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ED-20-12

March 6, 2020

Licensing Assistant Section
Nuclear Materials Licensing Branch
US Nuclear Regulatory Commission Region 1
2100 Renaissance Boulevard, Suite 100
King of Prussia, PA 19406-2713

RE: NRC Disposal Form 314; Amendment No. 3

To: NRC Licensing Assistant Section.

This letter is in regards to the Radioactive Materials License 07-13441-03 of The Performance Materials NA Inc, located at the DuPont Experimental Station in Wilmington, Delaware. For Amendment No. 3, please see the following: **Appendix 1** - NRC Form 314; Certificate of Disposition of Materials, **Appendix 2** - Radioactive Transfer Record and Receipt, **Appendix 3** - Leak Test Record.

I am requesting the removal of one (1) Cs-137 source; decreasing the total number of sources on License 07-13441-03 to three (3) Cs-137 sources. More specifically, the source identified on the disposal form is Serial Number 3355. The new site inventory can be found in **Table #1**.

Table #1 - Sealed Source Inventory for License 07-13441-03; Amendment No. 3

Source	Manufacturer	Chemical and/or Physical Form	Max. amount	Serial Number	Status
Cesium-137	Ronan Engineering	Sealed Source	50 mCi	3355	Removed on Amend. No. 3
Cesium-137	Ronan Engineering	Sealed Source	750 mCi	2554CN	On License
Cesium-137	VEGA	Sealed Source	2 mCi	97215B	On License



NMSS/RGN1 MATERIALS-002

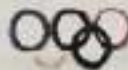
200 Powder Mill Rd
Wilmington, DE 19803

DOW RESTRICTED

618346



Attachment # 1 - NRC Form 314; Certificate of Disposition of Materials



WORLDWIDE PARTNER

200 Powder Mill Rd
Wilmington, DE 19803

DOW RESTRICTED



Attachment # 2 – Radioactive Transfer Record and Receipt



**200 Powder Mill Rd
Wilmington, DE 19803**

DOW RESTRICTED



Attachment # 3 – Leak Test Record



WORLDWIDE PARTNER

200 Powder Mill Rd
Wilmington, DE 19803

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Cesium-137	VEGA	Sealed Source	2 mCi	97214B	On License
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Thank you for your assistance with this matter. If you have any questions, contact information is provided in the signatures below.

Sincerely,

Grace E. Battista
Radiation Safety Officer
Performance Materials NA Inc
The Dow Chemical Company
(610) 244-6418
GBattista1@dow.com

Curvel Hypolite
R&D Site Leader
Performance Materials NA Inc
The Dow Chemical Company
(302) 695-6450
CHypolite@dow.com



WORLDWIDE PARTNER

200 Powder Mill Rd
Wilmington, DE 19803

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U.S. NUCLEAR REGULATORY COMMISSION

APPROVED BY OMB NO. 3145-0033

EXPIRES: 03/31/2024

CERTIFICATE OF DISPOSITION OF MATERIALS

Licensee must be registered in NRC's licensee information system (LIS). This certificate is valid for the period of the license. It is the licensee's responsibility to ensure that the information in this certificate is accurate and up-to-date. The licensee must provide a copy of this certificate to the NRC and to the State of Delaware. The licensee must also provide a copy of this certificate to the NRC and to the State of Delaware. The licensee must also provide a copy of this certificate to the NRC and to the State of Delaware.

LICENSEE NAME AND ADDRESS

Performance Materials NA Inc.
DuPont Experimental Station
200 Powder Mill Rd.
Wilmington, DE 19803

LICENSE NUMBER

07-13441-03

DOCKET NUMBER

030-39134

LICENSE EXPIRATION DATE

March 31, 2024

- A. LICENSE STATUS (Check the appropriate box)**
- ☐ This license has expired ☐ This license has not yet expired; please terminate it.

B. DISPOSAL OF RADIOACTIVE MATERIAL

(Check the appropriate boxes and complete as necessary. If additional space is needed, provide attachments)

The licensee, or any individual executing this certificate on behalf of the licensee, certifies that:

- ☐ 1. No radioactive materials have ever been procured or possessed by the licensee under this license
- ☐ 2. All activities authorized by this license have ceased, and all radioactive materials procured and/or possessed by the licensee under this license number cited above have been disposed of in the following manner:
- ☐ a. Transfer of radioactive materials to the licensee listed below:

- ☒ b. Disposal of radioactive materials
- ☐ 1. Directly by the licensee

- ☐ 2. By licensed disposal site

- ☒ 3. By waste contractor
- Applied Health Physics
2986 Industrial Blvd. Bethel Park, PA 15102

- ☐ c. All radioactive materials have been removed such that any remaining residual radioactivity is within the limits of 10 CFR Part 20, Subpart E, and is ALARA.

C. SURVEYS PERFORMED AND REPORTED

- ☐ 1. A radiation survey was conducted by the licensee. The survey confirms:
- ☐ a. the absence of licensed radioactive materials
- ☐ b. that any remaining residual radioactivity is within the limits of 10 CFR 20, Subpart E, and is ALARA.
- ☐ 2. A copy of the radiation survey results:
- ☐ a. is attached, or ☐ b. is not attached (Provide explanation); or ☐ c. was forwarded to NRC on: _____ Date _____
- ☒ 3. A radiation survey is not required as only sealed sources were ever possessed under this license, and
- ☒ a. The results of the latest leak test are attached, and/or ☒ b. No leaking sources have ever been identified

The person to be contacted regarding the information provided on this form:

NAME	TITLE	TELEPHONE (include Area Code)	E-MAIL ADDRESS
Grace E. Battista	Radiation Safety Officer	610-244-6418	gbattista1@down.com

Send all future correspondence regarding this license to:

C. CERTIFYING OFFICIAL

I CERTIFY UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT

PRINTED NAME AND TITLE

Grace E. Battista

SIGNATURE

Grace E. Battista

DATE

3/6/2020

WARNING: FALSE STATEMENTS IN THIS CERTIFICATE MAY BE SUBJECT TO CIVIL AND/OR CRIMINAL PENALTIES. NRC REGULATIONS REQUIRE THAT SUBMISSIONS TO THE NRC BE COMPLETE AND ACCURATE IN ALL MATERIAL RESPECT. 18 U.S.C. SECTION 1001 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.

Applied Health Physics, LLC

2986 Industrial Blvd., Bethel Park, Pa 15102 Phone: (412) 835-9555 Fax: (412) 835-9559
E-Mail address: knoble.ahp@comcast.net • Web Page address: WWW.APPLIEDHEALTHPHYSICS.COM

Mark V Leak Test Certificate

This certificate shall not be reproduced except in full, without written approval of Applied Health Physics, LLC.

Device Information

Device Serial Number:	3355	Source Serial Number:	3355
Device Manufacturer:	Ronan	Source Manufacturer:	Ronan
Device Model:	GS-200	Source Model:	GS-200
Device Type:	Gauge	Make:	
Radioisotope:	Cs-137	Location:	200 Powder Mill Road
		Activity:	50 mCi

Leak Test Information

Leak Test Performed by:	Keith Mobley	Leak Test Performed on:	8/21/2019
Leak Test Specimen Number:	82119-1	Leak Test Analysis Date:	8/21/2019
Leak Test Analysis Performed by:	L. McAllister		
Leak Test Results Indicate an Activity of:	< 0.005 uCi		

Notification

Analysis of this leak test sample was provided by Applied Health Physics, LLC. Pennsylvania Department of Environmental Protection License Number PA-0228A. In the event this specimen indicates leakage and or contamination in excess of 0.005 microcuries, Applied Health Physics, LLC will notify you promptly by telephone; at such time you will need to take the appropriate actions required by the governing regulatory agency. Applied Health Physics, LLC utilizes the following for leak test (wet-swab) analysis: Model: MARK V Leak Test Kit. Applied Health Physics, LLC utilizes the following instruments for all MARK V Leak Test analysis: Protean Instruments - ASC-950 ; Perkin Elmer - Tri-Carb 2800TR ; Ludlum Measurements - 2200 and Ludlum Measurements - 2929.

Client Information

Dow Chemical Co. De.	Contact	Timothy Kalbach
200 Powder Mill Road	Phone:	(610) 360-5409
	Contact:	tjkalbach@dow.com
	Phone:	

Wilmington DE 19803

This certificate is an essential record and should be maintained for review by a regulatory agency

Leak Test Due Dates are based upon Leak Test Analysis Date

Next LT Due 2/21/2020