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Radiation Safety Services
ATTN: Eli A. Port
President
827 Simpson Street
Evanston, IL 60201

Gentlemen:

This is in response to your letters dated May 10 and June 10, 1985 in which you request amendments to and seek clarification of why certain authorizations were not included in your NRC License Number 12-20424-01. These requests and clarifications were discussed in a meeting between Mr. Port, of your staff, and William Axelson, Jack Hind, and me, of the NRC, on June 12, 1985. As discussed, we have authorized changes in your Radiation Safety Officer and authorized users in an amendment enclosed with this letter in order for you to continue operation in an effective manner. However, in order to obtain authorization for the other items requested in your letters and your original applicaiton for a license, you need to submit additional information and/or clarification. We have categorized your request and concerns, along with our responses or requests for additional information as follows:

1. Type C license of broadscope for research and development for use at your laboratory at 10 West 35th Street, Chicago, Illinois.

We assumed, from your April 5, 1984 letter to us, that you were withdrawing your request for a Type C broad for both temporary job sites and your laboratory. However, as per our discussion on June 12, 1985, we made the incorrect assumption and you desire to be authorized to perform some research in your laboratory utilizing materials with atomic numbers 1-83. In order to obtain this authorization, you need to submit the following:

- a. A description of the intended use of the radionuclides. Although this description should be general enough to allow for all the uses you anticipate, it should also provide sufficient information to enable us to determine procedures and facilities necessary for your program. If any of the following items will be in your program, you will need to submit handling procedures, facilities, access control, etc. specific to this use (Information on the type of information needed for these types of applications may be obtained from us):
 - (1) Use in animals
 - (2) Synthesis of labelled compounds
 - (3) Fabrication of sealed sources
 - (4) Use of gauges

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- b. A description or diagram of each area where material will be used. The description should include adjacent areas, any necessary shielding, access control, other necessary facilities such as a hood for iodinations and the intended use of each area (e.g., waste disposal, animal housing, etc.). If your facility is in a multi-tenant building, describe the amount of radioactive material, if any, that will be released to unrestricted areas occupied by other tenants and the mechanisms you will utilize to monitor and maintain these levels less than those specified in Sections 20.105 and 20.106 of 10 CFR Part 20.
- c. If your intended use will include analyzing samples from facilities that may contain unknown or large amounts of gamma emitting radionuclides, please indicate the procedures you will utilize to minimize the potential exposure to shipping, receiving, or security personnel.

2.. Use of barium-133 sealed reference sources

Your original application did request these sources for instrument calibration, and we inadvertently did not include them in the license. We have included them in the amendment enclosed with this letter.

3. Use of cobalt-60, cesium-137 and iridium-192 for instrument calibration at temporary job sites.

Your application did request the use of these sources in devices for instrument calibration. However, we cannot authorize you to use sources in devices under your clients' licenses as requested unless the clients amend their licenses to include your personnel as authorized users for instrument calibration. We can authorize you to take possession of the sources and devices, as transferred from your clients to you and utilize them under your license for instrument calibration. After each calibration is complete, you would then transfer the sources and devices back to your clients. Both transfers would need to be in accordance with Section 30.41 of 10 CFR Part 30. (Note: In this authorization, each client would need to amend his/her license to include instrument calibration by your firm). In order to obtain this authorization you need to submit the following:

- a. A list of the radionuclides, activities, names of manufacturers, and model numbers for the sources and devices you desire to utilize.
- b. The training (topics, duration, instructor, and method of determining competency) that will be provided to your authorized users in the use of these sources and devices for the calibration of instruments.

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- c. The emergency and operating procedures to be utilized specific to the use of radiographic devices, if these type of devices will be utilized. The procedures should include the items specified in Section 34.21 of 10 CFR Part 34 such as locking of devices with sources in shielded positions, surveys of guide tubes after each calibration to ensure that sources have been retracted to the shielded position, and the mechanism for retrieval of sources that have been disconnected from cables.
- d. The method utilized to ensure the accuracy of the sources.

Please note that the method of utilizing an NBH calibrated transfer instrument as referred to in your May 10, 1985 letter was authorized in your license.

4. Authorized users

As discussed in our meeting, we agree that you can be authorized to designate individuals as authorized users for collection, transportation and analysis of samples in accordance with the criteria specified in your May 10, 1985 letter. Consequently, the amendment enclosed with this letter modified Condition 12 to include this authorization.

5. Request to have information considered proprietary

Your April 5, 1984 stated that you wish all the information furnished in connection with your application to be withheld from public disclosure per 10 CFR 2.790. As specified in a January 4, 1985 letter to all NRC Material Licensees (copy enclosed), however, you must request withholding in accordance with the procedures specified in Section 2.790. Failure to follow this procedures may result in disclosure of the information to the public, as apparently occurred recently in your case and discussed in our meeting. Please note that any request for withholding is subject to an NRC determination as to whether the document may be actually withheld in accordance with applicable laws and regulations. Please reevaluate what is considered to be proprietary and clearly identify these or portions thereof as required by Section 2.790.

6. Device specific training for service operations

As discussed in our meeting, device specific training is necessary for each service operation that involves or has the potential of involving the sources containing radioactive material or any portion of a device that affects emanative radiation levels (i.e., shutter, shielding, electrical control of shutter, etc.).

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7. Change in Radiation Safety Officer (RSO)

We are concerned about the availability of your proposed RSO, Cindy Bloom, to your program, since she is the RSO at 2 other broadscope licensees and your program has the potential of involving the RSO in radiation safety problems at several different locations. Please specify the availability of Ms. Bloom in regard to response to emergencies (e.g., onsite contact, time to respond, if a concurrent incident requiring her involvement is occurring at one of the broadscope licensees, etc.), provisions for an alternate when she is unavailable, and mechanism for monitoring all programs at the same time. We realize that Mr. Derenzo has left your firm, and therefore, as discussed in our meeting, have authorized Mr. Port as your RSO until we complete our review and take final action on your request to change to Ms. Bloom.

8. Modify authorizations to include analysis of any sample containing any byproduct material.

We can authorize you to possess any byproduct material incident to the collection, transportation and analysis of samples as requested, if you submit the following:

- a. A description of each type of sample, along with any special handling procedures needed (e.g., samples from reactor facilities require knowledge of the radionuclides and activities present to ensure against unnecessary radiation exposure to personnel and that you have adequate instrumentation and reference standards to accurately analyze). In addition, specify the maximum activity that you expect to receive per sample.
- b. The training and experience that will be required for individuals handling samples where there is a potential for significant radiation exposures.

9. Analysis of samples at temporary job sites

Your original application appeared to only request the collection and not analysis of samples at temporary job sites, since your instructions and/or procedures indicated that samples would be analyzed only at Radiation Safety Services, Ten West 35th Street, Chicago, Illinois. We cannot authorize you to perform analysis of any sample at temporary job sites, since some of these samples may be such activities and forms (e.g., liquid) that require special fixed facilities for contamination and exposure control. We can authorize you, however, to analyze leak test samples at temporary job sites. In order to obtain this authorization, you will need to submit the following:

- a. A description of the criteria you will utilize for the area in which the analysis will be performed (e.g., area should have access control and take precautions against potential spread of contamination, etc.).

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- b. The procedures utilized to ensure that the instruments used to analyze samples are functioning properly after transport at each location of use.
- c. Procedures for ensuring that no sources of licensed material will be left at the site.

If you have any questions or require clarification on any of the information stated above, you may contact us at (312) 790-5625.

Sincerely,

Original Signed By
Bruce S. Mallett
Materials Licensing Section

Enclosure: Amendment No. 01

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