

OFFICIAL RECORD COPY MATERIALS LICENSE

Amendment No. 27

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 I, Parts 30, 31, 32, 33, 34, 35, 36, 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		In accordance with the letter dated March 10, 1997	
1.	Virginia Polytechnic Institute & State University	3. License Number	45-09475-30
2.	ATTN: Radiation Safety Office	is amended in its entirety to read as follows:	
	Room 104, Building 459, Tech Center Drive	4. Expiration Date	September 30, 2003 (Extended)
	Blacksburg, Virginia 24061	5. Docket or Reference No.	030-11313
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 numbers 3-83, inclusive with a half-life of less than 120 days	A.	Any
B.	Any byproduct material with atomic numbers 3-83, inclusive with a half-life greater than 120 days	B.	Any unsealed byproduct material
C.	Any byproduct material with atomic numbers 3-83, inclusive with a half life greater than 120 days	C.	Sealed sources registered pursuant to 10 CFR 32.210 or an equivalent Agreement State regulation
D.	Any byproduct, source and/or special nuclear material with atomic numbers 84-95 inclusive	D.	Sealed sources registered pursuant to 10 CFR 32.210 or an equivalent Agreement State regulation
E.	Any byproduct material as defined in 10 CFR 40.4 (see also paragraph 11.c(2) of the Atomic Energy Act	E.	As contained in contaminated soil and/or mill tailings
		A.	No single nuclide to exceed 250 millicuries and a total possession limit of 5 curies
		B.	See Condition No. 28
		C.	No single source to exceed 500 millicuries (See Condition No. 28)
		D.	No single byproduct material source to exceed 10 curies, and no single special nuclear material source to exceed 81 grams (see also Condition No. 28)
		E.	100 millicuries (See Condition No. 28)

* Note: The licensee may also possess up to 1 curie each of molybdenum 99 and technetium 99m as generators and up to 1.5 curie of technetium 99m for teaching and training of students in veterinary nuclear medicine.

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MATERIALS LICENSE
SUPPLEMENTARY SHEET

License Number 45-09475-30

Docket or Reference Number 030-11313

Amendment No. 27

ITEMS 6, 7, AND 8 (continued)

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
F. Natural thorium	F. Any	F. 10 millicuries (45 kg)
G. Thorium 230	G. Any	G. 0.1 millicurie
H. Thorium 232	H. Any	H. 0.1 millicurie
I. Natural Uranium	I. Any	I. 10 millicurie
J. Uranium 238	J. Any	J. 10 millicuries
K. Any radioactive material	K. Any environmental sample	K. (See Condition No. 28)
L. Uranium 233	L. Any	L. 0.2 millicurie
M. Uranium 235	M. Any	M. 0.01 millicurie
N. Phosphorus 33	N. Any	N. 2.0 millicuries (74 MBq.)
O. Hydrogen 3	O. Any	O. 5.0 millicuries (185 MBq)
P. Hydrogen 3	P. Any	P. 5.0 curies (185 GBq)

9. Authorized Use:

A. Teaching and training of students. Diagnostic nuclear medicine in animals at the licensee's Veterinary Teaching Hospital and the Marion du Pont Scott Equine Medical Center.

A. through D. Laboratory research including animal studies. Teaching and training of students.

C. and D. Licensed material as sealed sources in compatible portable and non-portable gauging devices and/or gas chromatograph detector cells (registered pursuant to 10 CFR 32.210 or an equivalent Agreement State regulation) may be used for research, process control, measuring properties of materials and/or sample analysis. Licensed material may also be used for teaching and training of students and calibration of instruments.

E. through K. Laboratory research, sample preparation and analysis.

L. and M. Laboratory tracer studies in rocks and minerals.

N. and O. One time field tracer study of phosphorus dynamics in aquatic systems to be conducted in accordance with the licensee's correspondence dated February 8, 1993 [preliminary proposal], April 5, 1993, and June 7 and 22, 1993.

**MATERIALS LICENSE
SUPPLEMENTARY SHEET**

License Number 45-09475-30
Docket or Reference Number 030-11313
Amendment No. 27

9. Authorized Use (continued):
- P. Laboratory research including animal studies. Teaching and training of students.

CONDITIONS

10. Licensed material shall be used at the licensee's facilities located at Virginia Polytechnic Institute & State University, Blacksburg Campus and at specific locations designated below:
- A. Portable moisture/density gauges may also be used at temporary job sites of the licensee anywhere in the United States where the U.S. Nuclear Regulatory Commission maintains jurisdiction for regulating the use of licensed material.
 - B. Laboratory and field tracer studies not involving the release of licensed material to the environment may be performed at the University of Virginia's Mountain Lake Biological Station, Giles County, Virginia only after the licensee has written approval from the property owner.
 - C. Primary productivity studies not involving the release of licensed material to the environment may be performed at temporary job sites of the licensee throughout the State of Virginia.
 - D. Cesium 137 sealed sources of not more than 100 millicuries of cesium 137 and contained in Texas Nuclear Model 5201 fixed gauging devices (registered pursuant to 10 CFR 32.210 or an equivalent Agreement State regulation) may be installed, relocated, used for research purposes and/or removed from installation by the licensee at its temporary job sites located anywhere in the United States where the NRC maintains jurisdiction for regulating the use of licensed material. Concomitantly, the licensee shall: (1) perform installation, relocation, and/or removal of gauging devices in accordance with the device manufacturer's written instructions, (2) conduct and maintain records of surveys to demonstrate compliance with regulatory requirements, (3) maintain a formal written agreement with the management of each activity where licensed material is temporarily possessed and used under this license, (4) provide training as specified in letter dated June 13, 1991 to a designated individual who will maintain radiation safety cognizance over the licensed material until it is removed by Virginia Polytechnic Institute authorized personnel.
 - E. Phosphorus 33 and hydrogen 3 may be used in a one time field tracer study of phosphorus dynamics in aquatic systems at the licensee's temporary job site located at the Coweeta Hydrologic Laboratory in the Nantahala National Forest near Otto, North Carolina.
 - F. Veterinary diagnostic nuclear medicine at the Marion du Pont Scott Equine Medical Center, 542 Old Waterford Road, Leesburg, Virginia.
11. The Radiation Safety Officer for this license is Douglas C. Smiley.
12. Licensed material shall only be used by, or under the supervision of, individuals designated by the Radiation Safety Committee, Kenneth L. Reifsnider, Ph.D., Chairman. The licensee shall maintain records of individuals designated as users and their qualifications to use licensed material for three years after the individual's last use of licensed material. Persons designated as authorized users under this condition shall as a minimum have training and experience commensurate with the provisions of 10 CFR 33.15(b).

**MATERIALS LICENSE
SUPPLEMENTARY SHEET**

License Number 45-09475-30

Docket or Reference Number 030-11313

Amendment No. 27

(Continued)

CONDITIONS

13. Sealed sources or detector cells containing licensed material shall not be opened by the licensee.
14.
 - A. Sealed sources and detector cells shall be tested for leakage and/or contamination at intervals not to exceed 6 months 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 3 months;
 - C. In the absence of a certificate from a transferor indicating that a leak test has been made within six months prior to the transfer, a sealed source or detector cell received from another person shall not be put into use until tested;
 - D. Each sealed source fabricated by the licensee shall be inspected and tested for construction defects, leakage, and contamination prior to any use or transfer as a sealed source;
 - E. 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 or detector cell shall be stored for a period of more than 10 years without being tested for leakage and/or contamination;
 - F. The leak test shall be capable of detecting the presence of 0.005 microcurie of radioactive material on the test sample. Records of leak test results shall be kept in units of microcuries and shall be maintained for inspection by the Commission. 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 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 II, ATTN: Chief, Nuclear Materials Licensing/Inspection Branch, 101 Marietta Street, N.W., Suite 2900, Atlanta, Georgia 30323-0199. The report shall specify the source involved, the test results, and corrective action taken. Records of leak test results shall be kept in units of microcuries and shall be maintained for inspection by the Commission. Records may be disposed of following Commission inspection; and
 - G. 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.

MATERIALS LICENSE
SUPPLEMENTARY SHEET

License Number 45-09475-30

Docket or Reference Number 030-11313

Amendment No. 27

(Continued)

CONDITIONS

15. The licensee shall conduct a physical inventory every 6 months to account for all sources and/or devices received and possessed under the license. Records of inventories shall be maintained for 5 years from the date of each inventory, and shall include the quantities and kinds of byproduct material, manufacturer's name and model numbers, location of the sources and/or devices, and the date of the inventory.
16. The licensee is authorized to transport licensed material only in accordance with the provisions of 10 CFR Part 71, "Packaging and Transportation of Radioactive Material."
17. In lieu of using the conventional radiation caution colors (magenta or purple on yellow background) as provided in 10 CFR 20.203(a)(1), the licensee is hereby authorized to label detector cells, containing licensed material and used in gas chromatography devices, with conspicuously etched or stamped radiation caution symbols.
18. Maintenance, repair, cleaning, replacement and disposal of foils contained in detector cells shall be performed only by the device manufacturer or other persons specifically authorized by the Commission or an Agreement State to perform such services.
19.
 - A. Detector cells containing a titanium tritide foil or a scandium tritide foil shall only be used in conjunction with a properly operating temperature control mechanism which prevents the foil temperature from exceeding that specified by the manufacturer and approved by NRC; and
 - B. When in use, detector cells containing a titanium tritide foil or a scandium tritide foil shall be vented to the outside.
20. Each portable nuclear gauge shall have a lock or outer locked container designed to prevent unauthorized or accidental removal of the sealed source from its shielded position. The gauge or its container must be locked when in transport, storage or when not under the direct surveillance of an authorized user.
21. Any cleaning, maintenance, or repair of the gauge(s) that requires removal of the source rod shall be performed only by the manufacturer or by other persons specifically licensed by the Commission or an Agreement State to perform such services.
22. Each non-portable gauge shall be tested for the proper operation of the on-off mechanism and indicator, if any, at no longer than six-month intervals or at such longer intervals as specified by the manufacturer and approved by NRC.

MATERIALS LICENSE
SUPPLEMENTARY SHEET

License Number 45-09475-30

Docket or Reference Number 030-11313

Amendment No. 27

(Continued)

CONDITIONS

23. Installation, initial radiation survey, relocation, or removal from service of devices containing sealed sources shall be performed by the licensee or by persons specifically licensed by the Commission or an Agreement State to perform such services. Maintenance and repair of devices and installation, replacement, and disposal of sealed sources shall be performed only by persons specifically licensed by the Commission or an Agreement State to perform such services.
24. Prior to initial use and after installation, relocation, dismantling, alignment, or any other activity involving the source, the source housing of non-portable gauging devices or removal of the shielding, the licensee shall assure that a radiological survey is performed to determine radiation levels in accessible areas around, above and below the gauge with the shutter open. This survey shall be performed only by persons authorized to perform such services by the Commission or an Agreement State. A record of the results of this survey shall be maintained for the duration of the license.
25. The licensee shall operate each non-portable gauge within the manufacturer's specified temperature and/or environmental limits such that the shielding and shutter mechanism of the source holder are not compromised.
26. In addition to the possession limits in Item 8, the licensee shall further restrict the possession of licensed material to quantities below the limits specified in 10 CFR 30.72 which require consideration of the need for an emergency plan for responding to a release of licensed material.
27. The licensee shall maintain records of information related to decommissioning at the licensee's address specified in item 2 above as specified in 10 CFR 30.35(g), 40.36(f) and/or 70.25(g) until this license is terminated by the Commission.
28. In addition to the possession limits in Condition 8, the licensee shall further restrict the possession of unsealed licensed material to quantities less than 10^5 times the applicable limits in Appendix C of 10 CFR Part 20, or 100 millicuries of readily dispersible source material as specified in 10 CFR 30.35(d), or 70.25(d) or 40.36(b) respectively. The sum of the ratios for all unsealed radionuclides possessed under the license shall not exceed 100.
29. The licensee is authorized to hold radioactive material with a physical half-life of less than 90 days for decay-in-storage before disposal in ordinary trash provided:
 - A. Radioactive waste to be disposed of in this manner shall be held for decay a minimum of 10 half-lives;
 - B. Before disposal as ordinary trash, byproduct material shall be surveyed at the container surface with the appropriate meter set on its most sensitive scale and with no interposed shielding to determine that its radioactivity cannot be distinguished from background. All radiation labels shall be removed or obliterated;

**MATERIALS LICENSE
SUPPLEMENTARY SHEET**

License Number 45-09475-30

Docket or Reference Number 030-11313

Amendment No. 27

(Continued)

CONDITIONS

29. C. Generator columns shall be segregated so that they may be monitored separately to ensure decay to background levels prior to disposal; and
- D. A record of each disposal permitted under this license condition shall be retained for three years. The record must include the date of disposal, the date on which the byproduct material was placed in storage, the radionuclides disposed of, the survey instrument used, the background dose rate, the dose rate measured at the surface of each waste container, and the name of the individual who performed the disposal.
30. Licensed material shall not be used in or on human beings.
31. This license does not authorize commercial distribution of licensed material.
32. The licensee shall not use licensed material in field applications where activity is released except as provided otherwise by specific condition of this license.
33. Experimental animals, or the products from experimental animals, that have been administered licensed materials shall not be used for human consumption.
34. The licensee shall not acquire licensed material in a sealed source or device that contains a sealed source unless the source or device has been registered with the Nuclear Regulatory Commission under 10 CFR 32.210 or with an Agreement State.
35. The licensee shall not vacate or release to unrestricted use a field office or storage location whose address is identified in Condition 10, without prior NRC written approval. Reports of residual levels of contamination or other information concerning facility status may be required.
36. Pursuant to 10 CFR Part 40, "Domestic Licensing of Source Material," the licensee is authorized to possess, use, transfer, and import up to 999 kilograms of depleted uranium contained as shielding material¹.
37. The licensee shall elute generators and process radioactive material with reagent kits in accordance with instructions furnished by the manufacturer on the label attached to or in the leaflet or brochure that accompanies the generator or reagent kit.

**MATERIALS LICENSE
SUPPLEMENTARY SHEET**

License Number 45-09475-30

Docket or Reference Number 030-11313

Amendment No. 27

(Continued)

CONDITIONS

38. 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 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:

May 21, 1992

B. Letters dated:

- (1) February 28, 1991
- (2) June 13, 1991
- (3) May 6, 1993
- (4) June 15, 1993
- (5) February 8, 1993 [preliminary proposal for field study]
- (6) April 5, 1993 [proposal for one time field study]
- (7) June 4, 1993 [supplemental information about field study]
- (8) June 22, 1993 [with attachment dated June 7, 1993]
- (9) June 13, 1994, September 19, 1994, October 28, 1994, and November 29, 1994
[addition of veterinary diagnostic nuclear medicine at the Marion du Pont Scott Equine Medical Center, increase in Tc-99m possession limit, and new radiation safety committee chairman]
- (10) January 31, 1995 [replace Radiation Safety Handbook]
- (11) May 8, 1995 and May 18, 1995
[Change release limits for equines inside Center, and dose to the public from equines]
- (12) March 1, 1996 [NRC letter extends expiration date in accordance with 10 CFR 30.36]
- (13) August 2, 1996 [Change Chairman, Radiation Safety Committee]
- (14) March 10, 1997 [Change waste storage area to a temporary location due to renovations of current waste storage building]

C. Radiation Safety Handbook dated November 21, 1994.

FOR THE U.S. NUCLEAR REGULATORY COMMISSION

EARL G. WRIGHT

DATE

MAR 21 1997

BY

Earl G. Wright

Region II, Division of Nuclear Materials Safety
101 Marietta Street, N.W., Suite 2900
Atlanta, Georgia 30323-0199

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UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION II
101 MARIETTA STREET, N.W., SUITE 2900
ATLANTA, GEORGIA 30323-0199

MAK 24 1997

INFORMATION FOR NRC MATERIAL LICENSEES

Please find enclosed: _____ Your NRC material license
 ☒ Amendment to your NRC material license
 _____ Amendment renewing your NRC material license
 _____ Amendment terminating your NRC material license
 _____ Notice for Radiographer Quality Assurance Approval Program

Please review the enclosed document carefully and be sure that you understand all conditions. If there are any errors or questions, please notify this office (ATTN: Ms. Diane Heim at (404) 331-4673) so that we can provide appropriate corrections and answers.

Please be advised that your license expires at the end of the day in the month and year stated in the license. Unless your license has been terminated, you must conduct your program involving byproduct 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 19, "Notice, Instructions and Reports to Workers; Inspections," 10 CFR Part 20, "Standards for Protection Against Radiation," and other applicable regulations.
2. Not possess and use materials authorized in Items 6, 7, and 8, on the license until:
 - a. you have constructed the facilities and obtained the equipment described in the license application and supporting documentation; and
 - b. you have notified the U. S. Nuclear Regulatory Commission, Region II, ATTN: Materials Licensing/Inspection Branch, in writing, that activities authorized by the license will be initiated.
 - c. you have submitted and certified implementation of a Quality Management Program (10 CFR 35.32) for radiotherapy, or for administering > 30 uCi of I-125 or I-131.
3. Notify NRC, in writing, within 30 days:
 - a. when an authorized user, Radiation Safety Officer, or Teletherapy Physicist permanently discontinues performance of duties under the license or has a name change; or
 - b. when the licensee's mailing address changes (no fee is required if the location of byproduct material remains the same).
4. In accordance with 10 CFR 30.36(b) and/or license condition, notify NRC, promptly, in writing, and request termination of the license:
 - a. when you decide to terminate all activities involving materials authorized under the license; or
 - b. if you decide not to complete the facility, acquire equipment, or possess and use authorized material.

5. Request and obtain a license amendment before you:
 - a. receive or use byproduct material for a clinical procedure permitted under Part 35 but not permitted by your license issued pursuant to this part.
 - b. permit anyone, not authorized under 10 CFR 35, Subpart J, to work as an authorized user under a license for medical use of byproduct material.
 - c. permit anyone, not authorized under 10 CFR 35, Subpart J, to work as a Radiation Safety Officer, Teletherapy Physicist, or Nuclear Pharmacist, under a license for medical use of byproduct material.
 - d. order byproduct material in excess of the amount, or a different radionuclide or form, other than authorized on the license;
 - e. add or change the areas of use or address (or addresses) of use identified in the license application or on the license; or
 - f. change ownership of your organization.
6. Submit a complete renewal application with proper fee or termination request at least 30 days before the expiration date of your license. You will receive a reminder notice approximately 90 days before the expiration date. Possession of byproduct material after your license expires is a violation of NRC regulations. Transfer of licensed materials must be consistent with 10 CFR 30.41, 40.51 or 70.42, as applicable. A license will not normally be renewed, except on a case-by-case basis, in instances where licensed material has never been possessed or used.

In addition, please note that NRC Form 313 requires the applicant, by his/her signature, to verify that the applicant understands that all statements contained in the application are true and correct to the best of the applicant's knowledge. The signatory for the application should be the licensee or certifying official rather than a consultant.

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, or imposition of a Civil Penalty, or an order suspending, modifying or revoking your license as specified in the "General Statement of Policy and Procedures for NRC Enforcement Actions," NUREG-1600, (7/95). Since serious consequences to employees and the public can result from failure to comply with NRC requirements, prompt and vigorous enforcement action will be taken against those who do not achieve the necessary attention to detail and standard of compliance expected of licensees.

Thank you for your cooperation.

Enclosures:

1. NRC License
2. Category Marked Below for:
 - ☐ New licenses: NUREG-1600 (7/95); 19; 20; 30; 40 or 70, as appropriate; 71; 170; NRC Form 3; Agreement State list; and NRC Form 313.
 - ☐ New radiography licenses: Parts 34; 150.
 - ☐ New medical and teletherapy licenses: Part 35.
 - ☐ Amendments and renewals: NRC Form 313.

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BETWEEN:

License Fee Management Branch, ARM
and
Regional Licensing Sections

: (FOR LFMS USE)
: INFORMATION FROM LTS
: -----
: Program Code: 01100
: Status Code: 0
: Fee Category: EX 3L 1D 2C
: Exp. Date: 20030930
: Fee Comments: 170.11(A)(4)
: Decom Fin Assur Req: Y
: ::::::::::::::::::::::::::::::

1997 MAR 14 AM 8:40

LICENSE FEE TRANSMITTAL

A. REGION II

1. APPLICATION ATTACHED

Applicant/Licensee: VIRGINIA POLYTECHNIC INSTITUTE &
Received Date: 970310
Docket No: 3011313
Control No.: 257415
License No.: 45-09475-30
Action Type: Amendment

2. FEE ATTACHED

Amount: NONE
Check No.: _____

3. COMMENTS

Signed DIANE L. EIM
Date 3/11/97

B. LICENSE FEE MANAGEMENT BRANCH (Check when milestone 03 is entered) ☒

1. Fee Category and Amount: EX 3L 1D 2C

FEE EXEMPT

2. Correct Fee Paid. Application may be processed for:

Amendment ☒
Renewal _____
License _____

170-11(A)(4)

3. OTHER _____

Signed Arthur Spasson
Date 3/14/97

RECEIVED BY LFMS	
Date	<u>3/14/97</u>
Log	<u>Mar II</u>
By	<u>fer</u>
Date Completed	<u>3/14/97</u>



March 10, 1997

Mr. Earl Wright
USNRC, Region II
Suite 2900
101 Marietta Street
Atlanta, GA 30323

Dear Mr. Wright:

Virginia Tech requests that its broad license #45-09475-30 be amended. The specifics are attached. Your prompt assistance in this matter is appreciated.

If you have any questions or any further information is needed, please contact Doug Smiley at (540)231-5364.

Sincerely,

Ken Reifsnider
Radiation Safety Committee
Chairman

Proposed Amendment to NRC License #45-09475-30

Our Waste Storage Building (WSB) will be undergoing renovations shortly. This process will require the relocation of many containers of radioactive material. The contents of the containers include: radioactive waste being held for decay, radioactive waste being accumulated for disposal, sealed sources in storage and sealed sources limitedly used.

It is requested to allow relocation of these containers to a temporary area inside of a tractor trailer. The trailer will be maintained locked when in use and will be parked next to the WSB inside of a locked chain link fence.

All containers will be wipe tested to ensure no presence of contamination greater than 220 dpm/100 cm² prior to relocation to the trailer. A GM and wipe test survey will be conducted on any areas in the WSB before renovation work will be permitted. A GM and wipe test survey will be conducted on the trailer prior to its return to the vendor.