

DLR/... (13463)

December 5, 1958

Mr. Albert E. Lombard, Jr.  
Director of Research  
McDonnell Aircraft Corporation  
P. O. Box 6101  
St. Louis, Missouri

Subject: APPLICATION FOR BYPRODUCT MATERIAL LICENSE

Dear Mr. Lombard:

Reference is made to your application of October 6, 1958 for Byproduct Material License. In order to continue the review of your application, we are requesting clarification and consideration of the following items:

1. The supporting information with the application contains reference to an Isotopes Committee but does not specify by name the persons making up this committee. Please furnish these names together with the training and experience with radioactive materials of the persons on the committee.
2. The name of the manufacturer and the model number will be required for the Cobalt-60 sealed sources listed in your application.
3. The use to be made of the 2 curie Cobalt-60 sources should be more clearly explained. Radiography by in-air techniques using Cobalt-60 sources in excess of one curie is not recommended by this office. Your attention is directed to the enclosed announcement "Information on Licensing of Industrial Radiography Programs" in this regard. Information on the tagging of these sources and a discussion of the transporting and storage containers is also requested.
4. The statement of use of the Iodine-131 is not sufficiently specific. Please indicate the laboratory tracer studies to be performed.

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Form ABC-618 (Rev. 9-58)

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5. Sodium-226 is not a byproduct material (reactor produced radioisotopes) and is not within the licensing jurisdiction of this office.
6. In evaluating your application, the submitted procedures will be considered as a firm part of your program and distribution of the procedures to personnel will be required. If the procedures can be finalized and submitted at this time, the necessity of a future evaluation and license modification can be avoided.
7. Your draft procedures concerning maximum permissible levels of exposure are not clear as to whether your "MPL" is to be 100 mrem per week or 300 mrem per week. Further, an "emergency overexposure" of your personnel will in fact effect their "radiation tolerance status" (see Section 20.105, "Standards for Protection Against Radiation", Title 10, Code of Federal Regulations, Part 20). Also, the exposure to non-radiation workers is controlled by Section 20.102(b), 10-CFR-20 which does not include averaging over a year. It is suggested that these items be considered in finalizing your procedures.
8. A letter from Mr. W. L. Kester is being considered in conjunction with the application which proposes the tagging of tools other than bushing bars with a microcuries of Cesium-137. To evaluate this proposal, we are requesting a statement of the purpose of such tagging.

The review of your application will be resumed upon the receipt of clarification of these items.

Very truly yours,

Robert H. Brinkman  
Senior Licensing Reviewer  
Isotopes Branch  
Division of Licensing and Regulation

Enclosures:

1. 10-CFR-20
2. 20-17

OFFICE	DLE/IB					
REMARKS	REBrinkman/dg					
DATE	12/4/58					