

34-20292-02  
030-32109



January 9, 1997

Charles Gill  
United States Nuclear Regulatory Commission  
Office of Nuclear Material Safety and Safeguards  
Washington, D C. 20555

Reference: Transfer of Nuclear Density Gauges

Dear Mr. Gill,

In support of the current Materials license application submitted by Prime Engineering, Inc., the below listed information is provided for your review. Upon issuance of a license to Prime Engineering, Inc., several nuclear density gauges will be transferred to them by R&R International, Inc.

1. *The new name of the licensed organization. If there is no change, the licensee should so state.*

R&R International, Inc. will retain its current Materials license without change. However 4 (four) NRC regulated units will be transferred to Prime Engineering, Inc., 1038 Ghent Road Akron, Ohio 44321 upon their receiving an NRC license authorizing them to use such devices.

2. *The new licensee contact and telephone number(s) to facilitate communications.*

On behalf of Prime Engineering, Inc., Susheela Suguness (President) (614) 799-2222, and Stephen Mileski (RSO) (330) 666-5432, will be points of contact.

3. *Any changes in personnel having control over licensed activities (e.g., officers of a corporation) and any changes in personnel named in the license such as radiation safety officer authorized users, or any other persons identified in previous license applications as responsible for radiation safety or use of licensed material. The license should include information concerning the qualifications, training, and responsibilities of new individuals.*

There will be no change in personnel on behalf of R&R International, Inc.; P. David Gura will continue as R&R's RSO. Prime Engineering, Inc. will appoint Mr. Stephen Mileski as their RSO and authorize several Prime Engineering, Inc. employees to use the density gauges. Please see attachment A for designated personnel and training qualifications.

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REGION III



4. *An indication of whether the transferor will remain in non-licensed business without the license.*

R&R International, Inc. will continue to possess a Material license and use density gauges. Prime Engineering, Inc. is applying for a separate license authorizing them to possess and use source material.

5. *A complete, clear description of the transaction, including any transfer of stocks or assets, mergers, etc., so that legal counsel is able, when necessary, to differentiate between name changes and changes of ownership.*

Please see attachment B for a description of transaction details.

6. *A complete description of any planned changes in organization, location, facility, equipment, or procedures (i.e., changes in operating or emergency procedures).*

R&R International, Inc. will continue using their current storage location and corresponding procedures. Prime Engineering, Inc. will establish a storage location and corresponding Radiation plan and procedures to accommodate the source material referenced in their application. Please see attachment C for site drawings and Radiation plan in support of Prime Engineering, Inc.

7. *A detailed description of any changes in the use, possession, location or storage of the licensed materials.*

The transferred equipment will be used to perform soil density measurements by Prime Engineering, Inc. Please reference item 6 (six) and attachment C.

8. *Any changes in organization, location, facilities, equipment, procedures, or personnel that would require a license amendment even without the change of ownership.*

The license currently possessed by R&R International, Inc. will not require a license amendment.

9. *An indication of whether all surveillance items and records (e.g., calibrations, leak tests, surveys, inventories, and accountability requirements) will be current at the time of transfer. A description of the status of all surveillance requirements and records should also be provided.*

R&R International's leak tests records and equipment inventories are current for the sources referenced in their Material license. These records as well as any other surveillance items have been disclosed to Prime Engineering, Inc. There are no open inspection items at this time. Please see attachment D for leak test and inventory records.



10. *Confirmation that all records concerning the safe and effective decommissioning of the facility, pursuant to 10 CFR 30.35(g), 40.36(f), 70.25(g), and 72.30(d); public dose; and waste disposal by release to sewers, incineration, radioactive material spills, and on-site burials, have been transferred to the new licensee, if licensed activities will continue at the same location, or to the NRC for license termination.*

R&R International, Inc. does not intend to decommission its storage facility and has not engaged in any disposal of Radioactive waste. Consequently there are no related decommissioning records to provide to the transferee.

11. *A description of the status of the facility. Specifically, the presence or absence of contamination should be documented. If contamination is present, will decontamination occur before transfer? If not, does the successor company agree to assume full liability for the decontamination of the facility or site?*

R&R International, Inc. does not intend to transfer its storage facility to Prime Engineering, Inc.

12. *A description of any decontamination plans, including financial assurance arrangements of the transferee, as specified in 10 CFR 30.35, 40.36, and 70.25. This should include information about how the transferee and transferor propose to divide the transferor's assets and responsibility for cleanup needed at the time of transfer.*

Due to the nature of only a limited number of nuclear density gauges being transferred from R&R International, Inc. to Prime Engineering, Inc. and the fact that R&R International, Inc. will continue to maintain a Material's license, there is no applicable facility decontamination activities scheduled.

13. *Confirmation that the transferee agrees to abide by all commitments and representations previously made to NRC by the transferor. These include, but are not limited to: maintaining decommissioning records required by 10 CFR 30.35(g); implementing decontamination activities and decommissioning of the site; and completing corrective actions for open inspection items and enforcement actions. With regard to contamination of facilities and equipment, the transferee should confirm, in writing, that it accepts full liability for the site, and should provide evidence of adequate resources to fund decommissioning; or the transferor should provide a commitment to decontaminate the facility before change of control or ownership. With regard to open inspection items, etc., the transferee should confirm, in writing, that it accepts full responsibility for open inspection items and/or resulting enforcement actions; or the transferee proposes alternative measures for meeting the requirements; or the transferor provides a commitment to close out all such actions with NRC before license transfer.*

All parties agreed to comply with 10 CFR 30.35(g) in the future in the event that decommissioning is required.



14 *Documentation that the transferor and transferee agree to the change in ownership or control of the licensed material and activity, and the conditions of transfer; and the transferee is made aware of all open inspection items and its responsibility for possible resulting enforcement actions.*

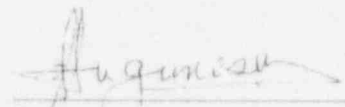
Transferor (R&R International, Inc.) has made available to the transferee (Prime Engineering, Inc.) all applicable records for inspection and review. Both parties have agreed to the transfer of 4 (four) NRC regulated density gauge units.

15 *A commitment by the transferee to abide by all constraints, conditions, requirements, representations, and commitments identified in the existing license. If not, the transferee must provide a description of its program to ensure compliance with the license and regulations.*

Having reviewed the conditions, limitations, and authorized activities contained in R&R International's current license, the transferee (Prime Engineering, Inc.) is agreeable to the conditions applicable to those source units that will be transferred.

Should any additional information be required please contact the appropriate RSO representatives, identified in this document or the undersigned parties.

  
\_\_\_\_\_  
GM Rana  
Chairman, CEO, R&R International, Inc.

  
\_\_\_\_\_  
Susheela Suguness  
President, Prime Engineering, Inc.

## APPENDIX A



## RESUME

*Stephen E. Mileski*  
*Staff Geologist*

### EDUCATION

- 1991 - BS, Geology
- 1991 - BA, Anthropology

### QUALIFICATIONS SUMMARY

Mr. Mileski has experience in management and field supervision of both geotechnical and environmental projects since 1991. His experience includes geotechnical and environmental subsurface investigations and field studies; laboratory supervision and testing of soil, rock, concrete, and asphalt; soil and rock exploration; pavement evaluation and sampling; bridge and building foundation evaluation, sampling, monitoring, and testing; slope stability studies, including inclinometer installation and monitoring; earth retaining structure investigations; settlement estimation; landslide investigations; monitoring well installation; hydrogeological studies; and deep tunnel instrumentation installation and monitoring. He has successfully participated in and completed several projects involving roadways, bridges, buildings, watermains, sewers, treatment plants, retaining walls, embankments, and excavations. He is proficient in the use of computer programs for geotechnical analysis and preparation of technical reports. He also has thorough knowledge of the application of geotechnical specifications and standards such as Ohio Department of Transportation, Pennsylvania Department of Transportation, Federal Aviation Administration, Federal Highway Administration, American Association of State Highway Transportation Officials (AASHTO), and American Society for Testing and Materials (ASTM).

### SYNOPSIS OF EXPERIENCE

- Management
  - Project Management
  - Laboratory Technician Training
  - Field Supervisor
  - Lab Supervisor
- Environmental Services
  - Subsurface Investigations
  - Monitoring Well Installation
  - Phase I and Phase II Studies
- Structural Engineering
  - Inspection and Testing of Existing Structures
  - Supervision of Inspection and Testing



## RESUME

**Stephen E. Mileski**  
**Staff Geologist**

### SYNOPSIS OF EXPERIENCE (cont.)

- **Geotechnical Engineering**
  - Subsurface Investigation and Monitoring Well Installation
  - Laboratory Testing
  - Materials Testing
  - Construction Inspection
- **Field Services**
  - Soil Gas Surveys
  - Field Screening/Sampling
  - GPR Surveys

### SPECIFIC EXPERIENCE

**URS Consultants, Inc.; Bridge No. CUY-1R271-0232 L/R-Cuyahoga County, OH.**

*Field Geologist/Laboratory Testing Supervisor:* This project involved the geotechnical investigation of an 1100 feet long, 14 span bridge on Interstate Route 271 in accordance with the Ohio Department of Transportation (ODOT) specifications. Responsibilities included research into local and regional geology, site reconnaissance, location of soil test borings, subcontractor management, supervision of drilling and laboratory testing activities, and assistance in the preparation of a technical report and full-size plans on mylars for inclusion into final construction plans and specifications.

**ms consultants, inc.; MED-18-16.08 Roadway Improvements - Medina County, OH.**

*Field Supervisor/Geologist/Laboratory Supervisor:* ODOT plans to reconstruct approximately 5.5 miles of State Route 18 to improve vertical alignment and to rehabilitate the existing pavement, drainage facilities, and access roads. R&R Geotechnical personnel managed a complex drilling program involving 72 test borings while maintaining roadway traffic. Services provided also entailed laboratory testing and preparation of a technical report including existing pavement evaluation, recommendations concerning pavement design and construction, and removal of unsuitable soils.

**Adache, Ciuni, Lynn Associates, Inc.; POR 44/5 Landslide Study - Portage County, OH.**

*Field and Laboratory Testing Supervisor:* A 3,700 foot section of roadway embankment had experienced slope failure on S.R. 44 in Portage County. The embankment slope stability had impacted portions of the pavement. Mr. Mileski supervised the field portion of the geotechnical investigation of the existing embankment. He was also responsible for laboratory testing of the samples in order to determine the soil type, soil density, moisture content, existing drainage conditions and other engineering properties necessary for the proper recommendations included in the technical report.





## RESUME

### *Stephen E. Mileski Staff Geologist*

#### **Ohio Turnpike Commission (OTC): Construction Inspection - Ohio Turnpike, OH.**

Laboratory Supervisor/Field Geologist: This project involved the construction of two toll plazas with connecting bridges and on and off ramps as well as numerous electrical, computer, and telecommunication hook-ups. Mr. Mileski acted as the field geologist and laboratory supervisor of the geotechnical investigation which included several roadway and structural borings and the testing of the soil and rock recovered from these sites. Mr. Mileski also acted as field geologist and laboratory supervisor during construction. He was responsible for the majority of the physical testing of soil, aggregate, concrete and other material used during construction. All of these materials were tested in accordance with ODOT, AASHTO, and ASTM specifications. He was responsible for the daily tracking and logging of daily field reports and test results as well as communication with on-site engineers and field technicians which were vital for timely completion of each project.

#### **Regional Transit Authority: Inspection of RTA Bridges-Cleveland, OH.**

Field Supervisor and Inspector: R&R Geotechnical personnel were responsible for the inspection and materials testing of the existing RTA bridges including concrete coring operations and QA/QC of the ultrasonic testing of the existing steel. Mr. Mileski helped supervise and participate in the field and laboratory testing portions of these projects as well as assisting in the writing of the technical reports.

#### **E.J. DeBartolo & Associates Co.: Summit Mall Parking Lot Pavement Evaluation - Akron, OH.**

Field Geologist/Laboratory Testing Supervisor: Approximately 200,000 square yards of the existing pavement of the mall parking lot experienced distress, cracking, and spalling. The pavement conditions evaluation program included obtaining 20 pavement cores. R&R Geotechnical personnel were responsible for the management of coring operations, visual examination of the cores and the pavement, analysis of the pavement strength, subgrade moisture and density, preparation of a technical document including recommendations for pavement correction methods, and further soils investigation.

#### **The University of Akron: E.J. Thomas Hall Fountain Settlement Study - Akron, OH.**

Field Geologist/Laboratory Testing Supervisor: The water fountain outside the E.J. Thomas Hall has experienced uneven settlement over a period of time. During repairs, voids were detected underneath the foundations. R&R Geotechnical was contacted to determine the cause of settlement. R&R performed three borings and five concrete cores and determined that the foundation was constructed over loose fill. Since bedrock was encountered at shallow depths in the test borings, R&R recommended underpinning the foundation to stop the settlement.

#### **Louis Berger & Associates Inc.: Elkton Federal Prison - Elkton, OH.**

Field Supervisor and Geologist/Soil and Rock Testing Supervisor: This federal project involved an extensive subsurface investigation over a large and undulating site. The majority of the subsurface investigation and testing involved rock which was to be removed through blasting and ripping, thus identification of coal seams and rock hardness were vital. The field portion of this project was completed under very tight time constraints and under very extreme conditions by utilizing three out-of-state drilling subcontractors who were located through the persistent efforts of our geotechnical personnel.





## RESUME

### *Stephen E. Mileski* *Staff Geologist*

**Affholder, Inc.: Hilltop Interceptor, Contract H-3 - Cuyahoga County, OH.**

Project Manager/Field Geologist/Technician: This project involved the installation and monitoring of a series of stationary points set into the shale walls of the future interceptor tunnel 230 feet underground. These stationary points were installed over a period of months in conjunction with new tunnel excavation and were monitored using precision measuring instruments including tape extensometers and depth micrometers. This type of work was needed to ensure the safety of the workers in the tunnel by assuring that the shale walls of the tunnel were not failing.

**Mancini-Shah Associates, Inc.: NEORS D EMSC Building Distress - Cuyahoga Heights, Oh.**

Project Manager/Field Geologist/Structural Technician: The existing NEORS D building is undergoing monitoring to detect any lateral or vertical movement throughout. Crack monitors, suspension monitors, and ceiling-to-floor monitors were installed and are monitored on a periodic basis to detect any such movement. These monitors were installed to delineate an existing structural problem in order to find a cause which will be corrected through modifications in the structure itself.

**Richland Engineering: Miles Road Soil Movement Project - Cuyahoga County, OH.**

Field Geologist/Laboratory Technician: Soil movement developed in several sections of roadway embankment along Miles Road. This project provided a suitable method to reconstruct those areas. Based on subsurface investigation findings, analysis of existing roadway embankment stability with the aids of computer program "STABL5". The data for this program was accumulated from inclinometers which were installed at the beginning of the project and monitored over a multi-year period.

#### TRAINING

- HAZWOPER Health and Safety Training per OSHA 29 CFR 1910.120 (40-hour course)
- HAZWOPER Health and Safety Refresher Training per OSHA 29 CFR 1910.120 (8-hour course, annually)
- Red Cross CPR and Health & Safety Training

#### AFFILIATIONS

- Association of Engineering Geologists (AEG)

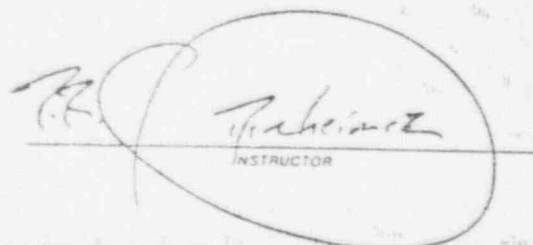
#### REGISTRATIONS/CERTIFICATIONS

- Radiation Safety Officer/Nuclear Density Meter Certified
- Certified Level 1 Asphalt Technician (ODOT)

20246

# Certificate Of Completion

This is to certify that Stephen E. Mileski has completed the  
basic training course on *Radiation Safety and Use of Nuclear Gauges*,  
held this 23rd day of September 19 92, held in the  
City of Akron State of Ohio by CPN Company.

  
INSTRUCTOR

  
CPN  
COMPANY  
2830 Howe Road  
Martinez, California USA 94553

  
RADIATION SAFETY OFFICER

## **APPENDIX B**

5. Based on the purchase agreement dated October 10, 1996, Prime Engineering, Inc. agreed to purchase all of the assets of the Geotechnical Division of R & R International, Inc. Akron, Ohio Office. There was no transfer of R & R International stock to Prime Engineering, Inc. Also R & R International, Inc. retained the regulated materials license and the licensed materials.

## APPENDIX C



## STORAGE LOCATION

Prime Engineering, Inc.

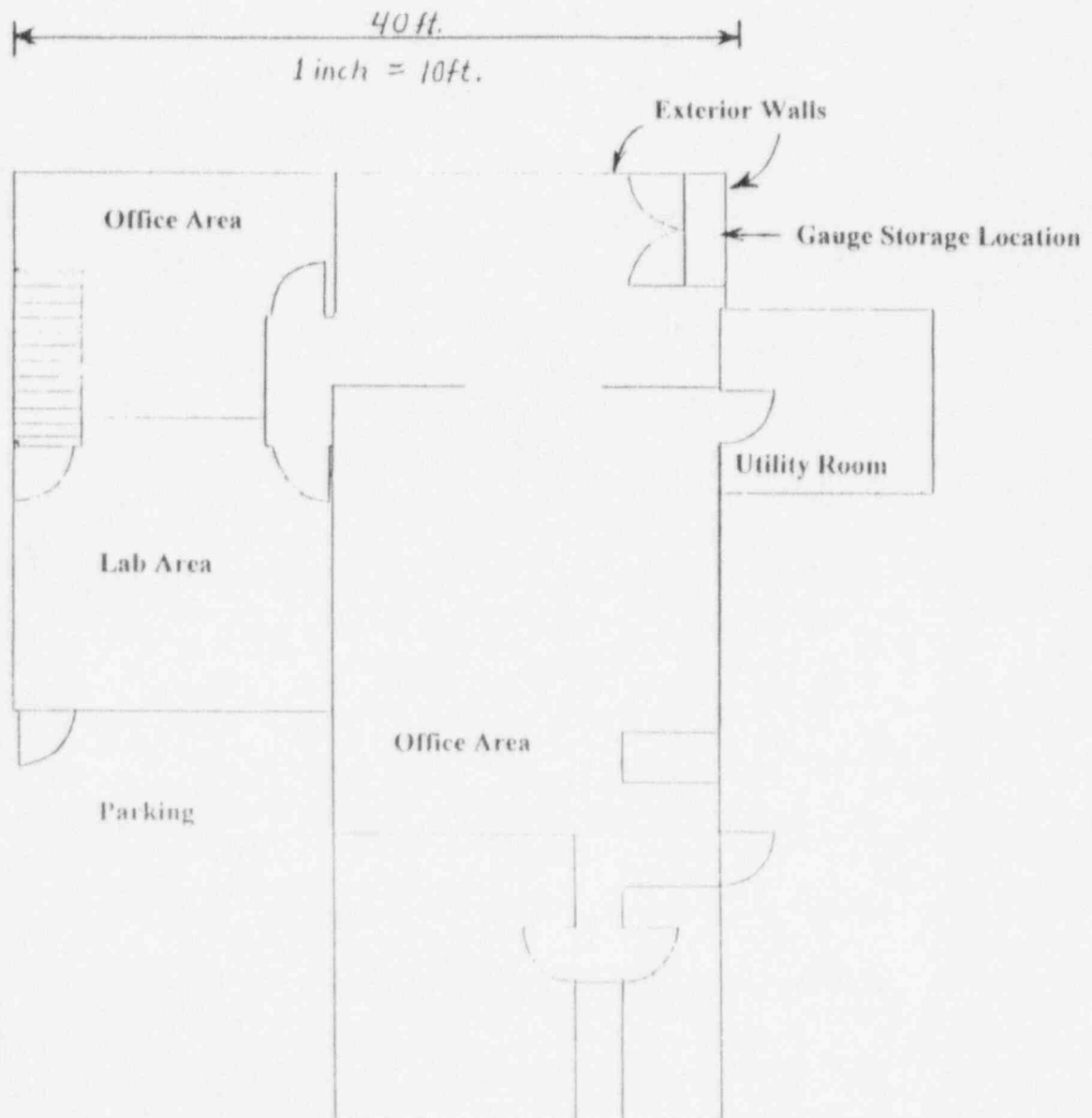
1038 Ghent Road

Akron, OH 44333

Gauges will be stored in their locked cases inside of a locked and posted cabinet. Storage cabinet will be 10 ft. from any people work stations. Maximum storage, ten (10) gauges.

Notice to Employees, Utilization Log, and location of License and Regulations posted.

The storage area is not in a residential zone.





## **RADIATION SAFETY PROGRAM**

### **General**

This Radiation Safety Program covers the procedures for the safe and proper use and possession of radioactive materials as contained in portable moisture/density gauges used to measure soil and other materials used in construction. When handled in accordance with this plan, the radioactive materials present no hazard to the licensee's employees, customers, or the general public.

### **Radiation Safety Officer**

All use and possession is under the direction and supervision of the Radiation Safety Officer (RSO). The RSO is a single point of accountability and responsibility between the Regulatory Agency and the Licensee. The RSO is responsible for all aspects of the Radiation Safety Program, including the following duties:

1. To ensure that all terms and conditions of the license are being complied with and that the information contained is up-to-date and accurate.
2. To ensure the equipment is leak tested at the required intervals.
3. To ensure that the equipment is only used by the operators authorized by the RSO, and that they use the equipment in accordance with all relevant regulations. This will include wearing of a suitable personal monitoring device.
4. To maintain records as required by the license and the regulations.
5. To ensure that all the equipment is properly secured against unauthorized removal at all times.
6. To serve as a point of contact and give assistance in the case of an emergency such as equipment damage in the field, theft, or fire and to notify the proper authorities in case of emergency.
7. To ensure that all operators have read and understand this Radiation Safety Program.
8. To arrange appropriate training for all operators.
9. To provide annual refresher training to all gauge operators on operating and emergency procedures, transportation requirements, changes in applicable regulations or license conditions, and correction of deficiencies identified by the RSO.
10. To post all required signs and notices at gauge storage location.

Post - document RH-2364, Notice to Employees.

Label - storage cabinet with "Caution, Radioactive Material" and international symbol.

Post - notice of where a copy of the organization's license, safety program, and copy of regulations are located.

### **Operation**

1. The operator will exercise suitable control over the gauge at all times. At no time is it to be left unattended or in the possession of an unauthorized person.
2. When not being used for field measurements, the gauge will be locked and returned to its storage/transportation case.
3. When testing is complete, the gauge will be returned to its permanent storage place as soon as possible.
4. When using the equipment, the operator will wear the personal monitoring device assigned. When the operator is not using the equipment, the monitoring device will be kept in a radiation-free, low-heat area.
5. At all times operators will observe ALARA (As Low As Reasonably Achievable) principles to minimize any dose received.
6. While the equipment is in the operator's possession, the operator will have a:





- Copy of the license
- Copy of this Radiation Safety Program with Emergency Procedures and Telephone Call - Down List
- Copy of Letter/Card of Authorization from RSO
- Copy of the Gauge Operation Manual, and
- Copy of the Current Leak Test Certificate

### Transportation

1. During transportation, the equipment shall be fully secured in the transporting vehicle and located away from personnel. When transported in a closed vehicle (car or van), the case will be locked and the vehicle will be locked when the operator is not with the vehicle. When transported in an open bed vehicle (pick-up truck), the case will be locked and the case securely fastened and locked to the truck bed when the operator is not with the vehicle.
2. The equipment will only be transported in an approved DOT shipping container with all the required labels and markings.
3. During transportation the operator will have Shipping Papers on the seat adjacent to the driver or in a holder which is mounted to the inside of the door on the drivers side of the vehicle describing the radioactive material with the proper nomenclature. A sample Shipping Paper is attached.
4. When an open bed vehicle is parked overnight at a hotel or motel, the operator shall cover the case in the secured transport position or lock the case in the cab of the vehicle.
5. When shipping by common carrier, the package shall be in compliance with 49 CFR 170-179.

### Maintenance

1. Periodic maintenance will include cleaning of the gauge. The operator will have received proper instruction on how to clean the gauge and will wear his assigned motoring device.
2. No maintenance will be performed in which the radioactive source is removed from the gauge. The gauge will be returned to the manufacturer or approved service center for this type of service.
3. A leak test will be performed annually (or at the interval specified in the license) using an approved leak test kit provided by CPN, and in accordance with the gauge manufacturer's instructions. The operator will have received proper instruction on how to leak test the gauge and will wear his assigned monitor device.

### Inventory

An inventory will be performed every six months in conjunction with leak testing. This inventory is to account for all sealed sources and devices received and possessed under our license.

### Annual Audit

Prime Engineering, Inc. will conduct an annual audit to fulfill the requirements of 10 CFR 20.1101 in accordance with Appendix I of the US NRC Draft Regulatory Guide DG-0008.

### Monitoring

Prime Engineering, Inc. will provide TLD monitoring equipment to all gauge users. TLDs will be provided by Landauer, Inc. of Glenwood, Illinois or other NVLAP accredited supplier. Landauer, Inc. is a NVLAP certified supplier, NVLAP Lab Code: 100518-0. TLDs will be exchanged on a 3 month schedule.



### Radiation Detection Instruments

Prime Engineering, Inc. has access to an appropriate survey meter for timely evaluation of source integrity following an incident at any job site, which conforms to section 10.2 of the Draft Regulatory Guide DG-0008. Cline's Technical Service, 10883 Cincinnati-Zanesville Road, Amanda, Ohio (CTS-34-26271-01) will provide instruments for timely evaluation of any situation.

### Records

Records will consist of:

Radioactive Material License

Personal Dosimeter Reports

Leak Test Certificates

Training Certificates

Gauge Inventory

Check-out/Check-in Log

A check-out log will be attached to the storage cabinet. Information on the log will include serial number of gauge, operator checking out gauge, date checked out, destination, estimated return date, and actual return date.

### Training

All operators will complete a manufacturer's Operator's Training Course. Operators will be given special training as required for their individual work assignments.

## EMERGENCY PROCEDURES

### Physical Damage

1. If any moving equipment is involved, stop its movement until the extent of contamination, if any, can be established.
2. Cordon off the area around the incident. An area with a radius of fifteen (15) feet will be sufficient.
3. Visually inspect the gauge to determine the extent of the damage to the source(s), source housing(s), and shielding. If the source, source housing, and shielding are intact and functional, the gauge can be removed from the site, returned to the shipping container, and shipped to the manufacturer for repair or replacement.



4. If the integrity or location of the source(s) cannot be positively identified, at the earliest possible time, when the situation is under control, contact the RSO. Describe the conditions and follow the instructions of the RSO. The RSO will immediately notify the appropriate regulatory agency.
5. The RSO shall follow the instructions of the regulatory agency.
6. If the source rod is bent and extended, or the shielding is damaged such that dose rates are likely to exceed those of an undamaged gauge, call the manufacturer for instructions before shipment.

### **Lodged or Lost Down-Hole Probe**

1. **Operating procedure to prevent a probe from becoming stuck or lost in a bore-hole:**
  - a. All access holes for probes shall be lined with a continuous casing from the lowest depth to a minimum of six inches above the surface.
  - b. The cable connectors to both the probe and surface electronics shall be checked daily to assure they are tight.
  - c. For all access hole sites greater than twelve (12) feet in depth, a dummy probe, whose stiffness, outside diameter and effective length are equal to the active probe, will be lowered to the bottom of the hole before deploying the radioactive source(s).
2. **Emergency procedures if a probe becomes stuck in a bore-hole.**
  - a. Immediately secure the area around the hole.
  - b. Notify the licensing authority immediately by telephone of the circumstances that resulted in the inability to retrieve the source.
  - c. Follow the instructions of the licensing authority.

### **Theft or Loss**

1. Immediately notify the RSO. The RSO will immediately notify the appropriate regulatory agency and the police.

### **Fire**

1. Call the Fire Department.
2. Take action appropriate with a fire to protect personnel.
3. Notify the RSO.
4. Stand by to advise the fire fighters as to the nature, locations, and potential hazards of the radioactive materials. Supply them with information packet consisting of the facility layout and a data sheet of the equipment including a photograph. Be sure to include any other important information; e.g. explosives, guard dogs, etc.



### Fire (cont.)

Melting Points:

	<u>F</u>	<u>C</u>
Stainless Steel	2550	1400
Carbide	2000	1090
Aluminum	1005	540
Lead	620	327
Polyethylene	257	125

Temperatures in an industrial fire will normally range from 500 F at floor level to a high at the ceiling of 1400 to 1800 F. The polyethylene and lead would melt in most fires, the aluminum only in severe fires. The Stainless steel capsule would not reach its melting point.

### Disposal/Decommissioning

1. Disposal will only be performed by transferring to a properly licensed organization.
2. The regulatory agency will be notified 30 or more days in advance of any relocation of the storage area. Formal decommissioning will not be required, provided leak tests are current.

### Statement of Commitment

This radiation safety program will be implemented at all times. A copy of these procedures shall be maintained in the licensee's radioactive license file, and another copy in the shipping case of the nuclear gauge at all times.

SIGNED Angela Sue DATE 11/15/96

## APPENDIX D

12/18

# Pacific Nuclear Technology Co.

2545 W 10th St Ste N

Antioch CA, 94509

(510) 706-8300

(510) 706-8396 FAX

## REPORT OF LEAK TEST

CUSTOMER: R&R INTERNATIONAL  
1234 S CLEV MASS RD PO BOX 4383  
AKRON, OH 44321  
P. DAVID GURA

MODEL NO: CPN M340301920

SERIAL NO: M340301920

ISOTOPE: Cs-137 10 mCi  
Am-241 50 mCi

DATE OF TEST: 11/25/1996

The sample identified above was submitted for leak test analysis.

DATE OF ANALYSIS: 12/07/1996 ANALYSIS NUMBER: 17126

RESULTS: BACKGROUND COUNT: 269 cpm  
GROSS COUNT: 259 cpm

REMOVABLE  
CONTAMINATION: NIL microcurie

NOTE: The US Nuclear Regulatory Commission and the Agreement States require that the analysis of the wipe from a sealed source must be capable of detecting the presence of 0.005 microcurie (185 Bq) on the sample. The count on the wipe was below a Lower Limit of Detection of 0.0001 microcurie. The source is not considered leaking. This report should be retained three years for viewing by regulatory agencies.

SIGNED 

Office of Radiation Safety  
Calif RM Lic No 5634-07

# Pacific Nuclear Technology Co.

2545 W 10th St Ste N

Antioch CA, 94509

(510) 706-8300

(510) 706-8396 FAX

## REPORT OF LEAK TEST

CUSTOMER: R&R INTERNATIONAL  
1234 S CLEV MASS RD PO BOX 4383  
AKRON, OH 44321  
P. DAVID GURA

MODEL NO: CPN MC3

SERIAL NO: M340702148

ISOTOPE: Cs-137 10 mCi  
Am-241 50 mCi

DATE OF TEST: 11/25/1996

The sample identified above was submitted for leak test analysis.

DATE OF ANALYSIS: 12/07/1996 ANALYSIS NUMBER: 17127

RESULTS: BACKGROUND COUNT: 269 cpm  
GROSS COUNT: 270 cpm

REMOVABLE  
CONTAMINATION: NIL microcurie

NOTE: The US Nuclear Regulatory Commission and the Agreement States require that the analysis of the wipe from a sealed source must be capable of detecting the presence of 0.005 microcurie (185 Bq) on the sample. The count on the wipe was below a Lower Limit of Detection of 0.0001 microcurie. The source is not considered leaking. This report should be retained three years for viewing by regulatory agencies.

SIGNED



Office of Radiation Safety  
Calif RM Lic No 5634-07



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12/11/96

# Pacific Nuclear Technology Co.

2545 W 10th St Ste N

Antioch CA, 94509

(510) 706-8300

(510) 706-8396 FAX

## REPORT OF LEAK TEST

CUSTOMER: R&R INTERNATIONAL  
1234 S CLEV MASS RD PO BOX 4383  
AKRON, OH 44321  
P. DAVID GURA

MODEL NO: CPN MC3

SERIAL NO: M320801013

ISOTOPE: Cs-137 10 mCi  
Am-241 50 mCi

DATE OF TEST: 10/11/1996

The sample identified above was submitted for leak test analysis.

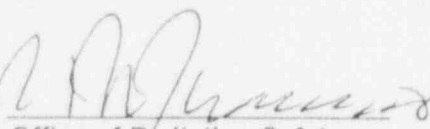
DATE OF ANALYSIS: 11/30/1996 ANALYSIS NUMBER: 17046

RESULTS: BACKGROUND COUNT: 277 cpm  
GROSS COUNT: 272 cpm

REMOVABLE  
CONTAMINATION: NIL microcurie

NOTE: The US Nuclear Regulatory Commission and the Agreement States require that the analysis of the wipe from a sealed source must be capable of detecting the presence of 0.005 microcurie (185 Bq) on the sample. The count on the wipe was below a Lower Limit of Detection of 0.0001 microcurie. The source is not considered leaking. This report should be retained three years for viewing by regulatory agencies.

SIGNED

  
Office of Radiation Safety  
Calif RM Lic No 5634-07

# Pacific Nuclear Technology Co.

2545 W 10th St Ste N  
Antioch CA, 94509  
(510) 706-8300  
(510) 706-8396 FAX

## REPORT OF LEAK TEST

CUSTOMER: R&R INTERNATIONAL  
1234 S CLEV MASS RD PO BOX 4383  
AKRON, OH 44321  
P. DAVID GURA

MODEL NO: CPN MC3

SERIAL NO: M320100649

ISOTOPE: Cs-137 10 mCi  
Am-241 50 mCi

DATE OF TEST: 11/25/1996

The sample identified above was submitted for leak test analysis.

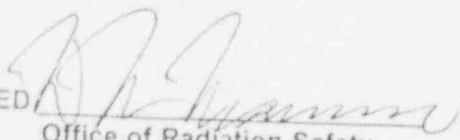
DATE OF ANALYSIS: 12/07/1996 ANALYSIS NUMBER: 17125

RESULTS: BACKGROUND COUNT: 269 cpm  
GROSS COUNT: 269 cpm

REMOVABLE  
CONTAMINATION: NIL microcurie

NOTE: The US Nuclear Regulatory Commission and the Agreement States require that the analysis of the wipe from a sealed source must be capable of detecting the presence of 0.005 microcurie (185 Bq) on the sample. The count on the wipe was below a Lower Limit of Detection of 0.0001 microcurie. The source is not considered leaking. This report should be retained three years for viewing by regulatory agencies.

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Office of Radiation Safety  
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## Source Device Inventory

Permanent Storage Location	Unit/ Model No.	Serial Number(s)	Sources (Amount)						
			Am 241/Be (50 mCi)	Cs-137 (10 mCi)	Ra-226 (45 mCi)	H-3	Co-57 (10 mCi)	Last Leak Test	Results
Akron	1) CPN MC-3	M340301920	X	X				4/9/95	Acceptable
	2) CPN MC-3	M320100649	X	X				4/9/96	Acceptable
	3) CPN MC-3	M340702148	X	X				4/9/96	Acceptable
	4) CPN MC-3	M320801013	X	X				4/9/96	Acceptable

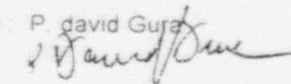
RSO Stephen E. Mileski

Date 01/09/97

## Source Device Inventory

Permanent Storage Location	Unit/ Model No.	Serial Number(s)	Sources (Amount)						
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Akron	1) CPN MC-3	M340301920	X	X				4/9/96	Acceptable
	2) CPN MC-3	M320100649	X	X				4/9/96	Acceptable
	3) CPN MC-3	M340702148	X	X				4/9/96	Acceptable
	4) CPN MC-3	M320801013	X	X				4/9/96	Acceptable
	5) Seaman C-200	A-704			X			Pending	
	6) Seaman C-200	A-744			X			Pending	
	7) Seaman C-200	A-970			X			4/9/96	Acceptable
	8) Sentex 50319	N/A				X		N/A	N/A
	9) Troxler 3411-B	7596	X	X				6-28-96	Acceptable
	10) Troxler 3440	13858	X	X				Pending	
Aberdeen	11) Troxler 3440	22722	X	X				Pending	
	12) Warrington XRF Microlead	608.4					X	3/13/96	Acceptable

RSO: P. David Gurd



Date: 09/20/96