

8-1095-NC-431  
September 27, 1991

United States Nuclear Regulatory Commission  
License Fee & Debt Collection Branch  
P. O. Box 954514  
St. Louis, MO 63195-4514

Re: License #37-08428-01  
Invoice #AM03016-91

**BOEING**

Gentlemen:

We have just received your invoice dated September 10, 1991 billing Boeing Helicopters for \$4,500.00 for the FY 91 license year. Please note that we officially requested termination of the NRC license from the Chief of License Assistance (Region I) on September 12, 1991. (Please see attached) Although we were delinquent with our termination request, I ask that you review the sequence of events that we completed prior to deciding to terminate. As you know, an NRC license is an integral part of any Radiation Health Protection Control Program and as such termination was a significant decision.

In order to insure that we were taking the correct action, Boeing Helicopters investigated the following items:

- o Upon receipt of your July 16, 1991 correspondence, we immediately requested our Corporate Radiation Health Protection Department to review our license and our overall program to determine the feasibility of termination.
- o My Department conducted a survey of various organizations within Boeing Helicopters which may be impacted by termination including Contracts, Spares, Design Engineering and other major programs, Management Offices such as V-22, LH and the MHE program. My Department also conducted a thorough review of the Pennsylvania Department of Environmental Resources (Bureau of Radiological Health) and NRC regulations including telephone conversations with both agencies to determine the effect of the termination.

06-91-474

3-27-97

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September 12, 1991  
8-1092-NJG91-406


Ms. Sheryl Villar,  
Chief, License Assistance Section  
Nuclear Regulatory Commission, Region I  
475 Allendale Road  
King of Prussia, PA 19406

Dear Ms. Villar:

Because of the changes to 10 CFR Parts 170 and 171, Boeing Helicopters reviewed our current and future requirements regarding our NRC license (#37-08428-01). As you know our current license lists Hydrogen 3 and Strontium 90 as being used in self-luminous markers and ice detector probes respectively. Both these items are covered under a general license agreement and do not require coverage under an NRC license (see attachments). Although Boeing Helicopters will continue to use these devices, we see no need to continue the administrative aspects of the license and wish to terminate it. We will, however, continue to follow the other requirements of 10 CFR where and when it applies to us.

If you have any questions, please do not hesitate to call me at 591-7510.

Sincerely,

  
N.J. Garrick, Manager  
Industrial Hygiene

NJG/slv

9703220173

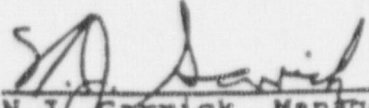
8-1092-NJG91-349  
August 14, 1991

To: W. Morgan 6Y-38  
CC: A. Voss P51-02  
G. Whitsett 6Y-38  
Subject: Boeing Helicopters Nuclear Regulatory Commission  
(NRC) License

As you know, the NRC has recently announced a comprehensive fee schedule for licensees. Boeing Helicopters' license fees will increase significantly under the new schedule and this has prompted a review of our license requirements. Our radioactive material requirements have decreased over the last several years as we have disposed of several stored isotopes and our overall level of activity has declined for radioactive self-luminous markers. We are, therefore, contemplating closing out our current NRC license if general licensing regulations cover our existing requirements.

I am requesting that Corporate Radiation Protection review our current radioactive material program and NRC license and render a opinion on the necessity of keeping the license.

Please call me if you require any additional information.

  
N.J. Garrick, Manager  
Industrial Hygiene

NJG:slv/P51-02/x7510



The Boeing Company

Fax Leader

To: <u>Michael J. Garrick</u>		Fax No. <u>215-591-8013</u>		Fax No. <u>215-591-7514</u>		Fax No. <u>206-393-3060</u>		Fax No. <u>206-393-3055</u>	
Location: <u>PA</u>		City: <u>SEATTLE, WA</u>		State: <u>WA</u>		Zip: <u>98107</u>		Country: <u>USA</u>	
Product: <u>BOEING</u>		Project: <u>P51-02</u>		Task: <u>GEORGE WILTSEY</u>		Date: <u>9-11-91</u>		Page: <u>1</u>	
Comments:		Signature: <input type="checkbox"/>		Initials: <input type="checkbox"/>		Date: <input type="checkbox"/>		Fax No. <input type="checkbox"/>	

September 10, 1991  
4-1210-91R-0583

To: N. J. Garrick P51-02

Subject: Nuclear Regulatory Commission (NRC) License 37-08428-01 and Possibility of Cancelling Same

Reference(s): Memo 8-1092-NJC91-349, N. J. Garrick to W. Morgan, dated August 14, 1991

Referenced memo requested that Components Radiation Health Protection review your current radioactive materials program and assess your NRC licensing requirements. The following information is provided concerning these requirements.

Radioactive materials/devices listed on your current NRC license (37-08428-01) do not require specific licensing authority from the Commission. 10 CFR 31.7 and 31.10 and applicable sections of 10CFR 110 authorize general licensees to possess, use, and export these devices as long as they have been manufactured and initially distributed per specific NRC/Agreement State Licenses. You will be subject to certain reporting requirements (10 CFR 20.301, 20.402 and 20.403) and, of course, shall operate your protection program within the guidelines set forth in OSHA 1910.104, "Control of Radiological Materials."

We understand that you have called Region I and confirmed that no regulatory/financial penalties exist for licensees who cancel specific licenses, but retain the same radioactive materials per existing general licenses published on Part 10 CFR and/or Agreement State regulations.

A quick review of Pennsylvania codes indicates that Chapters 217.43 and 217.47 authorize possession and use of Tritium Markers and for detection devices on a general license. There are also some reporting/transportation requirements listed in your Pennsylvania codes. The reporting requirements should also be considered in case of loss, theft, or incident involving your generally licensed radioactive materials.

William E. Morgan  
William E. Morgan  
Senior Manager  
Radiation Health Protection  
Org. 4-1210 M/S 6Y-38  
Phone (206) 393-3055

George A. Wiltsey  
George A. Wiltsey  
Manager  
Radiation Health Protection  
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GAW:RES