

GENERAL DISCOUNT CORPORATION

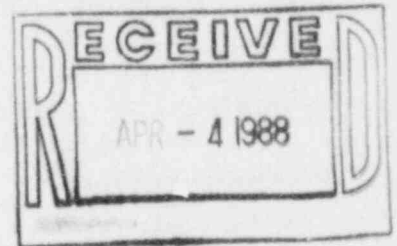
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March 23 1988

Mr. William L. Fisher, Chief
United States
Nuclear Regulatory Commission
Region IV
611 Ryan Plaza Dr.
Suite 1000
Arlington, Texas 76011



Re: Cesium 137 sealed sources for industrial pipe gauges

Dear Mr. Fisher;

This refers to your NOTICE OF VIOLATION dated March 16 1988. I discussed the radioactive materials with Mr. Spitzberg on the telephone March 7, 1988 and assured him that General Discount Corporation had no intention of retaining the radioactive materials. I contacted R/A Services, Inc of Odessa, Texas regarding the transfer of the materials to HANCO, International The purchasers of the equipment. R/A Services representative was at the General Discount yard by 9:30 AM March 8, 1988 to Transfer the sources. The sources were leak wipe tested, visually inspected, locked, marked, surveyed and packaged for shipment to HANCO, International in Midland, Texas. The R/A Services representative had spoken with Mr. Spitzberg and Mr. Charles Cain regarding the sources on March 7 1988 prior to his arrival in Oklahoma City. I am forwarding copies of HANCO, International's Texas Radioactive Materials License along with that of R/A Services, Inc.. HANCO, International received the sources on March 9, 1988 at there Midland, Texas Yard.

If there are any questions contact me or Mr. Hicks at R/A Services, Inc. (915) 563-4127 or Mr. Hanlon at HANCO, International (915) 563-5843.

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REG4 LIC30

PDR

IC-88/558

Respectfully,

Doyle O. Primm
Sales Agent

IC-07
11



TEXAS DEPARTMENT OF HEALTH
RADIOACTIVE MATERIAL LICENSE

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03188

Pursuant to the Texas Radiation Control Act and Texas Department of Health regulations on radiation, and in reliance on statements and representations heretofore made by the licensee, a license is hereby issued authorizing the licensee to receive, acquire, possess and transfer radioactive material listed below; and to use such radioactive material for the purpose(s) and at the place(s) designated below. This license is subject to all applicable rules, regulations and orders of the Texas Department of Health now or hereafter in effect and to any conditions specified below.

<p>LICENSEE</p> <p>1. Name R/A Services, Inc. ADBA Regal Technical Service Attn: Mr. Delbert W. Hicks</p> <p>2. Address P. O. Box 7345 Odessa, Texas 79762</p>		<p>This license issued pursuant to and in accordance with</p> <p><input type="checkbox"/> APPLICATION <input checked="" type="checkbox"/> LETTER <input type="checkbox"/></p> <p>Dated: October 8, 1987</p> <p>Signed By: Delbert Hicks</p> <p>3. License Number L03010</p> <p>Amendment Number 23</p> <p>PREVIOUS AMENDMENTS ARE VOID</p> <p>4. Expiration Date May 31, 1991</p>	
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RADIOACTIVE MATERIAL AUTHORIZED			
5. Radioisotope	6. Form of Material	7. Maximum Activity*	8. Authorized Use
A. Co-60	A. Metallic beads.	A. 600 beads of 0.5 microcuries each.	A. Distribution to authorized specifically licensed recipients.
B. I-131	B. Any	B. 3 Ci.	B. Processing and distribution as tracer material to authorized specifically licensed recipients.
C. Ir-192	C. Any	C. 10 Ci.	C. Processing and distribution as tracer material to authorized specifically licensed recipients.

☒ CONTINUED ON PAGE 2, IF CHECKED.

CONDITIONS

9. Unless otherwise specified, radioactive material shall be stored only at:

Sub-site Number	Location
000	Midland County - 9407 County Road 128 West
001 TERMINATED	Midland County - 1410 County Road 132 West

10. Unless otherwise specified, radioactive material shall be used at 9407 County Road 128 West in Midland County, Texas and at temporary job sites throughout Texas.



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RADIOACTIVE MATERIAL LICENSE

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Supplementary Sheet

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CONTINUED:

5. Radio-isotope	6. Form of Material	7. Maximum Activity	8. Authorized Use
D. Cs-137	D. Sealed source (GN Model CSV).	D. 1 source of 300 mCi.	D. Survey instrument calibration using Gulf Nuclear Model IC-51 calibrator.
E. Cs-137	E. Sealed sources (3M Model 4F6S or 4F6H or GN Model CSV).	E. 37 sources of 1.5 Ci. each.	E. Storage only in NDT Systems, Inc. Model 13640 or 13640B source shields.
F. Au-198	F. Any	F. 10 Ci.	F. Processing and distribution as tracer material to authorized specifically licensed recipients.
G. Sc-46	G. Any	G. 5 Ci.	G. Processing and distribution as tracer material to authorized specifically licensed recipients.
H. Am-241	H. Sealed source (GN Model 71-1, GI Model NB[HP]).	H. 1 source of 5 Ci.	H. Neutron source for storage only.
I. Cs-137	I. Sealed source.	I. 1 source of 2 Ci.	I. Storage only.
J. Ag-110m	J. Any	J. 3 Ci.	J. Processing and distribution as tracer material to authorized specifically licensed recipients.

CONTINUED ON PAGE 3



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RADIOACTIVE MATERIAL LICENSE

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Supplementary Sheet

LICENSE NUMBER	AMENDMENT NUMBER
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CONTINUED:

5. Radio-isotope	6. Form of Material	7. Maximum Activity	8. Authorized Use
K. Zr-95	K. Any	K. 5 Ci.	K. Processing and distribution as tracer material to authorized specifically licensed recipients.
L. Nb-95	L. Any	L. 5 Ci.	L. Processing and distribution as tracer material to authorized specifically licensed recipients.
M. Tb-160	M. Any	M. 5 Ci.	M. Processing and distribution as tracer material to authorized specifically licensed recipients.
N. Sb-124	N. Any	N. 5 Ci.	N. Processing and distribution as tracer material to authorized specifically licensed recipients.
O. Co-60	O. Any	O. 1 Ci.	O. Processing and distribution as tracer material to authorized specifically licensed recipients.
P. Kr-85	P. Any	P. 6 Ci.	P. Processing and distribution as tracer material to authorized specifically licensed recipients.
Q. Br-82	Q. Any	Q. 6 Ci.	Q. Processing and distribution as tracer material to authorized specifically licensed recipients.

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Supplementary Sheet

LICENSE NUMBER	AMENDMENT NUMBER
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CONTINUED:

5. Radio-isotope	6. Form of Material	7. Maximum Activity	8. Authorized Use
R. Xe-133	R. Any	R. 6 Ci.	R. Processing and distribution as tracer material to authorized specifically licensed recipients.
S. H-3	S. Any	S. 500 Ci. No single unit quantity to exceed 20 Ci.	S. Receipt, repackaging and distribution to authorized specifically licensed recipients.
T. Co-57	T. Any	T. 5 Ci.	T. Processing and distribution as tracer material to authorized specifically licensed recipients.
U. Co-58	U. Any	U. 5 Ci.	U. Receipt, repackaging and distribution as tracer material to authorized specifically licensed recipients.
V. S-35	V. Any	V. 500 Ci.	V. Receipt, repackaging and distribution to authorized specifically licensed recipients.
W. Sr-90	W. Any	W. 500 Ci.	W. Receipt, repackaging and distribution to authorized specifically licensed recipients.
X. P-32	X. Any	X. 500 Ci.	X. Receipt, repackaging and distribution to authorized specifically licensed recipients.

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Supplementary Sheet

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CONTINUED:

Y. Pm-147	Y. Any	Y. 500 Ci.	Y. Receipt, repackaging and distribution to authorized specifically licensed recipients.
Z. Sr-85	Z. Any	Z. 5 Ci.	Z. Processing and distribution as tracer material to authorized specifically licensed recipients.
AA. Zn-65	AA. Any	AA. 5 Ci.	AA. Processing and distribution as tracer material to authorized specifically licensed recipients.
AB. Mo-99	AB. Any	AB. 20 Ci.	AB. Processing and distribution as tracer material to authorized specifically licensed recipients.
AC. Cr-51	AC. Any	AC. 10 Ci.	AC. Processing and distribution as tracer material to authorized specifically licensed recipients.
AD. Fe-59	AD. Any	AD. 1 Ci.	AD. Processing and distribution as tracer material to authorized specifically licensed recipients.

CONDITIONS CONTINUED:

11. Radioactive material shall be used only by Delbert Hicks, William Kester and/or John Ames.
12. The individual designated to perform the functions of Radiation Safety Officer for activities covered by this license is Delbert W. Hicks, II.

CONDITIONS CONTINUED ON PAGE 6



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RADIOACTIVE MATERIAL LICENSE

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Supplementary Sheet

LICENSE NUMBER	AMENDMENT NUMBER
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CONDITIONS CONTINUED:

13. Radiation survey instruments shall be calibrated at intervals not to exceed 3 months by persons licensed by the Agency, another Agreement State, or by the U.S. Nuclear Regulatory Commission.
14. Sealed sources containing radioactive material shall not be opened.
15. Sealed sources of radioactive material, Nickel 63 foil, and/or plated alpha emitting sources shall be tested for leakage and/or contamination in accordance with the provisions of Texas Regulations for Control of Radiation 11.7.
16. The licensee shall not transfer radioactive material to other persons until it is verified that the recipient is authorized to possess the type and amount of material to be transferred.
17. The licensee shall maintain records for inspection by the Agency of weekly radiation surveys and wipe surveys. Contamination in all areas of the facility, except for the hot lab, shall be kept below 1000 dpm of removable contamination per 100 square centimeters of area wiped.
18. The licensee shall maintain records for inspection by the Agency of monthly thyroid checks. The thyroid check shall be made with a sodium iodide detector probe placed over the thyroid area in accordance with procedures outlined in letters dated May 5, 1981 and May 15, 1981.
19. The licensee shall make and record radiation surveys on the downwind side of his facility and take air samples at the point of exhaust to the atmosphere once each month.
20. Once each calendar quarter the licensee shall collect off-site soil samples (at least one from each side of the facility and from any drainages which carry runoff from the site) and have them analyzed for contamination in terms of microcuries per gram of soil to determine the extent of environmental contamination. When circumstances prohibit off-site sample collection, the licensee shall collect the sample at the perimeter inside the fence boundary. The values for each soil sample shall be compared to limits in Column 2 of Table II of the Texas Regulations for Control of Radiation (TRCR) Appendix 21-A (for soil, read microcuries/gram for this column). If the soil samples indicate concentrations in excess of regulatory limits, it shall be reported to the Agency in accordance with TRCR 21.403 or 21.405.

CONDITIONS CONTINUED ON PAGE 7



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CONDITIONS CONTINUED:

21. The licensee shall change the absolute filters on the fume hood filtration system when air sampling indicates concentrations, at the absolute filter, greater than 75 percent of the values in TRCR Appendix 21-A, Table II.
22. The licensee is authorized to dispose of his own generated wastes to the sanitary landfill provided:
 - A. Wastes shall be separated by isotope.
 - B. When the storage container is filled, it shall be sealed and dated.
 - C. Sealed containers shall be stored for ten(10) half-lives of the isotope contained or two years, which ever is shorter.
 - D. Prior to disposal, all radioactive labels shall be removed.
 - E. Prior to disposal, a survey, in a low background area, shall be conducted and recorded. Records shall be maintained for inspection by the Agency. Radiation levels shall be less than twice background levels. If radiation levels are more than twice background, the licensee shall retain the waste for one additional half-life.
23. Individuals involved in operations which utilize, during any 24 hour period, more than 50 millicuries of I-125 and/or I-131 or unvented laboratory operations involving 1 mCi. of I-125 and/or I-131 in a noncontained form shall have bioassays performed within one week or if the use of I-125 and/or I-131 is on a continual basis, bioassays shall be performed once every two weeks. Records of the bioassays shall be maintained for inspection by the Agency and the action points listed below shall be observed.
 - A. Whenever the thyroid burden at the time of measurement exceeds 0.12 microcuries of I-125 or 0.04 microcuries of I-131, the following actions shall be taken:
 - (1) An investigation of the operations involved, including ventilation surveys shall be carried out to determine the causes of exposure and to evaluate the potential for further exposures.
 - (2) If the investigation indicates that further work in the area might result in exposure of a worker to concentrations that are excessive, the licensee shall restrict the worker from further exposure until the source of exposure is discovered and corrected.



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CONDITIONS CONTINUED:

23. A. (3) Corrective actions that will eliminate or lower the potential for further exposures shall be implemented.
- (4) A repeat bioassay shall be taken within 1 week of the previous measurement in order to confirm the effectiveness of the corrective action taken or to verify internal radioiodines present.
- (5) Reports or notification shall be provided as required by TRCR Sections 21.405 and 21.408.
- B. If the thyroid burden at any time exceeds 0.5 microcuries of I-125 or 0.14 microcuries of I-131, the following actions shall be taken:
- (1) Prevent the individual from any further handling of I-125 or I-131 until the thyroid burden is below the above limits.
- (2) Carry out all steps described above.
- (3) As soon as possible, refer the case to appropriate medical consultation for recommendations regarding therapeutic procedures that may be carried out to accelerate removal of radioactive iodine from the body. This should be done within 2-3 hours after exposure when the time of exposure is known so that any prescribed thyroid blocking agent would be effective.
- (4) Carry out repeated measurements at approximately 1-week intervals at least until the thyroid burden is less than 0.12 microcuries of I-125 or 0.04 microcuries of I-131.
24. In accordance with letter dated February 25, 1985 sealed sources stored at the licensee's facility located at 9407 County Road 128 in Midland County, shall be exempt from Condition 15 and Texas Regulations for Control of Radiation 11.7 as long as they are being stored at this facility, provided that each source is leak tested within six months prior to being used or transferred.
25. The licensee is authorized to perform the service of survey instrument calibration in accordance with procedures dated April 1986. The individuals authorized to perform this service are listed in Condition 11.
26. The licensee is authorized to perform tests for leakage and/or contamination at customer sites throughout Texas and to distribute their leak/wipe test kit to customers for the licensee's subsequent analysis. Such tests shall be capable of detecting 0.005 microcuries of contamination on the test sample and the results of such tests shall be provided to the customer in terms of microcuries.

CONDITIONS CONTINUED ON PAGE 9



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L03010	23

CONDITIONS CONTINUED:

27. A. Hydrogen 3 shall not be used in such a manner as to cause any individual to receive a radiation exposure such that urinary excretion rates exceed 28 microcuries of Hydrogen 3 per liter when averaged over a calendar quarter.
- B. Urinalysis shall be performed within one week following a single operation on all individuals who work in the restricted areas of facilities in which Hydrogen 3 is used.
- C. A report of an average concentration in excess of the limit specified in (A) above for any individual shall be filed, in writing, within thirty (30) days of the end of the calendar quarter with the Agency. The report shall contain the results of all urinalyses for the individual during the calendar quarter, the cause of the excessive concentrations, and the corrective steps taken or planned to assure against a recurrence.
- D. Any single urinalysis which discloses a concentration of greater than 50 microcuries per liter shall be reported, in writing, within seven (7) days of the licensee's receipt of the results.
28. The licensee is authorized to conduct a radiation safety course for industrial radiographers in accordance with provisions of Part 31, "Radiation Safety Requirements for Industrial Radiographic Operations", of the Texas Regulations for Control of Radiation. The individual authorized to perform the above training is William L. Kester.
29. The licensee is authorized to conduct a radiation safety course for logging supervisors in accordance with provisions of Part 36, "Radiation Safety Requirements for Wireline Service Operations and Subsurface Tracer Studies", of the Texas Regulations for Control of Radiation. The individual authorized to perform the above training is William L. Kester and/or Delbert W. Hicks II.
30. The licensee is authorized to conduct a radiation safety course for users of radioactive material in accordance with provisions of the Texas Regulations for Control of Radiation. The individual authorized to perform the above training is William L. Kester and/or Delbert W. Hicks II.



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RADIOACTIVE MATERIAL LICENSE

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CONDITIONS CONTINUED:

31. After the completion of each course the licensee shall submit a written report to the Agency containing the following information:
- A. the name and company affiliation of each successful student,
 - B. the student's social security number and final test score, and
 - C. the date of the final day of the course.

This report shall also include the licensee's radioactive material license number.

32. Except as specifically provided otherwise by this license, the licensee shall possess and use the radioactive material authorized by this license in accordance with statements, representations, and procedures contained in the following:

application dated April 2, 1986,
letters dated May 5, 1981, May 15, 1981, February 25, 1985, April 25,
1986, May 29, 1986, August 26, 1986, January 16, 1987,
February 5, 1987, March 2, 1987, March 9, 1987,
May 27, 1987, August 14, 1987 and **October 8, 1987.**

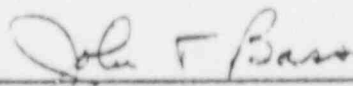
Procedures Manual dated April 1986.

The Texas Regulations for Control of Radiation shall prevail over statements contained in the above documents unless such statements are more restrictive than the regulations.

FRH:sj

FOR THE TEXAS DEPARTMENT OF HEALTH

Date October 28, 1987


Administrator, Licensing Branch

TEXAS DEPARTMENT OF HEALTH
RADIOACTIVE MATERIAL LICENSE

02966

Pursuant to the Texas Radiation Control Act and Texas Department of Health regulations on radiation, and in reliance on statements and representations heretofore made by the licensee, a license is hereby issued authorizing the licensee to receive, acquire, possess and transfer radioactive material listed below; and to use such radioactive material for the purpose(s) and at the place(s) designated below. This license is subject to all applicable rules, regulations and orders of the Texas Department of Health now or hereafter in effect and to any conditions specified below.

LICENSEE

1. Name Hanco International
Attn: Mr. Patrick E. Hanlon
2. Address P. O. Box 6086
Midland, Texas 79711

This license issued pursuant to and in accordance with

☐ APPLICATION ☒ LETTER ☐

Dated: August 26, 1987

Signed By: Patrick E. Hanlon

3. License Number

L04050

Amendment Number

2

PREVIOUS AMENDMENTS ARE VOID

4. Expiration Date

April 30, 1992

RADIOACTIVE MATERIAL AUTHORIZED

5. Radioisotope	6. Form of Material	7. Maximum Activity*	8. Authorized Use
A. Cs-137	A. Sealed sources (3M Model 4F6H or 4F6S or GN Model CSV).	A. 6 source of 1.5 Ci. each.	A. Tube wall thickness measurement in NDT Systems, Inc. Model 13640 or 13640B tube wall caliper.
B. Cs-137	B. Sealed source (3M Model 4D6H or GN Model CSV).	B. 9 sources of 1.5 Ci. each.	B. Pipe wall thickness measurement using William B. Wilson Mfg. Company Model 2202 tube wall caliper.
C. Cs-137	C. Sealed source (3M Model 4D6L or GN Model CSV).	C. 3 sources of 10 Ci. each.	C. Pipe wall thickness measurement using William B. Wilson Mfg. Company Model 2200 tube wall caliper.

☐ CONTINUED ON PAGE 2, IF CHECKED.

CONDITIONS

9. Unless otherwise specified, radioactive material shall be stored and used only at:

Sub-site Number
000

Location
Midland - 507 County Road 1300 South

79711

10. Unless otherwise specified, the authorized place of use is at temporary jobsites throughout Texas.

11. The licensee shall comply with the provisions of Parts 11, 12, 13, 21, 22 and 41 of the Texas Regulations for Control of Radiation.

* Ci-Curies

mCi-Millicuries

u Ci-Microcuries

CONDITIONS CONTINUED ON PAGE 2

FOR THE TEXAS DEPARTMENT OF HEALTH

Date September 4, 1987

Joseph G. Klinger
Administrator, Licensing Branch



TEXAS DEPARTMENT OF HEALTH
RADIOACTIVE MATERIAL LICENSE

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Supplementary Sheet

LICENSE NUMBER	AMENDMENT NUMBER
L04050	2

CONDITIONS CONTINUED:

2. Radioactive material shall be used only by, or under the supervision of, individuals designated by the Radiation Safety Officer, only after each user has successfully completed an Agency accepted training course.
3. Certificates verifying the successful completion of the required training for each user shall be maintained by the licensee for inspection by the Agency.
4. The individual designated to perform the functions of Radiation Safety Officer for activities covered by this license is Patrick E. Hanlon.
5. The licensee shall not open or remove sealed sources containing radioactive material from their respective source holders.
6. Sealed sources of radioactive material, Nickel 63 foil, and/or plated alpha emitting sources shall be tested for leakage and/or contamination in accordance with the provisions of Texas Regulations for Control of Radiation 11.7.
7. Radiation survey instruments shall be calibrated at intervals not to exceed 6 months by persons licensed by the Agency, another Agreement State, or by the U.S. Nuclear Regulatory Commission.
8. Maintenance of devices containing radioactive material (e.g., replacement of labels, rust and corrosion prevention, etc.) and repair and maintenance of source holder mounting brackets shall be performed by or under the supervision of the Radiation Safety Officer.
9. The licensee shall conduct, at intervals not to exceed 6 months, a program of visual inspection and maintenance of all source holders. This inspection shall include, but not be limited to, proper labelling of the source holder, proper functioning of the on-off mechanism, adequate shielding of the radioactive material and integrity of the source mounting mechanism. If any inspection reveals that labelling is inadequate, the on-off mechanism is not functioning properly, source shielding is inadequate or the source mounting mechanism is inadequate; the licensee shall remove the device containing radioactive material from service until repairs have corrected the deficiency. A record of each inspection shall be maintained for inspection by the Agency.

CONDITIONS CONTINUED ON PAGE 3



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RADIOACTIVE MATERIAL LICENSE

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Supplementary Sheet

LICENSE NUMBER	AMENDMENT NUMBER
L04050	2

CONDITIONS CONTINUED:

10. Repair of shutter mechanisms or shielding of devices containing radioactive material and the installation, replacement and disposal of sealed sources used in devices shall be performed only by the manufacturer or other persons specifically authorized to perform such services by the Agency, another Agreement State or the U.S. Nuclear Regulatory Commission.
1. The licensee shall conduct a physical inventory every 6 months to account for all sealed sources received and possessed under the license. The records of the inventories shall be maintained for two years from the date of the inventory for inspection by the Agency and shall include the quantities and the kinds of radioactive material, location of sealed sources, and the date of the inventory.
2. Except as specifically provided otherwise by this license, the licensee shall possess and use the radioactive material authorized by this license in accordance with statements, representations, and procedures contained in the following:

application dated January 30, 1987,
letters dated July 22, 1987 and August 26, 1987,
telegram dated August 11, 1987, and
Radiation Safety Procedures Manual dated January 1987.

The Texas Regulations for Control of Radiation shall prevail over statements contained in the above documents unless such statements are more restrictive than the regulations.

RH:sj

FOR THE TEXAS DEPARTMENT OF HEALTH

September 4, 1987

Date _____

Joseph G. Klinger
Administrator, Licensing Branch