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AUG 8 1985

United Technologies
Packard Instrument Company
ATTN: Gerhard H. Kremer, Ph.D.
Vice President and General
Manager
2200 Warrenville Road
Downers Grove, IL 60515

Gentlemen:

This in response to your letter dated September 20, 1983 (copy enclosed) requesting amendment of NRC License Number 12-04933-04G. As discussed in several telephone conversations between Marty Simonin, of your staff, and Jim Myers and me, of the NRC, your letter was originally submitted by James A Gibbs to John Hickey in our Washington, D.C. office and has since been transferred to Region III for processing and review.

It is our understanding from your letter and subsequent telephone conversations, that you desire to distribute iodine-129 and/or iodine-125 in two types of calibration trays (i.e., a twelve and a four position) for use with a multiwell gamma counter. Although we have considered your letter as an application to amend your 12-04933-04G license, there are several options for how your distribution can be licensed by the NRC, depending upon the design of the item (e.g. tray) to be distributed. We have listed the options and the steps you need to take to pursue each one below:

1. Option:

Distribute iodine-125 and/or iodine-129 in trays to persons exempt pursuant to Section 32.18 of 10 CFR Part 32.

Action needed:

- a. Change request to one amending your 12-04933-06E license. In this case the application will be forwarded to our office in Washington, D.C. for review.
- b. Provide the information specified in Sections 32.18, 32.19 and 32.20.

Please note that for this option the total activity in each tray for the desired radionuclide can not exceed the exempt quantities specified in Section 30.71, Schedule B of 10 CFR Part 30 and the packaging must be in accordance with Section 32.19.

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2. Option:

Distribute iodine-125 and/or iodine-129 and rod sources similar to the one depicted in Drawing No. B-6018504 included with your September 1983 letter to persons exempt pursuant to section 32.18 of 10 CFR Part 32.

Action needed:

- a. Change request to one amending your 12-04933-06E license. In this case the application will be forwarded to our office in Washington, D.C. for review.
- b. Provide the information specified in Sections 32.18, 32.19 and 32.20.

Please note that for this option, each source will need to be properly labeled and packaged in accordance with the regulations.

3. Option:

Distribute iodine-125 and/or iodine-129 in calibration trays permanently affixed to a multiwell gamma counter as a device to persons generally licensed pursuant to Section 31.5 of 10 CFR Part 31.

Action needed:

Provide the information specified in Section 32.51 for each radionuclide to be distributed in device.

Please note that for this option, the trays must be permanently affixed to the well counter in order to consider it a device as specified in Section 31.5(a).

We will continue our review of your request upon receipt of notification from you indicating which option you will pursue. Please reply in duplicate, within 30 days, and refer to Control Number 77994.

If it would be more desirable for you or other members of your staff to meet with me concerning this matter, please contact me at (312) 790-5625.

Sincerely,

Original Signed By
Bruce S. Mallett
Materials Licensing Section

Enclosures:

1. September 30, 1983 letter with enclosures
2. 10 CFR Parts 30, 31 and 32

RIII

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Mallett/cm
08/07/05