be affected.

2.3.3 Industry

The proposed action would contribute to a reduction in the time required for preparing license applications. Applicants would spend less time trying to interpret NRC regulations and requirements for information. More importantly, the proposed action would provide information for the design and implementation of a more effective radiation safety program, thereby minimizing the exposure of workers to radiation.

2.3.4 Public

No impact on the public is foreseen.

2.3.5 Worker

The worker would benefit from the proposed action through reduced exposure to radiation as discussed in Item 2.3.3.

2.4 Decision on Proposed Action

A new regulatory guide should be prepared to provide guidance to applicants for preparing license applications for the use of byproduct material in commercial calibration services.

3. TECHNICAL APPROACH

Not applicable.

4. PROCEDURAL APPROACH

4.1 Alternatives

The alternative is to provide no specific guidance to applicants and to write individual letters to applicants.

4.2 Discussion

A regulatory guide is the most effective way to transmit information about regulations and licensing requirements. A regulatory guide ensures uniform transmission of information to applicants. Individual letters would be inefficient and, depending on the reviewing official, may not uniformly convey the same information to each applicant. Issuance of a new regulatory guide is the most effective alternative.

5. STATUTORY CONSIDERATIONS

5.1 NRC Authority

Authority for the proposed action is derived from the Atomic Energy Act of 1954, as amended, and the Energy Reorganization Act of 1974, as amended, and implemented through the Commission's regulations.

5.2 Need for NEPA Assessment

Issuance or amendment of guides for the implementation of regulations in Title 10, Chapter I, of the Code of Federal Regulations is a categorical exclusion under paragraph 51.22(c)(16) of 10 CFR Part 51. Thus, an environmental impact statement or assessment is not required for this action.

6. RELATIONSHIP TO OTHER EXISTING OR PROPOSED REGULATIONS OR POLICIES

No conflicts or overlaps appear to exist.

7. SUMMARY AND CONCLUSIONS

The regulatory guide, when disseminated, will assist the NRC in its review of applications for the use of byproduct material in commercial calibration services and will provide applicants with guidance on submitting applications that conform to the new NRC Form 313. The proposed regulatory guide should be issued.

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

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