

US NRC REGION 2

404 562 4955

05/17 '00 08:58 NO.635 02/08

NRC FORM 341 (7-1000) U.S. NUCLEAR REGULATORY COMMISSION

REPORT OF PROPOSED ACTIVITIES IN NON-AGREEMENT STATES, AREAS OF EXCLUSIVE FEDERAL JURISDICTION, OR OFFSHORE WATERS

(Please read the instructions before completing this form)

2. TYPE OF REPORT
[X] INITIAL [] REVISION [] CLARIFICATION

1. NAME OF LICENSEE (Person or firm) proposing to conduct the activities described below: Industrial Safety Consulting Services

6. ADDRESS OF LICENSEE (Mailing address or other location where licensee may be contacted): 213 Chelsea Court, Clarksville, TN 37043-4024

4. LICENSEE CONTACT AND TITLE: Scott J. Winters, RSO. 5. TELEPHONE NUMBER: 931-358-0649 6. FACSIMILE NUMBER: 931-358-0649

7. ACTIVITIES TO BE CONDUCTED UNDER THE GENERAL LICENSE GIVEN IN 10 CFR 150.20

- Well Logging, Leak Testing and/or Calibrations, Teletherapy/Irradiator Service, Portable Gauges, Other (Specify) - Service nuclear gauges, Radiography

8. CLIENT NAME, ADDRESS, CITY, COUNTY, STATE, ZIP CODE: Nucor Steel Corp., RR # 2, Box 311, Crawfordsville, IN 47933-9450

9. ACTUAL PHYSICAL ADDRESS OF WORK LOCATION: Crawfordsville Mill, County Road 400 East, Crawfordsville, IN 47933

10. CLIENT TELEPHONE NUMBER: 479-339-9450

11. WORK LOCATION TELEPHONE NUMBER: 479-339-9450

Table with 5 columns: 12. DATES SCHEDULED (5/00 to 12/00), 13. NUMBER OF WORK DAYS (~10), 14. ADD, 15. DELETE, 16. LOCATION REFERENCE NUMBER (000889)

LIST ADDITIONAL WORK SITES ON SEPARATE SHEET(S) TO INCLUDE ALL INFORMATION CONTAINED IN ITEMS 8-16 ABOVE.

17. LIST RADIOACTIVE MATERIAL, WHICH WILL BE POSSESSED, USED, INSTALLED, SERVICED, OR TESTED: FMS - Co 137, 50 Ci; Bx Hold - Co 60, 36 mCi; DMC - Au 241, 1 Ci

Licensee to send clarification when work dates scheduled.

14. AGREEMENT STATE ISSUING LICENSE WHICH AUTHORIZES THE UNDERSIGNED TO CONDUCT ACTIVITIES WHICH ARE THE SAME, EXCEPT FOR LOCATION OF USE, AS SPECIFIED IN ITEM 9 ABOVE.

LICENSE NUMBER: R-63018-H09, STATE: TN, EXPIRATION DATE: 8/31/2009

18. CERTIFICATION (MUST BE COMPLETED BY APPLICANT)

- 1. THE UNDERSIGNED, HEREBY CERTIFY THAT: a. All information in this report is true and complete. b. I have read and understand the provision of the general license 10 CFR 150.20... c. I understand that activities, including storage, conducted in non-Agreement States under general license 10 CFR 150.20 are limited to a total of 180 days in calendar year... d. I understand that I may be inspected by NRC at the above listed work site locations... e. I understand that conduct of any activities not described above, including conduct of activities on sites or locations different from those described above or without NRC authorization, may subject me to enforcement action...

CERTIFYING OFFICER - RSO or Management Representative (Name and Title): Scott J. Winters

SIGNATURE: [Signature]

DATE: 5/17/00

WARNING: False statements in this certificate may be subject to civil and/or criminal penalties. NRC regulations require that submissions to the NRC be complete and accurate in all material respects. 18 U.S.C. Section 1001 makes it a criminal offense to make a willfully false statement or agency of the United States as to any matter within its jurisdiction.

FOR NRC USE ONLY: D. M. Heim, LA/DNMS

SIGNATURE: [Signature]

DATE: 5/17/00, TOTAL USAGE - DAYS TO DATE: 00

SCOTT J. WINTERS
RAMONA B. WINTERS
DBA INDUSTRIAL SAFETY CONSULTING SERVICES
PH: 931-358-0649 FAX: 931-358-0649
213 CHELSEA COURT
CLARKSVILLE, TN 37040-8044

87-570 240
811
574809711

1259

DATE *May 17, 2000*

PAY TO: *U.S. AIRC. Region II*

\$ *1,200.00*

ONE CHECK OF *One thousand two hundred & 00/100*

DEPOSITED BY *[Signature]*



MEMBER *Respectfully Applied*

⑆064103707⑆1259 574809711⑆

IMS Measuring Systems, Inc.
108 Blue Ridge Drive
Cranberry Twp. PA 16066
(Pittsburgh) USA
Tel: 724 776 9586
Fax: 724 776 2700
www.ims-gauges.com

TO: All Customers
FROM: Isotope Measuring Systems, Inc. (IMS Inc.)
DATE: May 1, 2000
SUBJECT: Distribution and Servicing of IMS Sealed Source Devices

Dear Customer:

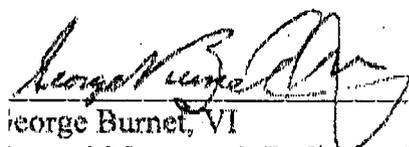
As you may be aware, Isotope Measuring Systems, Inc. is the holder of four Certificates of Registration from the U.S. Nuclear Regulatory Commission: Nos. NR-375-D-101-B (for Model 221 series devices), NR-375-102-S (for Model 5245-03 series devices), NR-375-D-103-S (for 301 series devices), and NR-375-D-104-S (for Model 5321 series devices). We also are the holder of a NRC specific Part 30 License No. 37-28767-01, authorizing us to distribute and service these devices. To the best of our knowledge, no one else possesses Certificates of Registration or a Part 30 License for these devices.

Under NRC regulations, for any entity to distribute or service a sealed source device it is necessary to have an existing Certificates of Registration specifically naming that entity and specifying its functions and responsibilities, and a Part 30 License (or Agreement State License) specific to the sealed source device.

We have not authorized any other company to act under our Certificates of Registration or Part 30 License. This is important because several companies exist with names similar to ours. One of those companies has advised certain of our customers that a company called IMS Systems, Inc. "will assume the role formerly held by IMS Measuring Systems, Inc.". We want to advise you that IMS Systems, Inc. is not authorized to use our Certificates of Registration or Part 30 License, and its employees are not authorized by us to operate under our certificates or license.

You should ask any individual who proposes to distribute to you a sealed source device or to perform service on your sealed source device what NRC or Agreement State License is being utilized. If you are contacted by anyone purporting to represent us or to be acting under our registrations and/or license, please contact us to check on the accuracy of such representation.

Best Regards,


George Burnet, VI
General Manager & Radiation Safety Officer
Isotope Measuring Systems, Inc.
IMS Measuring Systems, Inc.

TENNESSEE DEPARTMENT OF ENVIRONMENT AND CONSERVATION
 DIVISION OF RADIOLOGICAL HEALTH



RADIOACTIVE MATERIAL LICENSE

Pursuant to Tennessee Department of Environment and Conservation Regulations, 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 and regulations of the Tennessee Department of Environment and Conservation and orders of the Division of Radiological Health, now or hereafter in effect and to any conditions specified below.

LICENSEE		3. License number
1. Name	Industrial Safety Consulting Services (ISCS) 213 Chelsea Court Clarksville, Tennessee 37043-4024	R-63018-H09
2. Address		4. Expiration date
		August 31, 2009
		5. File no.
		R-63018

6. Radioactive Material (Element and Mass Number)	8. Chemical and/or physical form	9. Maximum Radioactivity and/or quantity of material which licensee may possess at any one time.
See Supplementary Sheets		

10. Authorized Use

See Supplementary Sheets

CONDITIONS

11. Unless otherwise specified, the authorized place of use is the licensee's address stated in item 2, above.

See Supplementary Sheets

For the Commissioner
 Tennessee Department of Environment and Conservation

Date of Issuance August 2, 1999

By: *Gerald W. Bacon*
 DIVISION OF RADIOLOGICAL HEALTH

Page 1 of 5 Pages

Gerald W. Bacon
 Health Physicist

Form RHS 8-7A
(9-92)

**TENNESSEE DEPARTMENT OF ENVIRONMENT AND CONSERVATION
DIVISION OF RADIOLOGICAL HEALTH**

RADIOACTIVE MATERIAL LICENSE

SUPPLEMENTARY SHEET

Page 2 of 5 PagesLicense Number R-63018-G09

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|--|---|--|
| 6. <u>Radioactive Material (Element and Mass Number)</u> | 8. <u>Chemical and/or Physical Form</u> | 9. <u>Maximum Radioactivity and/or Quantity of Material Which Licensee May Possess at Any One Time</u> |
| A. Any radioactive material | A. See Item 10.A below | A. See Item 10.A below |
| B. Any radioactive material | B. Sealed sources (Manufactured and distributed in accordance with a license issued by the Department, U.S. Nuclear Regulatory Commission, an Agreement State or Licensing State, as appropriate, in accordance with applicable provision for the manufacture and distribution of such radioactive material.) | B. See Item 10.B below |

10. Authorized use

- A. 1. The licensee is authorized to perform tests for leakage and/or contamination upon sealed sources containing these radioactive materials and upon devices which contain sealed sources. The licensee is also authorized to possess and analyze radioactive material contained on test media resulting from these tests and contamination surveys which the licensee may perform. Such waste material will be disposed of in conformance with 1200-2-5-.120 of "State Regulations for Protection Against Radiation".
2. The licensee's possession of special nuclear material is limited to less than 1 gram.
- B. Installation, removal, preparation for transport, relocation, maintenance, repair, and performance of initial radiation survey of gauges or measuring devices that have been manufactured and distributed in accordance with a license issued by the Department, U.S. Nuclear Regulatory Commission, an Agreement State or Licensing State, as appropriate, with applicable provision for the manufacture and distribution of such radioactive material, and listed on the NRC Registry of Sealed Sources and Devices.
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Form RMS 8-7A
(9-92)TENNESSEE DEPARTMENT OF ENVIRONMENT AND CONSERVATION
DIVISION OF RADIOLOGICAL HEALTH

RADIOACTIVE MATERIAL LICENSE

SUPPLEMENTARY SHEET

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License Number R-63018-G09Conditions

11. The licensee shall comply with applicable provisions of 1200-2-4, 1200-2-5, and 1200-2-10 of "State Regulations for Protection Against Radiation".
12. A. The services authorized in Item 10 above shall be performed only by Scott J. Winters.
B. The Radiation Safety Officer for this license is Scott J. Winters.
13. Services authorized in Item 10 shall be performed only at the customer's site (except for analyses of test media which may be performed at licensee's address), in areas not under exclusive Federal jurisdiction, as designated by the pertinent Tennessee licensee authorizing the customer's use and possession of that radioactive material.

Before radioactive material can be used at a temporary job site at any Federal facility, the jurisdictional status of the job site must be determined. If the jurisdictional status is unknown, the Federal agency should be contacted to determine if the job site is under exclusive Federal jurisdiction. A response should be obtained in writing or a record should be made of the name and title of the person at the Federal agency who provided the determination and the date that it was provided. Authorization for use of radioactive materials at job sites under exclusive Federal jurisdiction shall be obtained either by: (1) filing an NRC Form-241 in accordance with 10 CFR 150.20(b), "Recognition of Agreement State Licensees", or (2) by applying for a specific NRC license.

Before radioactive materials can be used at a temporary job site in another State, authorization shall be obtained from the State if it is an Agreement State, or from the NRC for any non-Agreement State, either by filing for reciprocity or applying for a specific license.

14. Tests for leakage and/or contamination shall be capable of detecting 0.005 microcurie of radioactive material on the test sample, or in the case of radium, the escape of radon at the rate of 0.001 microcurie per 24 hours. The customer shall be furnished a report of leak test results in units of microcuries. If a test reveals the presence of removable contamination equivalent to or greater than 0.005 microcurie, or in the case of radium, the escape of radon at the rate of 0.001 microcurie per 24 hours, the customer of the licensee shall be informed of the Department's requirements as follows: "The licensee shall immediately withdraw the sealed source from use and shall cause it to be decontaminated and repaired or to be disposed of in accordance with Department regulations. A report shall be filed within five days of the test with the Division of Radiological Health, Tennessee Department of Environment and Conservation, Third Floor, L & C Annex, 401 Church Street, Nashville, Tennessee 37243-1532, describing the equipment involved, the test results, and the corrective action taken".

Form RRS 8-7A
(9-92)

**TENNESSEE DEPARTMENT OF ENVIRONMENT AND CONSERVATION
DIVISION OF RADIOLOGICAL HEALTH**

RADIOACTIVE MATERIAL LICENSE

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License Number R-63018-G09

15. Shipments of Plutonium by air, regardless of quantity, may only be made in packages the design of which has been specifically approved by the U.S. Nuclear Regulatory Commission for transport of Plutonium by air.
16. The licensee shall maintain complete and accurate records of the receipt and disposal of radioactive material. The licensee shall, for radioactive material no longer useful for any purpose and for any equipment or supplies contaminated with such material for which further use and decontamination is not planned, define those materials as radioactive waste and treat them as such in accordance with the following provisions:
 - A. Radioactive waste material shall not be stored with non-radioactive waste.
 - B. A written record of all radioactive waste material shall be maintained until it has been determined by a suitable survey or radioassay that it has decayed to background levels or until it has been shipped to an authorized recipient in accordance with all applicable regulations. Accountability of radioactive waste material prepared for shipment but not yet shipped from the licensee's premises shall be maintained by the licensee by an internal record system such that the licensee is constantly aware of the material's location and the proposed time of shipment. Individuals who are involved in the shipping of such material and/or the storage of such material prior to shipment, shall be trained in the precautions necessary for such handling and storage.
 - C. For material which has decayed to background levels as determined by radioassay or external level as measured with appropriately calibrated instruments, records shall indicate that the material was determined to be no longer radioactive and will indicate the methods and results of the survey or analysis.
 - D. Shipment records of radioactive waste material shall be maintained and the licensee shall require written confirmation from the authorized recipient of such material that this material has been received.
 - E. All records and written confirmations required by this condition shall be maintained for inspection by the Department.

The requirements for this condition are in addition to any other requirements for the handling and/or disposal of radioactive material contained in this license and "State Regulations for Protection Against Radiation".

**TENNESSEE DEPARTMENT OF ENVIRONMENT AND CONSERVATION
DIVISION OF RADIOLOGICAL HEALTH**

RADIOACTIVE MATERIAL LICENSE

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License Number R-63018-G09

17. No provision of this license relieves the licensee from compliance with other Federal, State and local laws, ordinances, and regulations applicable to the licensee's activities.
18. Except as specifically provided otherwise by this license, the licensee shall possess and use radioactive material described in Items 6, 8, and 9 of this license in accordance with statements, representations, and procedures contained in application dated February 1, 1999, with attachments, and letters dated February 1, 1999, March 8, 1999, with attachments, and July 19, 1999, with attachments.

**Industrial Safety Consulting Services**

Radiological Safety and Engineering Group

**FACSIMILE COVER PAGE**

To: Diane Heim	From: Scott Joseph Winters
Fax #: 14045624955	Fax #: (931) 358-0649
Company: US-NRC, Region II	Tel #: (931) 358-0639
Subject: Reciprocity Request for ISCS	
Sent: 5/17/00 at 2:07:54 PM	Pages: 10 (including cover)

MESSAGE:

Ms. Heim,

I wanted to fax this to you prior to mailing, in case you need me to provide any additional information.

Please confirm upon receipt and review.

Thanks in advance,

Scott
swinters@clarksville.com

attached:

- ISCS letter
- Form 241
- Copy of check 1259
- IMS Letter
- ISCS - TN License

Note: The information contained in this message may be privileged and confidential and protected from disclosure. If the reader of this message is not the intended recipient, or an employee or agent responsible for delivering this message to the intended recipient, you are hereby notified that any dissemination, distribution or copying of this communication is strictly prohibited. If you have received this communication in error, please notify ISCS and destroy all attached documents.

Industrial Safety Consulting Services

213 Chelsea Court
Clarksville, TN 37043
(931) 358-0639, fax# 358-0649

May 17, 2000
**via Facsimile and
US Priority Mail**

Attn: Reciprocity Request
U.S. Nuclear Regulatory Commission, Region II
Sam Nunn Atlanta Federal Center
61 Forsyth Street, S.W., Suite 23T85
Atlanta, GA 30303.8931

Greetings,

This letter is to request reciprocal recognition for radiological safety consulting services within the state of Indiana. I've enclosed my Tennessee radioactive materials license for your review.

Nucor Steel Corporation has requested that ISCS provide radiological support services, including: sealed source leak testing, training, inspection, maintenance and repair of radiation gauges at their Mill in Crawfordsville, Indiana. Previously, ISCS had only provided general consultation services that hadn't required reciprocal authorization.

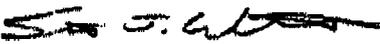
It is our understanding that the former IMS Measuring Systems, Inc. in Cranberry Twp., PA, will no longer provide support for IMS gauges. Therefore, Nucor has retained ISCS to perform on site preventative maintenance and repair of their licensed gauges. ISCS plans to obtain spare parts directly from the manufacturer in Germany.

Please review the attached letter dated May 1, 2000 from Mr. George Burnett. In the letter, Mr. Burnett implies that his company is the only one authorized to service IMS gauges. It is my understanding that ISCS can perform such services in accordance with condition 10 of Tennessee license number R-63018-H09, after obtaining reciprocity from the NRC.

Please provide clarification of service privileges to ensure that Nucor can receive appropriate support of their licensed gauges.

I've enclosed NRC Form 241, along with a check for \$1,200.00. Please advise if additional information is necessary to receive reciprocal recognition by your agency.

Respectfully,



Scott J. Winters, RSO

Attachment: NRC-Form 241
ISCS-TN Lic# R-63018-H09 [5 pages]
IMS letter dated 5/1/00 [1 page]
ISCS Check # 1259, for \$1,200.00

cc: Jeff Jordan, RSO - Crawfordsville Mill

'Only by referral'