

APPLICATION FOR MATERIAL LICENSE

INSTRUCTIONS: SEE THE APPROPRIATE LICENSE APPLICATION GUIDE FOR DETAILED INSTRUCTIONS FOR COMPLETING APPLICATION. SEND TWO COPIES OF THE ENTIRE COMPLETED APPLICATION TO THE NRC OFFICE SPECIFIED BELOW.

FEDERAL AGENCIES FILE APPLICATIONS WITH:

U.S. NUCLEAR REGULATORY COMMISSION
DIVISION OF FUEL CYCLE AND MATERIAL SAFETY, NMSS
WASHINGTON, DC 20555

ALL OTHER PERSONS FILE APPLICATIONS AS FOLLOWS, IF YOU ARE LOCATED IN:

CONNECTICUT, DELAWARE, DISTRICT OF COLUMBIA, MAINE, MARYLAND,
MASSACHUSETTS, NEW JERSEY, NEW YORK, PENNSYLVANIA, RHODE ISLAND,
OR VERMONT, SEND APPLICATIONS TO:

U.S. NUCLEAR REGULATORY COMMISSION, REGION I
NUCLEAR MATERIAL SECTION B
631 PARK AVENUE
KING OF PRUSSIA, PA 19406

ALABAMA, FLORIDA, GEORGIA, KENTUCKY, MISSISSIPPI, NORTH CAROLINA,
PUERTO RICO, SOUTH CAROLINA, TENNESSEE, VIRGINIA, VIRGIN ISLANDS, OR
WEST VIRGINIA, SEND APPLICATIONS TO:

U.S. NUCLEAR REGULATORY COMMISSION, REGION II
MATERIAL RADIATION PROTECTION SECTION
101 MARIETTA STREET, SUITE 2900
ATLANTA, GA 30323

IF YOU ARE LOCATED IN

ILLINOIS, INDIANA, IOWA, MICHIGAN, MINNESOTA, MISSOURI, OHIO, OR
WISCONSIN, SEND APPLICATIONS TO:

U.S. NUCLEAR REGULATORY COMMISSION, REGION III
MATERIALS LICENSING SECTION
799 ROOSEVELT ROAD
GLEN ELLYN, IL 60137

ARKANSAS, COLORADO, IDAHO, KANSAS, LOUISIANA, MONTANA, NEBRASKA,
NEW MEXICO, NORTH DAKOTA, OKLAHOMA, SOUTH DAKOTA, TEXAS, UTAH,
OR WYOMING, SEND APPLICATIONS TO:

U.S. NUCLEAR REGULATORY COMMISSION, REGION IV
MATERIAL RADIATION PROTECTION SECTION
811 RYAN PLAZA DRIVE, SUITE 1000
ARLINGTON, TX 76011

ALASKA, ARIZONA, CALIFORNIA, HAWAII, NEVADA, OREGON, WASHINGTON,
AND U.S. TERRITORIES AND POSSESSIONS IN THE PACIFIC, SEND APPLICATIONS
TO:

U.S. NUCLEAR REGULATORY COMMISSION, REGION V
MATERIAL RADIATION PROTECTION SECTION
1450 MARIA LANE, SUITE 210
WALNUT CREEK, CA 94596

PERSONS LOCATED IN AGREEMENT STATES SEND APPLICATIONS TO THE U.S. NUCLEAR REGULATORY COMMISSION ONLY IF THEY WISH TO POSSESS AND USE LICENSED MATERIAL IN STATES SUBJECT TO U.S. NUCLEAR REGULATORY COMMISSION JURISDICTION.

1. THIS IS AN APPLICATION FOR (Check appropriate item)

- ☒ A. NEW LICENSE
☐ B. AMENDMENT TO LICENSE NUMBER _____
☐ C. RENEWAL OF LICENSE NUMBER _____

2. NAME AND MAILING ADDRESS OF APPLICANT (Include Zip Code)

Pogue Industries Incorporated
4961 Caribee Drive
St. Louis, Mo. 63128

3. ADDRESS(ES) WHERE LICENSED MATERIAL WILL BE USED OR POSSESSED:

Pogue Industries Incorporated
c/o Energy Support Inc.
5200 Manchester
St. Louis, Mo. 63110

8510040236 850909
REG3 LIC30
24-24541-01 PDR

4. NAME OF PERSON TO BE CONTACTED ABOUT THIS APPLICATION

Steven Pogue

TELEPHONE NUMBER

(314) 892-4934

SUBMIT ITEMS 5 THROUGH 11 ON 8 1/2 x 11" PAPER. THE TYPE AND SCOPE OF INFORMATION TO BE PROVIDED IS DESCRIBED IN THE LICENSE APPLICATION GUIDE.

5. RADIOACTIVE MATERIAL

a. Element and mass number, b. chemical and/or physical form, and, c. maximum amount
which will be possessed at any one time.

6. PURPOSE(S) FOR WHICH LICENSED MATERIAL WILL BE USED.

7. INDIVIDUAL(S) RESPONSIBLE FOR RADIATION SAFETY PROGRAM AND THEIR
TRAINING AND EXPERIENCE.

8. TRAINING FOR INDIVIDUALS WORKING IN OR FREQUENTING RESTRICTED AREAS.

9. FACILITIES AND EQUIPMENT.

10. RADIATION SAFETY PROGRAM

11. WASTE MANAGEMENT.

12. LICENSEE FEES (See 10 CFR 170 and Section 170.31)

FEE CATEGORY 49FR21293

AMOUNT
ENCLOSED \$ 580.00

13. CERTIFICATION. (Must be completed by applicant) THE APPLICANT UNDERSTANDS THAT ALL STATEMENTS AND REPRESENTATIONS MADE IN THIS APPLICATION ARE
BINDING UPON THE APPLICANT.

THE APPLICANT AND ANY OFFICIAL EXECUTING THIS CERTIFICATION ON BEHALF OF THE APPLICANT, NAMED IN ITEM 2, CERTIFY THAT THIS APPLICATION IS
PREPARED IN CONFORMITY WITH TITLE 10, CODE OF FEDERAL REGULATIONS, PARTS 30, 32, 33, 34, 35, AND 40 AND THAT ALL INFORMATION CONTAINED HEREIN,
IS TRUE AND CORRECT TO THE BEST OF THEIR KNOWLEDGE AND BELIEF.

WARNING: 18 U.S.C. SECTION 1001 ACT OF JUNE 25, 1948, 62 STAT. 749 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.

SIGNATURE—CERTIFYING OFFICER

TYPED/PRINTED NAME

TITLE

DATE

Steven W. Pogue

Steven W. Pogue

President

18 July 85

14. VOLUNTARY ECONOMIC DATA

a. ANNUAL RECEIPTS

☒ < \$250K
☐ \$250K—500K
☐ \$500K—750K
☐ \$750K—1M

b. NUMBER OF EMPLOYEES (Total for
entire facility excluding outside contractors)

5

c. NUMBER OF BEDS

None

d. WOULD YOU BE WILLING TO FURNISH COST INFORMATION (Dollar and/or staff hours)
ON THE ECONOMIC IMPACT OF CURRENT NRC REGULATIONS OR ANY FUTURE
PROPOSED NRC REGULATIONS THAT MAY AFFECT YOU? (NRC regulations permit
it to protect confidential commercial or financial—proprietary—information furnished to
the agency in confidence)

☒ YES

☐ NO

FOR NRC USE ONLY

NO. OF FEE

FEE LOG

FEE CATEGORY

COMMENTS

APPROVED BY

DATE

appd July 19

30

30

265

cap

7/29/85

CONTROL NO. 7 936 8

PRIVACY ACT STATEMENT

Pursuant to 5 U.S.C. 552a(e)(3), enacted into law by section 3 of the Privacy Act of 1974 (Public Law 93-579), the following statement is furnished to individuals who supply information to the Nuclear Regulatory Commission on NRC Form 313. This information is maintained in a system of records designated as NRC-3 and described at 40 Federal Register 45334 (October 1, 1975).

1. **AUTHORITY:** Sections 81 and 161(b) of the Atomic Energy Act of 1954, as amended (42 U.S.C. 2111 and 2201(b)).
2. **PRINCIPAL PURPOSE(S):** The information is evaluated by the NRC staff pursuant to the criteria set forth in 10 CFR Parts 30, 32, 33, 34, 35 and 40 to determine whether the application meets the requirements of the Atomic Energy Act of 1954, as amended, and the Commission's regulations, for the issuance of a radioactive material license or amendment thereof.
3. **ROUTINE USES:** The information may be (a) provided to State health departments for their information and use; and (b) provided to Federal, State, and local health officials and other persons in the event of incident or exposure, for their information, investigation, and protection of the public health and safety. The information may also be disclosed to appropriate Federal, State, and local agencies in the event that the information indicates a violation or potential violation of law and in the course of an administrative or judicial proceeding. In addition, this information may be transferred to an appropriate Federal, State, or local agency to the extent relevant and necessary for an NRC decision or to an appropriate Federal agency to the extent relevant and necessary for that agency's decision about you.
4. **WHETHER DISCLOSURE IS MANDATORY OR VOLUNTARY AND EFFECT ON INDIVIDUAL OF NOT PROVIDING INFORMATION:** Disclosure of the requested information is voluntary. If the requested information is not furnished, however, the application for radioactive material license, or amendment thereof, will not be processed. A request that information be held from public inspection must be in accordance with the provisions of 10 CFR 2.790. Withholding from public inspection shall not affect the right, if any, of persons properly and directly concerned need to inspect the document.
5. **SYSTEM MANAGER(S) AND ADDRESS:** U.S. Nuclear Regulatory Commission
Director, Division of Fuel Cycle and Material Safety
Office of Nuclear Material Safety and Safeguards
Washington, D.C. 20555

STEVE POGUE CONSULTING SERVICES

4961 CARIBEE DR.
ST. LOUIS, MO 63128

1252

PAY
TO THE
ORDER OF

July 18 19 85
U.S. NUCLEAR Regulatory Commission \$ 580 ⁰⁰/₁₀₀
Five Hundred & eighty ⁰⁰/₁₀₀ DOLLARS

County Bank of Webster Groves
8043 Big Bend Blvd. / 8080 Watson Road
Webster Groves, MO 63119

FOR

49 FR 21293

Steve Pogue

⑈001252⑈ ⑈081018451⑈ ⑈8024402⑈

ATTACHMENT #1

To Aid in the control and distribution of paperwork (procedures and forms) associated with PII's Radiographic License and Emergency and Operating procedures. PII has broken down the requirements of Items 5 - 11 of NRC Form 313 as outlined in Reg Guide 10.6 Appendix B into mini-procedures. This was done to isolate the items which are used on a day-today basis from those which are used occasionally, making it easier for the radiographers, assistant radiographers and trainees to use and understand. As a minimum, all radiographers, assistant radiographers, and trainees will receive the basic Operation and Emergency Procedures (procedure 10.4.B).

Since duties such as leak tests, survey meter calibration, source changing, etc. Are not performed daily, and when they are performed, they are only done by supervisory personnel or a limited number of non-supervisory personnel specifically trained for those purposes, procedures written for those specific items will be made available to those who have been properly trained for those duties.

The attached matrix for operation and emergency procedures will identify the primary and secondary procedure requirements to address items 5 - 11 of NRC Form 313 which references Reg. Guide 10.6, Appendix B.

POGUE INDUSTRIES INCORPORATED

MATRIX FOR OPERATION AND EMERGENCY PROCEDURES

FORM 313

<u>ITEM</u>	<u>DESCRIPTION</u>	<u>ATTACHMENT OR PROCEDURE</u>
#5	Radioactive Material	Attachment A
#6	Purpose(s) for which licensed material will be used	Attachment B
#7	Individual(s) responsible for radiation Safety Program and their training and experience	10.6.A
#8	Training for individuals working in or frequenting restricted areas (procedure)	10.7.A
	Training Procedure	10.7.B
#9	Facilities and Equipment	Attachment C
#10	RADIATION SAFETY PROGRAM	
	Personnel Monitoring	10.1.A
	Radiation Detection Devices	10.2.A
	Survey Instrument Calibration (outside vendors)	10.2.B
	Survey Instrument Calibration (performed by PII)	10.2.C
	Audit Procedure	10.3.A
	Corrective Action Report	10.3.B
	Documentation Procedure	10.3.C
	Use, Maintenance and Repair of Shipping Containers for Radioactive Materials	10.3.D
	Forms Procedure	10.3.E
	Source Shipping/Receiving/Transfer/ Disposal Procedure	10.3.F
	Source Changing Procedure	10.3.G
	Maintenance Procedure	10.3.H
	Operating and Emergency System Procedure (management)	10.4.A
	Operating and Emergency Procedures (personnel)	10.4.B
	Leak Testing Procedure	10.5.A

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MATRIX (cont.)

#10 (cont.)

Radiation Safety Control and Organization	10.6.A
Qualification and Certification Procedure	10.7.A
Training Procedure	10.7.B

#11	Waste Management	Attachment D
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ATTACHMENT A

EXPOSURE DEVICES, SOURCES AND SOURCE CHANGES

Exposure Device Manufacture	Exposure Device Model	Source Manufacture	Source Model #	By Product Material	Maximum Authority Per Source	Source Changers
Gamma Industries	Gamma Century SA and Gamma Century S	Gamma Industries	A-2-A	IR-192	100 curies	Gamma Industries C-10
		Indust. Nuclear	2	IR-192	100 curies	
		Indust. Nuclear	8	IR-192	100 curies	
		Tech OPS	848	IR-192	100 curies	
	Gamma 35SA and Gamma 35S	Gamma Industries	A-2-A	IR-192	35 curies	Gamma Industries C-10
		Indust. Nuclear	2	IR-192	35 curies	
		Indust. Nuclear	8	IR-192	35 curies	
		Tech OPS	848	IR-192	35 curies	
	Gammatron 100 Gammatron 50	Gamma Industries	A-8-A	Co 60	100 curies	Devices will be returned to manu- facturer. Gamma Industries will change.
		Gamma Industries	A-8-A	Co 60	50 curies	
Tech OPS	900	Tech OPS	90003	IR-192	100 curies	Tech OPS 850
	910		91003	IR-192	25 curies	
	920		9003	IR-192	200 curies	
	660	Tech OPS	A 424-9	IR-192	100 curies	Tech OPS 650
		Indust. Nuclear	#7	IR-192	100 curies	
		Gamma Industries	T-3-T	IR-192	100 curies	
	533	Tech OPS	A 424-1	IR-192	100 curies	Tech OPS 650
		Indust. Nuclear	#1	IR-192	100 curies	
		Gamma Industries	T4	IR-192	100 curies	
	733 Inst. Calibrator	Tech OPS	77302	CS-137	165 micro curies	N/A
Magnaflux	IC 100	Indust. Nuclear	#9	IR-192	100 curies	Industrial Nuclear IR 50
		Gamma Industries	#MIA	IR-192	100 curies	
			#MIT	IR-192	100 curies	
Industrial Nuclear IR 100		Indust. Nuclear	#32 and	IR-192	100 curies	Industrial Nuclear IR 50
			#33	IR-192	100 curies	

ATTACHMENT B

ITEM #6 Purpose(s) for which licensed material will be used.

STATEMENT:

Radiographic exposure devices will be used for the performance of Industrial Radiography. Source changers will be used for Source Exchange in Accordance with Attachment A.

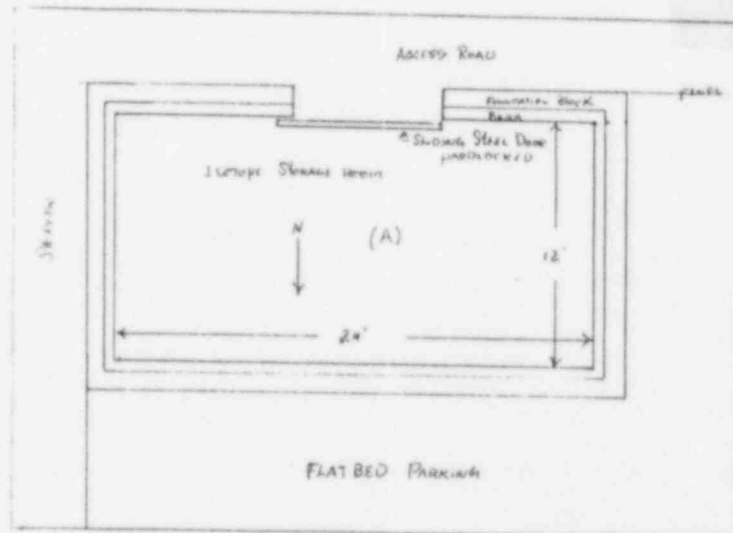
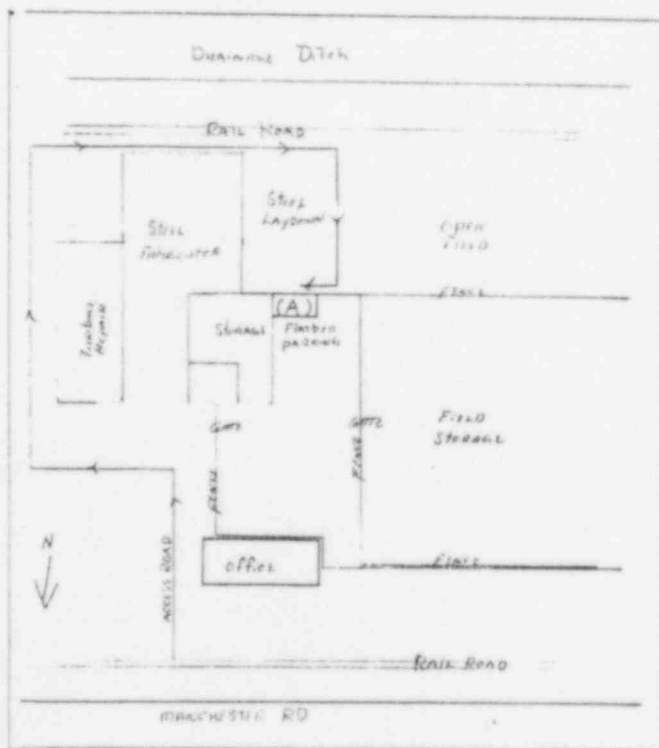
POGUE INDUSTRIES INCORPORATED

CONTROL NO. 7 936 8

ATTACHMENT C

Storage Facility at 5200 Manchester St. Louis, Mo.

- 1) Iridium 192 Sources shall be stored in lead lined wooden box with locking door. Box will be designed so that outside surface reads 2 mr/hr or less. It will be secured to prevent unauthorized movement.
- 2) Cobalt 60 Sources, if used, will be stored and secured so as to prevent unauthorized movement or the surface of the storage area, not to exceed 2 mr/hr.
- 3) At present no Laboratory Facility or permanent exposure room exists. This is a storage facility only and all jobs at present will be Field jobs. Plans are being made for a facility and appropriate steps will be taken for License Amendments at a later date.
- 4) Storage Area will be properly identified in accordance with applicable regulations.



ATTACHMENT D

ITEM #11: Waste Management

STATEMENT: Sources shall be disposed of by returning to the supplier.

POGUE INDUSTRIES INCORPORATED

CONTROL NO. 7 936 8