

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, 39, 40, and 70, 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.

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Licensee		
1. Integrated Technologies, Inc.		3. License Number 06-30317-01
2. 316-1 Boston Post Road Waterford, Connecticut 06385		4. Expiration Date August 31, 2001
		5. Locket or Reference No. 030-34177
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
A. Iridium 192	A. Sealed radiography source contained in a source assembly registered pursuant to 10 CFR 32.210 or an equivalent Agreement State Regulation	A. Not to exceed 100 curies per source and 1500 curies total except as specified by Condition No. 12
B. Cobalt 60	B. Sealed radiography source contained in a source assembly registered pursuant to 10 CFR 32.210 or an equivalent Agreement State Regulation	B. Not to exceed 100 curies per source and 300 curies total except as specified by Condition No. 12
C. Cesium 137	C. Sealed source	C. Not to exceed 200 microcuries per source and 400 microcuries total
D. Gadolinium 153	D. Sealed source (Amersham Model LS-82)	D. Not to exceed 1 millicurie per source and 4 millicuries total
E. Depleted Uranium	E. Metal	E. 999 kilograms
9. Authorized use		
A. through B. For use in a compatible radiographic exposure device registered pursuant to 10 CFR 32.210 or an equivalent Agreement State regulation for performing industrial radiography and in a compatible source changer registered pursuant to 10 CFR 32.210 or an equivalent Agreement State Regulation for source storage and exchange.		
C. For use in an Amersham Model 773 Calibrator for the calibration of the licensee's radiation detection equipment.		
D. For use in a LIXI Imaging Scope for x-ray analysis.		
E. Shielding for radiographic equipment.		

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**MATERIALS LICENSE
SUPPLEMENTARY SHEET**

License Number

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030-34177

CONDITIONS

10. A. Licensed material may be stored at the licensee's facilities located at 316-1 Boston Post Road, Waterford, Connecticut, and may be used only at temporary job sites of the licensee anywhere in the United States where the U.S. Nuclear Regulatory Commission maintains jurisdiction for regulating the use of licensed material.
- B. The licensee may not possess and use materials authorized in Items 6, 7, and 8, until: (1) the licensee has constructed the facilities and obtained the equipment described in the application and supporting documentation; and (2) the U.S. Nuclear Regulatory Commission, Region I, ATTN: Chief, Nuclear Materials Safety Branch, 475 Allendale Road, King of Prussia, Pennsylvania 19406 has been notified in writing that activities authorized by the license will be initiated.
- In accordance with the requirements set forth in 10 CFR 30.36(b), 40.42(b), and 70.38(h), the licensee shall promptly notify the Nuclear Regulatory Commission, in writing, of a decision not to complete the facility, acquire equipment, or possess and use authorized material.
11. A. Licensed material shall be used by, or under the supervision and in the physical presence of individuals who have been designated in writing by the Radiation Safety Officer and have been trained:
- A. As specified in the application dated June 10, 1996 and the letter dated August 12, 1996; and
- B. In accordance with the provisions of 10 CFR 34.31.
- B. The Radiation Safety Officer for this license is David M. Orlosky.
12. The licensee is authorized to receive, possess, and use sealed sources of iridium-192 or cobalt-60 where the radioactivity exceeds the maximum amount of radioactivity specified in this license provided:
- A. such possession does not exceed the quantity per source specified in Item 8 by more than 20% for iridium-192 or 10% for cobalt-60; and
- B. records of the licensee show that no more than the maximum amount of radioactivity per source specified in this license was ordered from the supplier or transferor of the byproduct material; and
- C. the levels of radiation for radiographic exposure devices and storage containers do not exceed those specified in 10 CFR 34.21.
13. A. Notwithstanding the periodic leak test required by 10 CFR 34.25(b), the requirement does not apply to radiography sources that are stored and not being used. The sources excepted from this test shall be tested for leakage before use or transfer to another person. No sealed source shall be stored for a period of more than 10 years without being tested for leakage and/or contamination.

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- B. Sealed sources authorized for a use other than radiography shall be tested for leakage in accordance with 10 CFR 34.25.
14. Notwithstanding the requirements of 10 CFR 34.20(a), and pursuant to 10 CFR 34.51, radiographic equipment authorized for use in radiographic operations under this license need not comply with the torque criteria of Section 8.9.2(c) of American National Standard N432-1980.
15. Sealed sources or detector cells containing licensed material shall not be opened or sources removed from source holders by the licensee.
16. The licensee is authorized to transport licensed material in accordance with the provisions of 10 CFR Part 71, "Packaging and Transportation of Radioactive Material."
17. 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. The 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 June 10, 1996 with attached Radiation Safety Procedures Manual
B. Letter dated August 12, 1996

Date AUG 20 1996

For the U.S. Nuclear Regulatory Commission

ORIGINAL SIGNED BY:

By

PENNY A. LANZISERA

Division of Nuclear Materials Safety
Region I
King of Prussia, Pennsylvania 19406

AUG 20 1996

License No. 06-30317-01
Docket No. 030-34177
Control No. 123331

David M. Orlosky
Radiation Safety Officer
Integrated Technologies, Inc.
316-1 Boston Post Road
Waterford, CT 06385

Dear Mr. Orlosky:

Please review the enclosed document carefully and be sure that you understand all conditions. If there are any errors or questions, please notify the U.S. Nuclear Regulatory Commission, Region I Office, Licensing Assistance Team, (610) 337-5093 or 5239, so that we can provide appropriate corrections and answers.

Please note that your license has been written in a format compatible with the changes to the regulations in 10 CFR Part 34. Your licensed material activities must be conducted in accordance with these revised regulations. Please note that all newly manufactured radiographic exposure devices and associated equipment acquired after January 10, 1992 and all radiographic exposure devices and associated equipment in use after January 10, 1996 shall comply with the requirements of 10 CFR 34.20.

Please be advised that your license expires at the end of the day, in the month, and year stated in the license. Until your license is terminated, you must conduct your program involving byproduct materials in accordance with the conditions of your NRC license, representations made in your license application, and NRC regulations. In particular, note that you must:

1. Operate in accordance with NRC regulations 10 CFR Part 19, "Notices, Instructions and Reports to Workers; Inspections," 10 CFR Part 20, "Standards for Protection Against Radiation," and other applicable regulations.
2. Not possess and use materials authorized in Items 6, 7, and 8, on the license until:
 - a. you have constructed the facilities and obtained the equipment described in the license application and supporting documentation; and
 - b. you have notified the U.S. Nuclear Regulatory Commission, Region I, ATTN: Chief, Nuclear Materials Safety Branch, 475 Allendale Road,

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King of Prussia, Pennsylvania 19406 in writing, that activities authorized by the license will be initiated.

3. Notify NRC, in writing, within 30 days:
 - a. when an authorized user or Radiation Safety Officer, permanently discontinues performance of duties under the license or has a name change; or
 - b. when the mailing address on the license changes (no fee is required if the location of byproduct material remains the same).
4. In accordance with 10 CFR 30.36(b) and/or license condition, notify NRC, promptly, in writing, and request termination of the license:
 - a. when you decide to terminate all activities involving materials authorized under the license; or
 - b. if you decide not to complete the facility, acquire equipment, or possess and use authorized material.
5. Request and obtain a license amendment before you:
 - a. permit anyone to work as an authorized user under the license;
 - b. change Radiation Safety Officer;
 - c. order byproduct material in excess of the amount, or radionuclide, or form different than authorized on the license;
 - d. add or change the areas of use, or address or addresses of use identified in the license application or on the license; or
 - e. change ownership of your organization.
6. Submit a complete renewal application with proper fee or termination request at least 30 days before the expiration date of your license. You will receive a reminder notice approximately 90 days before the expiration date. Possession of byproduct material after your license expires is a violation of NRC regulations. A license will not normally be renewed, except on a case-by-case basis, in instances where licensed material has never been possessed or used.

In addition, please note that NRC Form 313 requires the applicant, by his/her signature, to verify that the applicant understands that all statements contained in the application are true and correct to the best of the applicant's knowledge. The signatory for the application should be the licensee or a certifying official of the licensee rather than the Radiation Safety Officer or a consultant.

David M. Orlosky
Integrated Technologies, Inc.

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You will be periodically inspected by the NRC. Failure to conduct your program in accordance with NRC regulations, license conditions, and representations made in your license application and supplemental correspondence with NRC will result in enforcement action against you. This could include issuance of a notice of violation, or imposition of a civil penalty, or an order suspending, modifying or revoking your license as specified in the "General Statement of Policy and Procedure for NRC Enforcement Actions," (Enforcement Policy), NUREG 1600.

Since serious consequences to employees and the public can result from failure to comply with NRC requirements, prompt and vigorous enforcement action will be taken when dealing with licensees who do not achieve the necessary meticulous attention to detail and the high standard of compliance which NRC expects of its licensees.

Thank you for your cooperation.

Sincerely,

ORIGINAL SIGNED BY:

PENNY A. LANZISERA

for Sheri A. Arredondo
Division of Nuclear Materials Safety

License No. 06-30317-01
Docket No. 030-34177
Control No. 123331

Enclosures:

1. License No. 06-30317-01
2. 10 CFR Parts 2, 19, 20, 30, and 170
3. NRC Forms 3 and 313

DOCUMENT NAME: R:\WPS\MLTR\L0630317.01

To receive a copy of this document, indicate in the box: "C" = Copy w/o attach/encl "E" = Copy w/ attach/encl "N" = No copy

OFFICE	DNMS/RI	N	DNMS/RI				
NAME	Arredondo PL for						
DATE	08/09/96	08/	/96	08/	/96	08/	/96

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iTi | **integrated Technologies, inc.**

316-1 Boston Post Road
Waterford, CT 06385

tel: (860) 447-2474
fax: (860) 447-2404

August 12, 1996

Licensing Assistant Section
Attn: Ms. Sheri Arredondo
Nuclear Materials Safety Board
USNRC Region I
475 Allendale Road
King of Prussia, PA 19406-1415

MS 16
P-3

Subject: Clarification to Radiation Safety Procedures Manual Content

Reference: Mail Control No. ~~12331~~
123331

Dear Ms. Arredondo:

This letter is in response to our phone conversation on August 9, 1996, during which you conveyed to me the need to provide clarifications to our Radiation Safety Procedures Manual. Our clarifications are as follows:

Radiographer Training

The Radiation Safety Procedures Manual (RSPM) includes Attachment E which outlines the safety training requirements for radiographic personnel. While this is only an outline, it does not specifically address by line item all of the material to be covered in the training session. The following items will be covered during Course A, B, C, and D instruction as applicable.

- Detection instrument usage and its limitations (See page 15 of 62)
- Proper use and daily checks required prior to use (See page 15 of 62)
- Proper survey techniques (See page 25 of 62, para. 7.2.16)
- Alarming rate meters usage and daily checks required prior to use (See page 16 of 62)
- Calibration requirements for radiation safety equipment (See page 15 of 62, para. 5.2.3)
- Case histories of radiation instruments (See Course D)
 - cause
 - consequences
 - actions to prevent recurrence
- Familiarization with remote tooling used in source retrieval and techniques (for experienced radiographers)

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123331
AUG 14 1996



integrated Technologies, inc.

316-1 Boston Post Road
Waterford, CT 06385

tel: (860) 447-2474
fax: (860) 447-2404

Annual Training Requirements

All radiographic personnel will receive annual refresher safety training of at least four hours. Material covered will be any new or changed requirements in the applicable Code of Federal Regulations, RSPM, and information notices of violations by other licensees. Periodically during the year, informal training will also be given as the RSC deems appropriate.

Quarterly Inventory

Quarterly inventory of by-product material will be performed in accordance with 10 CFR 34.26.

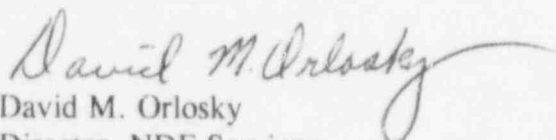
Leak Tests of Sources

All sources will be leak tested every 6 months, unless sources are being stored and not used. Sources will be leak tested before being put into service. Amersham leak test kits will be used. Other licensed vendor test kits may be used, if required.

I hope you find our responses acceptable. Where required, the items herein will be incorporated into **iTi's** RSPM.

Thank you for expediting the review of our application and RSPM. If you have any further questions, please call me at (860) 447-2474. Also, if feasible, please fax a copy of our license on Wednesday, Aug. 14, 1996.

Very truly yours,


David M. Orlosky
Director, NDE Services

TELEPHONE CONVERSATION LOG

DATE:

8/9/96

PERSON CALLED:

David Orlosky

ORGANIZATION:

ITI

TELEPHONE NUMBER:

860-447-2474

LICENSE NUMBER:

06-30317-01

#123331

PERSON CALLING:

Sheri A. Arredondo
USNRC Region I
475 Allendale Road
King of Prussia, PA 19406

(215) 337-5342
FAX Numbers
(215) 337-5269 or
(215) 337-5234

SUMMARY:

Licensee needs to submit

1) Add'l topics for training:

- limitations
- survey techniques
- alarm ratemeters
- remote handling equipment
- case histories

2) Periodic training

3) Quarterly inventory

4) name of leak test supplier

ACTION:

MSIS

SIGNATURE:

SA

DATE:

8/9/96

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To: Integrated Technologies
Inc.

06-30317-01

9/13/96

LTS Sheet
wasn't attached
when received
from RI as a
completed piece.
BR

I (48)

Log	June 18
Member	
Check No.	1007
Amount	\$3700.00 / \$200
Due Date	30
Payment	APP
Check Pk'd	7/15/96
File Completed	BR
By	

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