



E. I. DU PONT DE NEMOURS & COMPANY  
INCORPORATED

GLENOLDEN LABORATORY  
GLENOLDEN, PENNSYLVANIA 19036

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PHARMACEUTICAL  
BIOMEDICAL PRODUCTS DEPARTMENT

April 14, 1987

Dr. Josephine Piccone  
Material Licensing Branch  
U.S. Nuclear Regulatory Commission  
Region 1  
631 Park Avenue  
King of Prussia, PA 19406

Dear Dr. Piccone:

Mail Control Number 106331

Per our telephone conversation of April 10, 1987, we wish to make the following modifications to our pending application for renewal of our broad scope materials license no. 07-00455-37.

1. Our request for permission to hold radioactive material for disposal by decay is hereby amended to include only isotopes having half-lives less than 100 days and the retention time will be not less than ten half-lives.
2. The waste storage area will be designated a Strictly Controlled Area and will be surveyed monthly.
3. In support of our request to allow greater than exempt quantities of isotopes in Controlled Areas (but not Strictly Controlled Areas) to be left unattended for brief periods of time during normal working hours without locking them up, please consider the following:
  - a. Site security is maintained 24-hours/day by a security guard service. Access to the site is permitted only at constantly attended locations, the front Reception Desk and/or a side Shipping and Receiving Area. All employees carry identification cards while all visitors are required to sign in and out and display a visible visitors pass. Casual visitors are escorted at all times.

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07-00455-37 PDR

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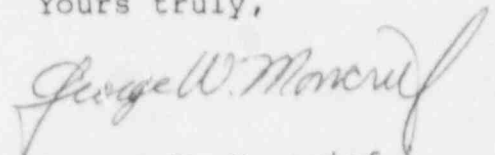
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All other building exits are alarmed and the entire property is otherwise fenced-in with high cyclone fencing and locked gates.

- b. All non-casual (un-escorted) ancillary personnel such as contract guards, contract janitors, temporary laboratory personnel, and maintenance and clerical employees will receive training on how to recognize Controlled Area, Strictly Controlled Area, and Radioactive Material signs and will be instructed not to move, remove or otherwise come in contact with radioactive material.
- 4. Our proposed procedures for receiving and opening packages are hereby amended to include a survey meter check of all packages to verify that external exposure does not exceed the level stated on the package label.
- 5. Our proposal to calibrate survey meters in-house is hereby withdrawn and is substituted with a request for annual quantitative calibration by Applied Health Physics, or equivalent, of only those meters specifically listed on the application while permitting other meters to be qualitatively calibrated.

Thank you for your helpful comments. If you have any additional questions or comments, please feel free to call.

Yours truly,



George W. Moncrief  
Radiation Protection  
Officer

GWM/ds

LICENSE NO. 07-00455-37  
DOCKET NO. 30-19346  
CONTROL NO. 106331

(215) 237-7735

NAME E. I. DU PONT DE NEMOURS & CO., INC  
ATTN: GEORGE W. MONCRIEF, RSO  
ADDRESS 1007 MARKET STREET  
WILMINGTON, DE 19898-

GENTLEMAN,

THIS IS TO CONFIRM OUR TELEPHONE CONVERSATION ON April 19, 1987  
WITH George Moncrief IN WHICH WE DISCUSSED THE INFORMATION  
WE NEED TO CONTINUE REVIEW OF YOUR APPLICATION DATED 9/23/86....

THE ITEMS SPECIFIED BELOW ARE THOSE WE DISCUSSED.

1. *Approval to hold waste for decay; if  $T_{1/2}$  is  $< 100$  days but must hold for 10  $T_{1/2}$ 's and survey before disposal.*
2. *To approve leaving controlled areas unlocked during day - confirm all persons are aware of meaning of signs and labels (in training - "auxiliary personnel" and there is no public access to areas without prior security pass.*
3. *Receipt of pkgs must include safe opening procedure for all packages. It appears that external levels are not checked on any packages or packing materials*
4. *see next page*

IF WE DO NOT RECEIVE A REPLY FROM YOU WITHIN 30 CALENDAR DAYS

FROM THE DATE OF THIS LETTER, IT MAY BE NECESSARY TO DENY  
YOUR APPLICATION FOR LICENSE RENEWAL AND TO TERMINATE YOUR  
LICENSE. THIS ACTION WOULD REQUIRE YOU TO DIVEST YOURSELF  
OF ALL LICENSED MATERIAL IN YOUR POSSESSION.

SINCERELY,

NUCLEAR MATERIALS SAFETY SECTION  
NUCLEAR MATERIALS SAFETY AND SAFEGUARDS BRANCH

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CONCURRENCES:

Piccone-----

4. Waste storage areas - controlled or strictly controlled survey? remote storage area?
5. Survey Meter Calibration: In-house calibration source not adequate: minimum 85mCi  $\approx$  30 mR/hr @ 100cm.  
- Electronic calibrations alone are not acceptable