

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 1, Parts 30, 31, 32, 33, 34, 35, 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.

Licensee

1. Infinity Analytical Services, LLC

2. P.O. Box 1100
Highway 64, Carlile Lane
Gore, Oklahoma 74435-1100

In accordance with letter dated
July 18, 1996

3. License number 35-12636-03 is amended in
its entirety to read as follows:

4. Expiration date February 28, 2006

5. Docket or
Reference No 030-05948

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. Any byproduct material
with Atomic Nos. 3-83

A. Any, except plated
or sealed sources

A. Not to exceed 500
microcuries per
radionuclide and 10
millicuries total

B. Any byproduct, source,
or special nuclear
material with Atomic
Nos. 84-96

B. Any, except plated
or sealed sources

B. Not to exceed 500
microcuries per
radionuclide and 10
millicuries total

C. Any byproduct material
with Atomic Nos. 3-83

C. Plated or sealed
sources

C. Not to exceed 500
microcuries per
radionuclide and 10
millicuries total

D. Any byproduct, source,
or special nuclear
material with Atomic
Nos. 84-96, except
Atomic Nos. 86, 88, and
90

D. Plated or sealed
sources

D. Not to exceed 500
microcuries per
radionuclide and 10
millicuries total

E. Any byproduct material
as defined in 10 CFR
40.4

E. Uranium mill
tailings or waste

E. 68 kilograms

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OFFICIAL RECORD COPY

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**MATERIALS LICENSE
SUPPLEMENTARY SHEET**

License Number

35-12636-03

Docket or Reference Number

030-05948

Amendment No. 23

9. Authorized use

A. through E. For storage only.

CONDITIONS

10. Licensed material shall be stored only at the Infinity Analytical Services Laboratory, 3½ miles southeast off U.S. Highway 64 at Carlile Lane, Gore, Oklahoma.
11. A. Licensed material shall be stored under the supervision of the Radiation Safety Officer.
- B. The Radiation Safety Officer for this license is Rick Redle.
12. A. Sealed sources shall be tested for leakage and/or contamination at intervals not to exceed 1 year or at such other intervals as specified by the certificate of registration referred to in 10 CFR 32.210.
- B. Notwithstanding Paragraph A of this Condition, sealed sources designed to emit alpha particles shall be tested for leakage and/or contamination at intervals not to exceed 1 year.
- C. In the absence of a certificate from a transferor indicating that a leak test has been made within 1 year prior to the transfer, a sealed source received from another person shall not be put into use until tested.
- D. Sealed sources need not be leak tested if:
- (i) they contain only hydrogen-3; or
 - (ii) they contain only a radioactive gas; or
 - (iii) the half-life of the isotope is 30 days or less; or
 - (iv) they contain not more than 100 microcuries of beta and/or gamma emitting material or not more than 10 microcuries of alpha emitting material; or
 - (v) they are not designed to emit alpha particles, are in storage, and are not being used. However, when they are removed from storage for use or transferred to another person, and have not been tested within the required leak test interval, they shall be tested before use or transfer. No sealed source shall be stored for a period of more than 10 years without being tested for leakage and/or contamination.

**MATERIALS LICENSE
SUPPLEMENTARY SHEET**

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Amendment No. 23

- E. The leak test shall be capable of detecting the presence of 0.005 microcurie of radioactive material on the test sample. If the test reveals the presence of 0.005 microcurie or more of removable contamination, a report shall be filed with the U.S. Nuclear Regulatory Commission in accordance with 10 CFR 30.50(b)(2), and the source shall be removed immediately from service and decontaminated, repaired, or disposed of in accordance with Commission regulations. The report shall be filed within 5 days of the date the leak test result is known with the U.S. Nuclear Regulatory Commission, Region IV, 611 Ryan Plaza Drive, Suite 400, Arlington, Texas 76011, ATTN: Director, Division of Radiation Safety and Safeguards. The report shall specify the source involved, the test results, and corrective action taken.
- F. Tests for leakage and/or contamination shall be performed by the licensee or by other persons specifically licensed by the Commission or an Agreement State to Perform such services.
13. Sealed sources containing licensed material shall not be opened or sources removed from source holders by the licensee.
14. The licensee shall conduct a physical inventory every 12 months to account for all sources and/or devices received and possessed under the license.
15. In addition to the possession limits in Item 8, the licensee shall further restrict the possession of licensed material to quantities below the minimum limit specified in 10 CFR 30.35(d) or 10 CFR 40.36(b) for establishing decommissioning financial assurance.

**MATERIALS LICENSE
SUPPLEMENTARY SHEET**

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16. 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 U.S. 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 September 30, 1994
- B. Application and letters dated May 26, 1995
- C. Letter dated June 12, 1995
- D. Letter dated June 20, 1995
- E. Letter dated July 20, 1995
- F. Letter dated July 24, 1995
- G. Letter dated July 25, 1995
- H. Letter dated July 26, 1995
- I. Letter dated August 24, 1995
- J. Application dated December 8, 1995
- K. Letters dated February 6, 1996
- L. Letter dated July 18, 1996

FOR THE U.S. NUCLEAR REGULATORY COMMISSION

Date JUL 24 1996

Original Signed By
Jacqueline D. Burks

By _____
Nuclear Materials Licensing Branch
Region IV
Arlington, Texas 76011



UNITED STATES
NUCLEAR REGULATORY COMMISSION

REGION IV
611 RYAN PLAZA DRIVE, SUITE 400
ARLINGTON, TEXAS 76011-8064

July 24, 1996

Infinity Analytical Services, LLC
ATTN: Rick Redle, Vice President
Radiation Safety Officer
P.O. Box 1100
Highway 64, Carlile Lane
Gore, OK 74435-1100

SUBJECT: LICENSE AMENDMENT

Please find enclosed License No. 35-12636-03. You should review this license carefully and be sure that you understand all conditions. If you have any questions, you may contact the reviewer who signed your license at 817-860-8132.

NRC expects licensees to conduct their programs with meticulous attention to detail and a high standard of compliance. Because of the serious consequences to employees and the public which can result from failure to comply with NRC requirements, you must conduct your program involving radioactive 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: Inspection and Investigations," 10 CFR Part 20, "Standards for Protection Against Radiation," and other applicable regulations.
2. Possess radioactive material only in the quantity and form indicated in your license.
3. Use radioactive material only for the purpose(s) indicated in your license.
4. Notify NRC in writing of any change in mailing address (no fee required if the location of radioactive material remains the same).

5. Request and obtain written NRC consent before transferring your license or any right thereunder, either voluntarily or involuntarily, directly or indirectly, through transfer of control of your license to any person or entity. A transfer of control of your license includes not only a total change of ownership, but also a change in the controlling interest in your company whether it is a corporation, partnership, or other entity. In addition, appropriate license amendments must be requested and obtained for any other planned changes in your facility or program that are contrary to your license or contrary to representations made in your license application, as well as supplemental correspondence thereto, which are incorporated into your license. A license fee may be charged for the amendments if you are not in a fee-exempt category.
6. Maintain in a single document decommissioning records that have been certified for completeness and accuracy listing all the following items applicable to the license:
 - Onsite areas designated or formerly designated as restricted areas as defined in 10 CFR 20.3(a)(14) or 20.1003.
 - Onsite areas, other than restricted areas, where radioactive materials in quantities greater than amounts listed in Appendix C to 10 CFR 20.1001-20.2401 have been used, possessed, or stored.
 - Onsite areas, other than restricted areas, where spills or other unusual occurrences involving the spread of contamination in and around the facility, equipment, or site have occurred that required reporting pursuant to 10 CFR 30.50(b)(1) or (b)(4), including areas where subsequent cleanup procedures have removed the contamination.
 - Specific locations and radionuclide contents of previous and current burial areas within the site, excluding radioactive material with half-lives of 10 days or less, depleted uranium used only for shielding or as penetrators in unused munitions, or sealed sources authorized for use at temporary job sites.
 - Location and description of all contaminated equipment involved in licensed operations that is to remain onsite after license termination.
7. Submit a complete renewal application with proper fee, or termination request at least 30 days before the expiration date on your license. You will receive a reminder notice approximately 90 days before the expiration date. Possession of radioactive material after your license expires is a violation of NRC regulations.
8. Request termination of your license if you plan to permanently discontinue activities involving radioactive material.

You will be periodically inspected by 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; 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), 60 FR 34381, June 30, 1995.

Thank you for your cooperation.

Sincerely,

Original Signed By
Jacqueline D. Burks
Jacqueline D. Burks
Health Physicist
Nuclear Materials Licensing Branch

Docket: 030-05948
License: 35-12636-03
Control: 466150

Enclosures: As stated

JUL 4 1996

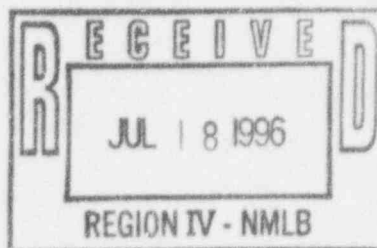
Infinity Analytical Services, LLC -4-

DOCUMENT NAME: P:\MLCOVER\LETTER\ASPOL.MLC

To receive a copy of this document, indicate in the box "C" - Copy without attachment/enclosure "E" - Copy with attachment/enclosure "N" - No Copy

RIV:NMLB	N						
JDBurks	<i>JDBurks</i>						
07/24/96							

OFFICIAL RECORD COPY



July 18, 1996

Ms. Jackie Burks
U. S. Nuclear Regulatory Commission
Region IV
611 Ryan Plaza Drive
Suite 400
Arlington, Texas 76001

(Sent via fax: 1-817/860-8265 and regular mail)

Re: Infinity Analytical Services, L. L. C. (Infinity)
Request for License Amendment
License No. 35-12636-03

Dear Ms. Burks:

Pursuant to our discussions this correspondence is issued to effect an amendment to our existing license to place such license in an active but possession only status.

In order to meet the requirement set forth for such status, we hereby affirm the following:

1. Infinity has ceased all licensed operations and will not utilize equipment containing source materials or use any source material for any purpose.
2. The source material containing equipment is located at Interstate 40 and Highway 10 in Gore, Oklahoma, in a facility commonly known as the Carslile School. This site is the approved site shown on the existing license. The site contains an alarm system which is monitored 24 hours per day and has access only by Infinity officers and Sequoyah Fuels RSO/President. No daily activities are being conducted at the site.
3. Rick R. Redle, as Vice President of Investment Resource Management, L.P., parent to Infinity until advised otherwise, is the designated responsible party for assuring that the terms of this amendment are adhered to and requirements of the license are complied with. It is our understanding that this party does not have to obtain or maintain any radiation safety certificates. It is also our intent to continue to call upon Sequoyah Fuels' personnel as may be warranted from time to time, to ensure ongoing compliance.

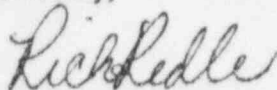
Ms. Jackie Burks
U. S. Nuclear Regulatory Commission
July 18, 1996
Page Two

4. Laboratory and testing facilities will remain inactive with no personnel or testing activity, analytical or otherwise, conducted at the site. Given no operational activity and the lock down of the facilities, we believe the premises to be secure as monitored by alarm security services.
5. With the ceasing of all operational activities and discharging of employees, current personal monitoring dosimetry service will be discontinued; training programs suspended, and instrument access restricted. Site visits by any person will have dosimetry service available to register any exposure to source materials.
6. Infinity shall provide such leak-test of all sealed sources on an annual basis or before any authorized transfer of sources to an authorized recipient.

It is our intention to maintain the license in an active but possession only status until further notice, recognizing that all fees required for same shall be paid timely upon notice of fee due.

Enclosed please find our Check No. NDB 0618 in the amount of \$300.00 for the processing of this amendment. Should you have any questions, please contact our offices at (214) 248-4745.

Sincerely,



Rick Redle
Vice President

RR/mcd

Enclosure(s)

c: R. G. Stader, IRM
Irfan Toor, Texilla Environmental, Inc.
File-mdfc:\infinity\nrc.wpd

INFORMATION NEEDED FOR POSSESSION ONLY LICENSE

1. A statement that the licensee has ceased licensed operations and a commitment not to use the material for any purpose.
2. A physical description of the facilities where the material will be stored, if it is different from storage facilities already approved in the license. Identify any facility changes that are planned after the material is placed in storage and provisions to maintain exposure to radiation as low as reasonably achievable (ALARA).
3. Identification of the individual who will be responsible for maintaining control of the stored material. Provide a resume of training and experience, if this information has not already been provided.
4. A description of the accountability program to be implemented by the licensee to ensure that the material remain in secure storage and is not used. The program should provide reasonable assurance that the licensee can maintain security and account for the material (inventory at least annually).
5. A description of planned changes to the licensee's radiation safety program as a result of placing the material in storage. These changes may include, but are not limited to, the following:
 - a. Dosimetry services
 - b. Worker Training programs
 - c. Instrument calibration services
6. A commitment to leak-test sealed sources, if applicable, at least once every 3 years and immediately before transfer to an authorized recipient.
7. A commitment to maintain the license in an active state. (Note that amendment fees will continue to apply).

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U.S. NUCLEAR REGULATORY COMMISSION
Region IV
611 Ryan Plaza Drive, Suite 400
Arlington, Texas 76011

DIVISION OF NUCLEAR MATERIALS SAFETY

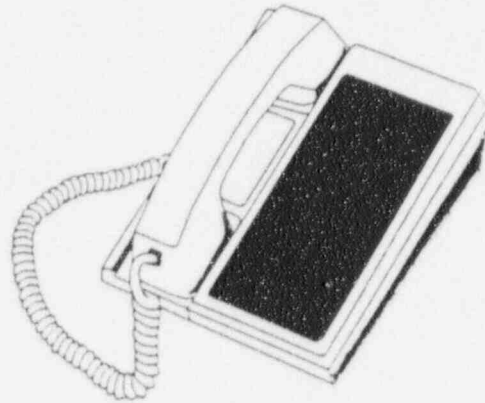
DATE/TIME: 7/17/96 12:45 pm

PRIORITY:

Immediately X

1 Hour

2-4 Hours



MESSAGE TO: Rich Ledle

MESSAGE FROM: Jackie Burks

NUMBER OF PAGES: 1 PLUS TRANSMITTAL SHEET

TELECOPY NUMBER: 214-931-2218 VERIFICATION NUMBER:

CONTACT:

SPECIAL INSTRUCTIONS/ATTACHMENTS:

Mr. Ledle:
Attached is a copy of the information you need to respond to in order
to amend your license. Please follow up with a hard copy in the mail,
including the amendment fee. We're anxiously awaiting your reply
so we can close out this action. If you have any questions, please
call me @ 817-820-8132.
A copy of information requested including copy of check to
Thank,
Jackie Burks

Transmitted and Verified by: 817-820-8263 **DISPOSITION:**

Return to Originator:

Place in Mail:

Other:

NAME

DATE

INFORMATION NEEDED FOR POSSESSION ONLY LICENSE

1. A statement that the licensee has ceased licensed operations and a commitment not to use the material for any purpose.
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 - a. Dosimetry services
 - b. Worker Training programs
 - c. Instrument calibration services
6. A commitment to leak-test sealed sources, if applicable, at least once every 3 years and immediately before transfer to an authorized recipient.
7. A commitment to maintain the license in an active state. (Note that amendment fees will continue to apply).

FILE COPY



July 9, 1996

Ms. Vivian H. Campbell
U. S. Nuclear Regulatory Commission
Nuclear Materials Licensing Branch
Region IV
Arlington, Texas 76001

(Sent via fax: 1-817/860-8263)

Ref: Infinity Analytical Services, L.L.C.

Dear Ms. Campbell:

My apologies for miscommunication of Mr. Toor's recent activities at our Gore site. As further clarification the regulatory aspects related to source materials were reviewed under the supervision of Sequoyah's RSO and not Mr. Toor. Mr. Toor's involvement was to assess the analytical capabilities and inspection of the site in conjunction with Mr. Tony Sequenzia for assurance of security purposes. I trust this explanation and clarification more fully represents the involvement of referenced individuals.

Should you have any questions, please feel free to contact our offices.

Sincerely,

Rick Redle
Vice President

RR/mcd

c: Ritchie G. Studer, IRM
Irfan A. Toor, Texilla Environmental, Inc.
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817-860-8263 **FILE COPY**

July 8, 1996

Mr. Rick Redle
Vice President
IRM - Infinity Analytical Services
4570 Westgrove Drive, Suite 240
Dallas, TX 75248

RE: INFINITY ANALYTICAL SERVICES, LLC; NRC LICENSE NO.
35-12636-03; YOUR LETTER TO MS. VIVIAN H. CAMPBELL
DATED JUNE 26, 1996.

Dear Rick,

Please be advised that I did not review any source materials which is in contradiction with your statement to Ms. Vivian Campbell of the NRC. I was merely there to inspect the Site and assess its analytical capabilities. While we did try to identify larger analytical instruments, no attempt was made to get a detailed inventory or identify individual nuclear sources. If you have any concern regarding that issue please have a qualified technician inspect and identify each individual source.

Please feel free to call me if there is any other issue you are not sure of.

Best Regards,
Texilla Environmental, Inc.

Irfan A. Toor, PhD, PE
President

/tei001

Enclosure: One

cc. R G Studer
Vivian Campbell

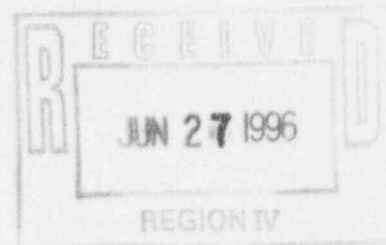
Texilla Environmental, Inc.

4570 Westgrove Drive, Suite 255, Dallas, TX 75248
Tel: 214-733-3378 Fax: 214-733-0366

FILE COPY



June 26, 1996



Ms. Vivian H. Campbell
United States Nuclear Regulatory Commission
Nuclear Materials Licensing Branch
Region IV
Arlington, Texas 76001

RE: License Number 35-12636-03
Infinity Analytical Services, LLC

Dear Ms. Campbell:

Pursuant to previous discussions, we advise that the laboratory testing facilities located in Gore, OK are secured with all access restricted. Samples having been manifested to the laboratory from Sequoyah Fuels have been collected and returned to Sequoyah for their safe keeping. All testing materials or Source materials are secure at site having been reviewed by Sequoyah Fuel's RSO and Mr. Irfan Toor.

We appreciate your continued cooperation during our restructuring and restaffing of the facilities.

Sincerely,

Rick Redle
Vice President.

rr/em

cc: R.G. Studer
I. Toor

FILE COPY

From: William Brown
To: JDB
Date: 6/20/96 3:50pm
Subject: Planned Purchase of Infinity Analytical Services, LLC

Jackie, according to a voice mail message received by your office, a Dr. Irfan Toor plans to acquire the subject lab perhaps as part of a joint venture arrangement. Such an acquisition would be an indirect license transfer under 10 CFR 30.34(b) requiring advance written consent of the NRC. This is so because such an acquisition of ownership would be a transfer of control. Before the staff can give its consent in writing, it must have full information sufficient enough for it to find that the transfer is in accordance with the provisions of the Atomic Energy Act of 1954, as amended. The kind of information that the staff needs is set forth in NRC Information Notice 89-25, Rev. 1. I suggest that Dr. Toor be sent a copy of the notice with a request that the information be furnished to the staff as a condition precedent to the planned license transfer. Please let me know if I can be of any assistance. Your file has been returned under separate cover. Bill

CC: DBS,VHC

FILE COPY

From: Robert Brown
To: rasl, ddc, clc, llh, dbs
Date: 6/14/96 10:51am
Subject: Infinity Analytical Services (IAS)

Mr. Rick Redle of Investment Resources Management (IRM), parent company of IAS, called Blair and I this morning (June 14, 1996). He related the following facts:

- He has personally verified onsite that the building is secure and the keys are in his possession.
- An employee of SFC will check the building each day.
- A new manager will arrive onsite either late Sunday or early Monday, he will bring a new RSO later in the week.
- An inventory of licensed material will be performed when the new manager arrives.
- The licensing staff will be contacted Tuesday morning to begin necessary amendments.
- No sample processing will be done until licensing issues are taken care of.
- Later today he is to fax us a letter confirming the above.

- Bankruptcy, now or in the near future (legal status of the company - Chapter 11 or Chapter 7)

6/18/96: Attempted to contact IAS but got answering machine at approximately 10:15am.

Spoke with Mr. Redle of IRM on 6/19/96 who stated the following:

- Dr. Irfan Toor will be the new manager
- No samples existing on site
- All radioactive material is locked up
- Should be back in operation in a couple of weeks
- New RSO should be coming on board - specify a date when the RSO will be on board
- Someone from SFC going over to Carlile School on a daily basis to make sure everything is okay
- Company is changing locks on doors

Spoke with Tony Sequenzia - facilities manager on 6/20/96 who stated the following:

- Dr. Irfan Toor is a contractor of ITEX; not employee; may be a joint venture; in voice mail message left on Vivian's phone, Dr. Toor indicated that he planned to acquire the lab; after speaking with Mr. Sequenzia, the licensee will still be Infinity Analytical Services; however, management services will be contracted out.
- There is a 24 hr. security guard at the Carlile School through SFC
- All radioactive material is locked up
- All samples were picked up by SFC
- Mr. Redle is the one to speak with concerning new RSO and a specific date of when the new RSO will be on board; Mr. Redle will not be in office until Monday
- Dr. Toor will call Vivian or Blair tomorrow (Friday 6/21/96)

Spoke with Dr. Irfan Toor on 6/24/96 who stated the following:
phone # 214-733-3378 (fax # 214-733-0366)

- The facility is secure and security is still monitoring it
- Finalizing plans this week as far as taking over the lab is concerned
- Will get Mr. Redle to fax us something by the end of this week concerning the status of transferring the lab, including RSO changes, if necessary; also, specific date on responding to the IN 89-25, Rev. 1 information

Spoke with Dr. Irfan Toor on 7/12/96 who stated the following:

- The acquisition of the laboratory is on hold until IRM comes up with better package
- Dr. Toor is still interested in the deal, but not attracted financially
- Until Dr. Toor contacts us personally, he is not involved in the management package

7/16/96: Blair and I met with Dwight to discuss what action to take as far as IAS/IRM is concerned; Dwight spoke with receptionist at IRM to inform her that Mr. Redle should contact him immediately regarding his NRC license; may be in violation of license because RSO currently named on the license is not at site.

7/17/96: Blair, Dwight, and I had a telephone conference call with Mr. Redle, Vice President of IRM. He has 2 options to choose from: 1) Possession Only License (POL) with someone identified as RSO (even himself) 2) Name new RSO to license. Mr. Redle thinks that option 1 is the best option. It is the intent of IRM to open the lab (IAS) under a different contract with British Petroleum - should know within 1-2 weeks; if not, lab will not open. For now, the SFC RSO will oversee lab. Option Mr. Redle had was to send the calibration sources back to manufacturer but Blair informed Mr. Redle that this option was not viable unless he wanted to terminate the license.

7/17/96 (Con't):

Don't give 30 day response time to respond to POL information -
ask Mr. Redle when he can get the response to us.

From: James Shepherd
To: LBB,DBS
Date: 6/12/96 1:16pm
Subject: FOLLOW ON TO INFINITY

I talked with Craig Harlin; SFC removed all their samples from the lab this morning in anticipation of lab closure (many of the employees are former SFC'ers), so there is very little radioactive material in the facility. SFC also has an interest in security of the Lab because there are outstanding payments on the transfer still due and the equipment is valuable.

CC: JDP1

FILE COPY

From: Judy Kilcrease
To: jdb
Date: 6/12/96 9:22am
Caller: Rochelle Batesole
Company: infinity
Phone: 918-489-2876

☒ [*] Telephoned
☐ [] Will call again
☐ [] Wants to see you
☐ [] Urgent

☒ [*] Please call
☐ [] Returned your call
☐ [] Came to see you

needs to talk to someone today.

Employees are leaving facility - claim they haven't been paid; Blair/Linda H./myself spoke with Mr. Rick Riddell, Executive Vice President of the parent company of Infinity who stated that he just got word of the problem. Will send someone up to Gore, Oklahoma to physically secure the area. Will call us back this afternoon to tell us what has happened and what they are going to do to rectify the situation. Linda suggested a reverse CAL (Bob Brown will assist me with this).

Get them to commit to keeping the facility secured, do an inventory of the facility, commitment that work will cease until license amended to include a qualified RSO.

Ms. Batesole is faxing us a copy of the letter sent to corporate office explaining status of the lab at "lock-down" on 6/12/96.

Received call at 11:27am from Ms. Batesole who left voice mail message stating that she is leaving the building; building will be locked and she won't have access to it anymore until corporate decides what it will do.

Ross made the decision to call State of Oklahoma DEQ - Chuck Cain will notify them.

Called Craig Harlin of SFC to confirm if the building is secured and locked as stated to us by Ms. Batesole.

Attempted to call Mr. Riddell; however, was on another phone call; supposed to call back to Ross's office.

Let Chuck know status of building being locked and secured.

If we need Blair, will be wearing pager tomorrow.

6/13/96: Mr. Craig Harlin of SFC called. Left voice mail message stating that he went by the Carlisle School (IAS facility) after work on yesterday to verify IAS lab doors were locked. Mr. Harlin stated that the place was locked up tight and as far as he can tell, everything is fine.



ANALYTICAL SERVICES LLC

FILE COPY

June 12, 1996

~~Rick Reynolds~~ Redel

Investment Resource Management (IRM)
4570 Westgrove Drive, Suite 240
Addison, TX 75248

RE: State of the Laboratory at Shut Down

Dear Mr. Reynolds:

The purpose of this letter is to describe the state of the laboratory at the time of its closure. This letter will cover the areas of the laboratory containing waste and recommendations to legally dispose of such waste and also the status of laboratory chemicals. It should be noted that IRM is the sole owner of the waste contained within the laboratory areas and the waste holding area and that failure to properly dispose of the waste will constitute illegal disposal of hazardous waste pursuant to Title 40 of the Code of Federal Regulations. Scott Logan, of Enviroserve Waste Services Inc., Tulsa, Oklahoma can dispose of the waste. Contact this company at (918) 587-9864.

I. Laboratory Hazardous Waste

A. Laboratory Waste. All laboratory waste will remain in the individual laboratories within their waste containers or sample containers, as appropriate.

B. Live and Spent Samples. Sequoyah Fuels Corporation will pick up all of their samples in the near future. These include samples with unfinished analysis and samples within the Radiological Spent Sample storage area.

C. Chemical and Radiological Standards. All standards of the organic, inorganic and wet chemical laboratories will remain within the appropriate laboratory storage areas of the applicable laboratory. All radiological standards will remain within the locked radiological standard storage cabinet located within radiological laboratory.

D. ITEX Radiological Samples (BP Chemical treatability study). These samples are being held in the Radiological Spent Sample storage area located within the Thorium laboratory.

E. Waste Storage Area. All waste within the Hazardous Waste Storage area are held within DOT approved containers, appropriately labeled, and appropriately sealed.

All hazardous waste within the physical laboratory and the waste storage area are held in accordance with regulations.

II. Laboratory Chemicals

All laboratory Chemicals are properly stored and labeled and thus do not constitute a "waste" under federal or state laws since these chemicals are usable for their intended purpose. The

INFINITY ANALYTICAL SERVICES, L.L.C. • (918) 489-2062 FAX (918) 489-2280
MAILING ADDRESS - PO BOX 1100 • GORE, OK 74435-1100
SHIPPING ADDRESS - HIGHWAY 64 & CARLILE LANE, VIAN, OK 74962

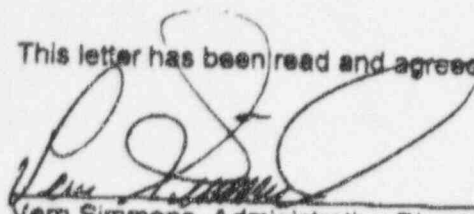
Being picked
up 6/12/96.

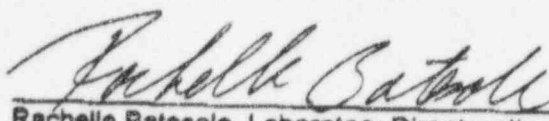
chemicals are either stored within the laboratory in which they would have been used, appropriate storage cabinets, or the preparatory trailer located outside of the laboratory building.

- III. It is imperative that the Nuclear Regulatory Commission and the Oklahoma Department of Environmental Quality are contacted and notified that operations at this facility have ceased and that all key personnel are no longer employed. We are required to notify these agencies due to By-Product License and State Certification requirements.
- IV. Closing Weekly Radiological Survey and Personnel Dosimetry Concerns. A surface survey of 40 discrete points within the laboratory and the external trailer was conducted on 6/3/96. Exposure rate, gross alpha and beta/gamma measurements were made at these 40 locations. No removable contamination measurements were made due to personnel limitations. A copy of this survey is attached to this letter. No locations in the survey were found to have a directly measured activity or exposure rate in excess or even approaching any of the action limits as stated in NRC byproduct license 35-12636-03. However this survey does not preclude the performance of a radiological survey as stated below in section VI. All applicable records regarding the performance of weekly surface and air surveys is located in the top drawer of the QA office file cabinet. In addition, the TLD badges for the monitoring period starting 4/1/96, and a few remaining from the previous period, need to be sent to Siemens for dosimetry analysis. If any dose for any of the personnel is detected, the personnel must be notified in writing if the dose is greater than 10% of the occupational limit as stated in 10CFR.
- V. Contractual Obligation to Survey Entire Facility.
Under the lease agreement with the Sequoyah School District, IRM is required to conduct a survey of the entire property and facility and certify that the property is inhabitable with no radiological or chemical hazards. The above mentioned "Closing Weekly Radiological Survey" does not meet this requirement as that survey is conducted as a matter of routine and is not as thorough as the survey being required upon abandonment of the premises.
- VI. Facility Instrumentation and Equipment
All facility instrumentation and equipment originally belonging to Sequoyah Fuels Corporation and IRM is present and accounted for at the time of the closure. This fact is witnessed by Rachelle Batesole and Monty Mooring. Acquisition of instrumentation and equipment from this date forward must be coordinated through IRM and/or Sequoyah Fuels Corporation, as appropriate.
- VII. Facility Keys
All facility keys have been sent to 4570 Westgrove Drive, Suite 240, Addison, Texas, 75248 by UPS 2nd Day Air. Facility keys were held by Vern Simmons, Rachelle Batesole, Timothy Stonick and Monty Mooring and turned in no later than June 12, 1996.

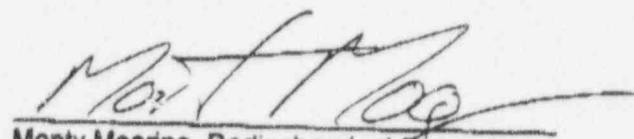
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This letter has been read and agreed to by:


Vern Simmons, Administrative Director


Rachelle Batesole, Laboratory Directorette


Tim M. Stonick, Radiation Safety Officer


Monty Mooring, Radiochemical Supervisor

DATE: 8/9/96

TIME: 10:00

LOCATION: Exit Lab

INSTRUMENT COUNTER USED

TYPE	SERIAL NO.	CAL. DATE
1	1000	10/1/95
2	1001	10/1/95
3	1002	10/1/95
4	1003	10/1/95

REASON, HWP NO., ROUTINE CODE:
Final Laboratory Exit Survey

REMARKS:
No swipes taken due to inoperability of gmp-flow counter.

CONTAMINATION SURVEY DATA

ALL RESULTS ARE ON 100% SENSITIVITY

NO.	AREA	RESULTS	NO. OF SWIPES	NO. OF COUNTS	NO. OF DISCOUNTS	NO. OF NET COUNTS	NO. OF DISCOUNTS	NO. OF NET COUNTS
1	Table	0.0	1	0.0	0.0	0.0	0.0	0.0
2	Counter	0.0	1	0.0	0.0	0.0	0.0	0.0
3	Floor	0.0	1	0.0	0.0	0.0	0.0	0.0
4	Wall	0.0	1	0.0	0.0	0.0	0.0	0.0
5	Chair	0.0	1	0.0	0.0	0.0	0.0	0.0
6	Desk	0.0	1	0.0	0.0	0.0	0.0	0.0
7	Shelf	0.0	1	0.0	0.0	0.0	0.0	0.0
8	Shelf	0.0	1	0.0	0.0	0.0	0.0	0.0
9	Shelf	0.0	1	0.0	0.0	0.0	0.0	0.0
10	Shelf	0.0	1	0.0	0.0	0.0	0.0	0.0
11	Shelf	0.0	1	0.0	0.0	0.0	0.0	0.0
12	Shelf	0.0	1	0.0	0.0	0.0	0.0	0.0
13	Shelf	0.0	1	0.0	0.0	0.0	0.0	0.0
14	Shelf	0.0	1	0.0	0.0	0.0	0.0	0.0
15	Shelf	0.0	1	0.0	0.0	0.0	0.0	0.0
16	Shelf	0.0	1	0.0	0.0	0.0	0.0	0.0
17	Shelf	0.0	1	0.0	0.0	0.0	0.0	0.0
18	Shelf	0.0	1	0.0	0.0	0.0	0.0	0.0
19	Shelf	0.0	1	0.0	0.0	0.0	0.0	0.0
20	Shelf	0.0	1	0.0	0.0	0.0	0.0	0.0
21	Shelf	0.0	1	0.0	0.0	0.0	0.0	0.0
22	Shelf	0.0	1	0.0	0.0	0.0	0.0	0.0
23	Shelf	0.0	1	0.0	0.0	0.0	0.0	0.0
24	Shelf	0.0	1	0.0	0.0	0.0	0.0	0.0
25	Shelf	0.0	1	0.0	0.0	0.0	0.0	0.0
26	Shelf	0.0	1	0.0	0.0	0.0	0.0	0.0
27	Shelf	0.0	1	0.0	0.0	0.0	0.0	0.0
28	Shelf	0.0	1	0.0	0.0	0.0	0.0	0.0
29	Shelf	0.0	1	0.0	0.0	0.0	0.0	0.0
30	Shelf	0.0	1	0.0	0.0	0.0	0.0	0.0
31	Shelf	0.0	1	0.0	0.0	0.0	0.0	0.0
32	Shelf	0.0	1	0.0	0.0	0.0	0.0	0.0
33	Shelf	0.0	1	0.0	0.0	0.0	0.0	0.0
34	Shelf	0.0	1	0.0	0.0	0.0	0.0	0.0
35	Shelf	0.0	1	0.0	0.0	0.0	0.0	0.0
36	Shelf	0.0	1	0.0	0.0	0.0	0.0	0.0
37	Shelf	0.0	1	0.0	0.0	0.0	0.0	0.0
38	Shelf	0.0	1	0.0	0.0	0.0	0.0	0.0
39	Shelf	0.0	1	0.0	0.0	0.0	0.0	0.0
40	Shelf	0.0	1	0.0	0.0	0.0	0.0	0.0

CONFIDENTIAL

FILE COPY

1998

BETWEEN:

LICENSE FEE MANAGEMENT BRANCH, ARM
AND
REGIONAL LICENSING SECTIONS

(FOR LFMS USE)
INFORMATION FROM LTS

PROGRAM CODE: 03225
STATUS CODE: 0
FEE CATEGORY: 3P 1D 2C
EXP. DATE: 20060228
FEE COMMENTS: 1D & 2C ADDED 2/8/96
DECOM FIN ASSUR REQ: N

1996 JUL 25 PM 1:28

LICENSE FEE TRANSMITTAL

A. REGION IV

1. APPLICATION ATTACHED
APPLICANT/LICENSEE: INFINITY ANALYTICAL SERVICES, LLC
RECEIVED DATE: 960722
DOCKET NO: 3005948
CONTROL NO: 400150
LICENSE NO: 35-12636-03
ACTION TYPE: AMENDMENT

2. FEE ATTACHED
AMOUNT: \$300.00
CHECK NO.: 0618

3. COMMENTS

SIGNED
DATE

Jackie D. Burks
7/26/96

B. LICENSE FEE MANAGEMENT BRANCH (CHECK WHEN MILESTONE 03 IS ENTERED) ☒

1. FEE CATEGORY AND AMOUNT: 3P 1D 2C \$300

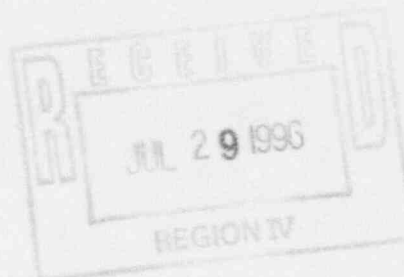
2. CORRECT FEE PAID. APPLICATION MAY BE PROCESSED FOR:

AMENDMENT ☒
RENEWAL ☐
LICENSE ☐

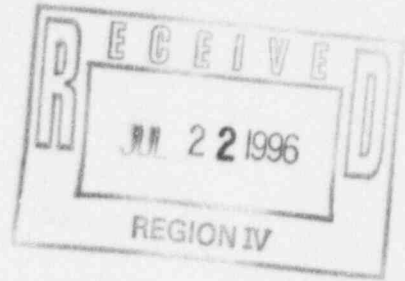
3. OTHER

SIGNED
DATE

Rita Messier
7/26/96



Log	<u>Fee 3 IV</u>
Remitter	<u>IKM Corp</u>
Check No.	<u>0618</u>
Amount	<u>\$300</u>
Fee Category	<u>3P 1D 2C</u>
Type of Fee	<u>Amel</u>
Date Check Rec'd.	<u>7/26/96</u>
Date Completed	<u>7/26/96</u>
By:	<u>Rem</u>



July 18, 1996

Ms. Jackie Burks
U. S. Nuclear Regulatory Commission
Region IV
611 Ryan Plaza Drive
Suite 400
Arlington, Texas 76001

(Sent via fax: 1-817/860-8255 and regular mail)

Re: Infinity Analytical Services, L. L. C. (Infinity)
Request for License Amendment
License No. 35-12636-03

Dear Ms. Burks:

Pursuant to our discussions this correspondence is issued to effect an amendment to our existing license to place such license in an active but possession only status.

In order to meet the requirement set forth for such status, we hereby affirm the following:

1. Infinity has ceased all licensed operations and will not utilize equipment containing source materials or use any source material for any purpose.
2. The source material containing equipment is located at Interstate 40 and Highway 10 in Gore, Oklahoma, in a facility commonly known as the Carsile School. This site is the approved site shown on the existing license. The site contains an alarm system which is monitored 24 hours per day and has access only by Infinity officers and Sequoyah Fuels RSO/President. No daily activities are being conducted at the site.
3. Rick R. Redle, as Vice President of Investment Resource Management, L.P., parent to Infinity until advised otherwise, is the designated responsible party for assuring that the terms of this amendment are adhered to and requirements of the license are complied with. It is our understanding that this party does not have to obtain or maintain any radiation safety certificates. It is also our intent to continue to call upon Sequoyah Fuels' personnel as may be warranted from time to time, to ensure ongoing compliance.

4 6 6 1 5 0

Ms. Jackie Burks
U. S. Nuclear Regulatory Commission
July 18, 1996
Page Two



4. Laboratory and testing facilities will remain inactive with no personnel or testing activity, analytical or otherwise, conducted at the site. Given no operational activity and the lock down of the facilities, we believe the premises to be secure as monitored by alarm security services.
5. With the ceasing of all operational activities and discharging of employees, current personal monitoring dosimetry service will be discontinued; training programs suspended, and instrument access restricted. Site visits by any person will have dosimetry service available to register any exposure to source materials.
6. Infinity shall provide such leak-test of all sealed sources on an annual basis or before any authorized transfer of sources to an authorized recipient.

It is our intention to maintain the license in an active but possession only status until further notice, recognizing that all fees required for same shall be paid timely upon notice of fee due.

Enclosed please find our Check No. NDB 0618 in the amount of \$300.00 for the processing of this amendment. Should you have any questions, please contact our offices at (214) 248-4745.

Sincerely,

Rick Redle
Vice President

RR/mcd

Enclosure(s)

c: R. G. Studer, IRM
Irfan Toor, Texilla Environmental, Inc.
File-md/c:\infinity\nrc.wpd

INFORMATION NEEDED FOR POSSESSION ONLY LICENSE

1. A statement that the licensee has ceased licensed operations and a commitment not to use the material for any purpose.
2. A physical description of the facilities where the material will be stored, if it is different from storage facilities already approved in the license. Identify any facility changes that are planned after the material is placed in storage and provisions to maintain exposure to radiation as low as reasonably achievable (ALARA).
3. Identification of the individual who will be responsible for maintaining control of the stored material. Provide a resume of training and experience, if this information has not already been provided.
4. A description of the accountability program to be implemented by the licensee to ensure that the material remain in secure storage and is not used. The program should provide reasonable assurance that the licensee can maintain security and account for the material (inventory at least annually).
5. A description of planned changes to the licensee's radiation safety program as a result of placing the material in storage. These changes may include, but are not limited to, the following:
 - a. Dosimetry services
 - b. Worker Training programs
 - c. Instrument calibration services
6. A commitment to leak-test sealed sources, if applicable, at least once every 3 years and immediately before transfer to an authorized recipient.
7. A commitment to maintain the license in an active state. (Note that amendment fees will continue to apply).

