

AUG 23 1985

Docket No. 030-21277
Control No. 103959

Independent Testing Laboratories, Inc.
ATTN: Mr. Robert E. Tolley
Vice President
14650 Southlawn Lane, Suite 4
Rockville, Maryland 20850-1317

Gentlemen:

This is in reference to your application dated June 10, 1985 for a byproduct material license. In order to continue our review, we need the following additional information:

1. Item No. 7 of your "Control Procedures for Radioactive Materials" refers to leak testing. Please specify the kit model number and the name, address, and license number of the kit supplier and the consultant who will perform the evaluation.
2. Please confirm that no maintenance will be performed that involves removing the source or placing it in an unshielded position.
3. Please confirm that when transporting devices to field locations, the packaging and transport of the device will be carried out in accordance with applicable DOT regulations. See Section 10.5 of the enclosed guide.
4. In Item No. 8, Number 2 of your application, you have listed Ce 137. This should be Cs 137.

We will continue our review upon receipt of this information. Please reply in duplicate to my attention at the Region I office and refer to Mail Control No. 103959.

Sincerely,

Original Signed By:
John D. Kinneman

John D. Kinneman, Chief
Nuclear Materials Safety Section A
Division of Radiation Safety
and Safeguards

Enclosure: "Guide For the Preparation of Applications For
Licenses For the Use Of Sealed Sources in
Portable Gauging Devices"

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REG1 LIC30
19-20864-01 PDR

ML10

RI:DRSS *m.p.*
Piccone *rw*
8/7/85

VW
RI:DRSS
Kinneman
8/14/85

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ML 005 PICCONE 8/6/85 - 0002.0.0
08/06/85



14650 Southlawn Lane, Suite 4
Rockville, Maryland 20850
(301) 424-3090

June 21, 1985

State of Maryland
Division of Radiation Control
201 West Preston Street
Baltimore, Maryland 21201

Attention: Mr. Charles Fenton

Re: Application for Radioactive Material License
Independent Testing Laboratories, Inc.
14650 Southlawn Lane, Suite 4
Rockville, MD 20850

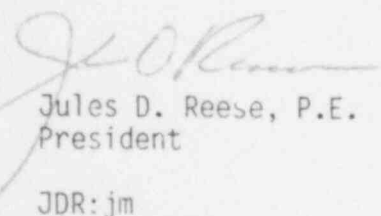
Dear Mr. Fenton:

Pursuant to our phone discussion, please review our revised Control Procedures, paragraphs 1.0 B, 2.0 B, and 7.0. These paragraphs have been altered to encompass the areas of concern which you related.

We hope that the above meets with your favorable response. Should you have any questions concerning the attached, please contact our office.

Very truly yours,

ITL, Inc.


Jules D. Reese, P.E.
President

JDR:jm
cc: Dr. John Glenn

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"OFFICIAL RECORD COPY"

JUN 25 1985

May 28, 1985

Maryland Dept. of Health & Mental Hygiene
Division of Radiological Control
201 West Preston Street
Baltimore, Maryland 21201

Attention: Mr. Thomas Ferguson

Re: Control Procedures - ITL
Troxler Nuclear Moisture-Density Gauge

Dear Mr. Ferguson:

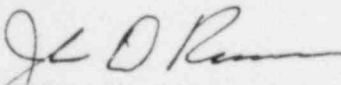
We are planning on the purchase of a Troxler nuclear soil profile gauge.
It is our intent to apply for an NRC license to use the same gauge.
As such our completed Control Procedures paragraph 4.0 B * shall read:

As we have secured an NRC License # _____ clearance need not be
obtained for entry to non-agreement states.

Please see the attached Control Procedures.

Very truly yours,

ITL, Inc.


Jules D. Reese, P.E.
President

JDR:jm
Attachment

Independent Testing Laboratories Control Procedures for Radioactive Materials

1.0 General

On _____, the State of Maryland issued a radioactive materials license to Independent Testing Laboratories (ITL) authorizing the company to use radioactive materials in Troxler 3411B moisture density gauges. That license is Appendix A of these procedures. In order to maintain this authorization the Radiation Safety Officer must:

- A. Perform all activities within the terms and conditions of the license.
- B. Become familiar with Maryland regulations 10.14.02 covering radiation protection and control all company activities to meet these requirements.
- C. Insure the operation of the nuclear moisture density gauge as required by its instructions manual published by the manufacturer.
- D. Carry out all provisions to these Independent Testing Laboratories' Control Procedures for radioactive materials.

2.0 Personnel Assignment and Training

- A. Only authorized ITL personnel may use, transport or handle the nuclear moisture density gauges. The Radiation Safety Officer may authorize an employee to use a device only when that employee has been properly trained in radiological safety and gauge operation and when a film badge has been issued in the employee's name.
- B. The Radiation Safety Officer must have had formal training or an equivalent course taught by a Nuclear Engineer. Authorized users must receive the same scope of training from Troxler Electronics Laboratories or a Radiation Safety Officer approved by the State of Maryland to conduct such training (such as William D. Ochs, Froehling & Robertson, Baltimore and G. Dennis Hall, ATEC Associates, Columbia, Maryland).

As of the date of issue of these procedures the authorized users have received training.

3.0 Radioactivity Exposure Control

- A. A film badge will be assigned by number to each individual for his/her exclusive use while authorized to use the nuclear moisture density gauge. This badge can never be assigned to another person, except when the company manufacturing and processing the badge is changed.
- B. The Radiation Safety Officer must maintain a bound log in which every use of the gauge is recorded including at least the following information:
 - 1) Name of authorized user
 - 2) Badge #
 - 3) Date and time gauge was removed from isotope storage area
 - 4) Date and time gauge was returned to isotope storage area
 - 5) Project name gauge will be used on
- C. At the end of each monthly period new film badges are issued and all badges in use at the time including one control badge will be returned to an authorized agency for evaluation.

When the yearly exposure report of each authorized individual is received from the authorized agency, the forms will be maintained in a permanent file and a copy given to the appropriate individual. The individual will sign the original to indicate receipt of the records. If the individual has left our employ the report will be sent to the last known address by registered mail, return receipt requested.

4.0 Receipt, Transfer, and Disposal of Radioactive Material

- A. Record in a permanent file or log book information concerning the shipment of the radioactive material to a licensed firm for service, calibration, or disposal and the receipt of the material when it is returned.
- B. *
- C. At anytime it is deemed necessary to dispose of license material it will be returned to the factory for disposition or sold as an instrument to another licensed user. If the instrument is damaged beyond repair the source will be transferred to an approved disposal facility as provided by 10CFR20.301 in State regulations D16.301.

5.0 Emergency Procedures

- A. In the event of physical damage to a gauge an exclusionary zone will be established with a radius of 50 feet around the gauge. All vehicles and personnel in this exclusionary zone must be stopped and remain in the area until the extent of the contamination hazard (if any) is determined.
- B. Someone outside the exclusionary zone will be instructed to contact the Radiological Safety Officer. Who will in turn travel to the accident scene to assess the radiological hazard.
- C. If examination of the instrument source indicates damage to the source including fracture of the weld, the Radiological Safety Officer will notify the appropriate state agencies and Troxler Electronics Laboratories.
- D. All vehicles and personnel in the exclusionary zone will remain until the arrival of the appropriate state authorities in the event of source leak or separation (real or suspected).

6.0 Storage

Anytime that the nuclear moisture density gauges are not in use they will be stored in the locked cabinet at 14650 Southlawn Lane, Suite 4, Rockville, Maryland 20852-1317 or in an approved mobile storage facility. The mobile storage facility shall consist of a locked plywood cabinet with an interior welded steel frame which will be pad locked or otherwise secured to the bed of a pick-up truck. These interior locks or securing points (2) will not be accessible with the cabinet closed. The 3/4" plywood will be bolted to the steel frame using carriage bolts (nuts inside). The door has to be welded to the steel frame. The door hinges will be internally welded to the steel frame. See the attached sketches for the storage cabinet details. The cabinet will hold only 1 gauge.

The mobile storage facility will only be used at remote job sites where travel time to and from the job prohibits daily return to the Rockville facility. The pick-up truck containing the cabinet and nuclear density gauge will not be left unattended at any job site. As the pick-up truck will be the sole vehicle for transportation of the inspector and his equipment the truck will be parked over night at his motel or other accommodations when at remote job site.

7.0 Maintenance of Gauges

Nuclear soil density gauges will be maintained in proper working order and checked for normal maintenance by the Radiation Safety Officer periodically. All problems related to the use of a gauge will be reported to the Radiation Safety Officer in writing within 24 hours by all authorized users. At no time will the radiation source be removed from the source holder.

8.0 Leak Testing

At the end of each 6 month period the gauges shall be wipe tested by the Radiological Safety Officer or a licensed consultant using an approved leak test kit. The wipe test will then be sent to a licensed consultant for evaluation. The results of these leak tests will be maintained in a permanent file.

9.0 Liasson with State Officials

At anytime a change is made or anticipated in a condition stated in the license even a change of phone number or mailing address, promptly notify the State of Maryland at the following address:

Maryland Department of Health and Mental Hygiene
Division of Radiological Control
201 West Preston Street
Baltimore, Maryland 21201

Attention: Mr. Thomas Ferguson

BETWEEN: William O. Miller, Chief
License Fee Management Branch
Office of Administration

John E. Glenn, Chief
Nuclear Materials Section B
Division of Engineering and
Technical Programs

LICENSE FEE TRANSMITTAL

A. REGION I

1. APPLICATION ATTACHED

Applicant/Licensee: Independent Testing Laboratories, Inc

Application Dated: 6/10/85

Control No.: 03959

License No.: New

2. FEE ATTACHED

Amount: \$230.00

Check No.: 222

3. COMMENTS

Signed Brenda Plotchek

Date 6/14/85

B. LICENSE FEE MANAGEMENT BRANCH

1. Fee Category and Amount: \$230 - 3P

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

Amendment _____

Renewal _____

License ☒ _____

Signed B Jackson

Date 6/27/85

ROCKVILLE, MD 20850

222

7-1/520 005

PAY TO THE
ORDER OF

PAY TO THE ORDER OF NUCLEAR REGULATORY Commission

\$ 230.00

ONLY TWO HUNDRED THIRTY & NINE/100

DOLLARS

Application Fee - Byproduct material license 230

230 —

IN PAYMENT OF THE ABOVE INVOICES.

Robert E. Tolley
Milton Dale

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