

March 20, 1987

Dr. John Glenn
U. S. NUCLEAR REGULATORY COMMISSION
631 Park Avenue
King of Prussia, PA 19406

Log	<i>Apr. 2</i>
Remitter	
Check No.	<i>2094</i>
Amount	<i>\$ 120</i>
Fee Category	<i>(3N) 3P</i>
Type of Fee	<i>Amendment</i>
Date Check Rec'd.	<i>4/6/87</i>
Date Completed	<i>4/6/87</i>
By:	<i>S. Kimberley</i>

37-21226-01

Subject: Amendment to Materials License 030-20043

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Dear Dr. Glenn:

As discussed in our January 26th meeting, we wish to amend the subject Materials License. Additionally, we wish to consolidate key aspects of the various statements, representations and procedures contained in documents and enclosures provided earlier and listed in paragraph 17 of Amendment 06 to the subject Materials License.

Except as noted below, the above-mentioned documents and enclosures still apply.

A. Relationship with Laboratory Prof. Dr. Berthold (LABE)

Our company is the authorized United States representative for LABE. As such, we replace Swank Metacon as previously stated in their letter of November 12, 1982.

Please refer to Attachment I, for LABE's confirmation.

Also, please revise the license to show our current address.

B. Ownership

In our February 21, 1985 letter, the NRC was informed that our company is a joint venture between Laboratory Prof. Dr. Berthold (LABE) and Wilder Deem Associates, Inc. For your further information, two individual members of Wilder Deem Associates personally own the significant shares in the Company:

Duane Wilder, Chairman
George M. Smith, Jr., President

Also, James Welsh is no longer a full-time employee. Mr. Welsh now acts as a consultant in radiation training and related technical activity. His name continues on our Materials License, paragraph 11.

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C. Other Companies

The various predecessor and associated companies previously mentioned, are no longer involved in the Materials License, including Swank Metacon Systems Company, Metacon Systems Company, and Berthold Instruments, Inc.

D. Radiation Safety Officer

William Kausek has been appointed as Radiation Safety Officer. He has completed our training program for use of licensed materials, as outlined in Amendment 6, paragraph 11.

Please refer to Attachments II and III outlining his formal training from LABE and Applied Health Physics, Inc., respectively. (For your reference Applied Health Physics' address is 2986 Industrial Blvd., Bethel Park, PA 15102, and telephone number is 412/563-2242.)

E. Revised Procedures and Administrative Guidelines

Attached as Attachments IV through XII, are several revisions to certain practices now in place. Please refer to our letters of February 18 and February 25, 1985.

Significant changes which may be less restrictive than prior programs are:

- 1) Attachment V: See paragraph V. We believe that technical staff of General Licensees, trained by Berthold, are qualified to perform wipe tests and shutter operation tests.
- 2) Attachment IV: Nuclear devices should be "received" by people trained in the required procedures, in addition to those people named in the license. Our original program (see our letter of February 19, 1985) was unnecessarily restrictive in this regard, allowing only fully trained radiation technicians to administer shipping and receiving of nuclear devices.
- 3) Attachment VI: See Equipment Required - a). "Audible" pocket dosimeters are unnecessary, since survey equipment described in b) are audible.

See Procedure - e). Five-Point surface checks are sufficient. Also, Six-Point surface checks are frequently impractical.

- 4) Attachment VIII: Training for customer Specific Licensees as provided by the company should be available, but not required. Training is their responsibility as a Specific Licensee. Additionally, "safety" training as listed in the "Customer Training" Attachment to our February 19, 1985 letter should not be required.

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- 5) Attachment IX: Under Equipment for Replacing Sources and in the procedure section, surgical gloves are eliminated as impractical and unnecessary. Also, tongs will be used where and as practical.

Under note f) on page 2, all mention of source strength is eliminated, since activity ranges are covered in our various material licenses.

Other changes are for clarity, or amplification.

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We continue to refer to previously submitted documents and enclosures for supporting detail. Repeating the list in paragraph 17 Amendment No. 06 of the Materials License:

- A. Application dated November 12, 1982
- B. Letter with attachment dated December 10, 1982
- C. Letter dated December 16, 1982
- D. Letter dated January 28, 1983
- E. Letter dated April 27, 1983
- F. Letter dated July 14, 1983
- G. Letter dated November 3, 1983
- H. Letter dated July 16, 1984
- I. Letter dated August 13, 1984
- J. Letter dated February 18, 1985
- K. Letter dated February 21, 1985
- L. Letter dated February 25,
- M. Letter dated March 11, 1985
- N. Letter dated April 29, 1985
- O. Letter dated August 15, 1985
- P. Letter dated December 2, 1985
- Q. Letter dated May 19, 1986

Please process this application for amendment. Our check for \$120 is enclosed. Should you have questions, please call me or Bill Kausek at 412/741-1273.

Sincerely yours,

BERTHO'D SYSTEMS, INC.

G. M. Smith, Jr.
President

GMS/is

Attachments

cc: Bill Kausek/RSO

Attachments Supporting Our March 13, 1987 Letter

- I. Letter from Laboratorium Prof. Dr. Berthold, dated March 11, 1987
- II. Letter from laboratorium Prof. Dr. Berthold, dated March 12, 1987
- III. Applied Health Physics' RSO Course Outline, for William Kausek
- IV. Procedure for Receiving Shipments of Nuclear Devices from Germany or Returns from Customers.
- V. Labeling of Devices Designed for General Licenses.
- VI. General Procedure for Shipping Nuclear Devices.
- VII. Additional Procedure for Shipping Nuclear Devices to General Licensees.
- VIII. Customer Training
- IX. Procedure for Replacing Source at the Customer's Facility.
- X. Procedure for Wipe Testing Rod Sources.
- XI. Training of Berthold Personnel in United States.
- XII. Guide for Receipt Under a General License.
- XIII. Guide for Receipt Under a Specific License.