



UNITED STATES
NUCLEAR REGULATORY COMMISSION

REGION I
475 ALLENDALE ROAD
KING OF PRUSSIA, PA 19406-1415

August 24, 2000

Docket No. 03019945
Control No. 128549

License No. 37-20584-01

Paul D. Spiegel, P.E.
Director of Construction Services
Valley Forge Laboratories, Inc.
6 Berkeley Road
Devon, PA 19333-1397

SUBJECT: VALLEY FORGE LABORATORIES, INC., ISSUANCE OF LICENSE
AMENDMENT, CONTROL NO. 128549

Dear Mr. Spiegel:

This refers to your license amendment request. Enclosed with this letter is the amended license. Please note that as part of this Amendment, in accordance with 10 CFR 30.36, effective February 15, 1996, the expiration date of your license has been extended by a period of five years. Your new expiration date is stated in Item 4 of the license.

The enclosed amended license (Amendment No. 7) is written in a format that incorporates current U.S. Nuclear Regulatory Commission requirements and policy. Several conditions that appeared in Amendment No. 6 of your license were revised and new conditions were added. Please review the enclosed document carefully and be sure that you understand and fully implement all the conditions incorporated into the amended license. If there are any errors or questions, please notify the U.S. Nuclear Regulatory Commission, Region I Office, Licensing Assistance Team, (610) 337-5093 or 5239, so that we can provide appropriate corrections and answers.

Thank you for your cooperation.

Sincerely,

Original signed by Pamela J. Henderson

Pamela J. Henderson
Senior Health Physicist
Nuclear Materials Safety Branch 2
Division of Nuclear Materials Safety

P. Spiegel
Valley Forge Laboratories, Inc.

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Enclosures:

1. Amendment No. 7
2. 10 CFR Part 30
3. NUREG-1556, Volume 1

cc:

James Regnier, Radiation Safety Officer

DOCUMENT NAME: C:\137-20584-01.128549.08242000.wpd

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| OFFICE | DNMS/RI | N | DNMS/RI | DNMS/RI | | |
| NAME | PHenderson/pjh1 /s/ | | | | | |
| DATE | 08/24/2000 | | | | | |

OFFICIAL RECORD COPY

MATERIALS LICENSE

Pursuant to the Atomic Energy Act of 1954, as amended, the Energy Reorganization Act of 1974 (Public Law 93-438), and Title 10, Code of Federal Regulations, Chapter I, Parts 30, 31, 32, 33, 34, 35, 36, 39, 40, and 70, 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 byproduct, source, and special nuclear material designated below; to use such material for the purpose(s) and at the place(s) designated below; to deliver or transfer such material to persons authorized to receive it in accordance with the regulations of the applicable Part(s). This license shall be deemed to contain the conditions specified in Section 183 of the Atomic Energy Act of 1954, as amended, and is subject to all applicable rules, regulations, and orders of the Nuclear Regulatory Commission now or hereafter in effect and to any conditions specified below.

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| <p>Licensee</p> <p>1. Valley Forge Laboratories, Inc.</p> <p>2. 6 Berkeley Road Devon, Pennsylvania 19333</p> | <p>In accordance with the letter dated August 21, 2000,</p> <p>3. License number 37-20584-01 is amended in its entirety to read as follows:</p> <hr/> <p>4. Expiration date August 31, 2003</p> <hr/> <p>5. Docket No. 030-19945 Reference No.</p> |
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| <p>6. Byproduct, source, and/or special nuclear material</p> <p>A. Cesium 137</p> <p>B. Americium 241</p> | <p>7. Chemical and/or physical form</p> <p>A. Sealed sources (Troxler Drawing No. A-102112, Amersham Model No. CDCW556, IPL Model No. HEG 0058)</p> <p>B. Sealed neutron sources (Troxler Drawing Nos. A-102451, A-102113, Amersham Model No. AMNV.997, IPL Model No. 3021 and 3027)</p> | <p>8. Maximum amount that licensee may possess at any one time under this license</p> <p>A. No single source to exceed the maximum activity specified in the certificate of registration issued by the U.S. Nuclear Regulatory Commission or an Agreement State</p> <p>B. No single source to exceed the maximum activity specified in the certificate of registration issued by the U.S. Nuclear Regulatory Commission or an Agreement State</p> |
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9. Authorized use:

A. and B. For measuring physical properties of materials, in portable gauging devices that have been registered either with U.S. Nuclear Regulatory Commission under 10 CFR 32.210 or with an Agreement State and have been distributed in accordance with a Commission or Agreement State specific license authorizing distribution to persons specifically authorized by an Commission or Agreement State license to receive, possess, and use the devices.

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CONDITIONS

10. Licensed material may be used at the licensee's facilities at 6 Berkeley Road, Devon, Pennsylvania, and at temporary job sites of the licensee anywhere in the United States where the U.S. Nuclear Regulatory Commission maintains jurisdiction for regulating the use of licensed material.
11. A. Licensed material shall be used by, or under the supervision and in the physical presence of individuals who have successfully completed the manufacturer's training program for gauge users and who have been designated by the Radiation Safety Officer. The licensee shall maintain records of individuals designated as users for 3 years following the last use of licensed material by the individual.
- B. The Radiation Safety Officer for this license is James Regnier.
12. A. Sealed sources shall be tested for leakage and/or contamination at intervals not to exceed the intervals specified in the certificate of registration issued by the U.S. Nuclear Regulatory Commission under 10 CFR 32.210 or under equivalent regulations of an Agreement State.
- B. In the absence of a certificate from a transferor indicating that a leak test has been made, within the intervals specified in the certificate of registration issued by the U.S. Nuclear Regulatory Commission under 10 CFR 32.210 or under equivalent regulations of an Agreement State, prior to the transfer, a sealed source received from another person shall not be put into use until tested and the test results received.
- C. Sealed sources need not be tested if they are in storage and are not being used. However, when they are removed from storage for use or transferred to another person, and have not been tested within the required leak test interval, they shall be tested before use or transfer. No sealed source shall be stored for a period of more than 10 years without being tested for leakage and/or contamination.
- D. The leak test shall be capable of detecting the presence of 0.005 microcurie (185 becquerels) of radioactive material on the test sample. If the test reveals the presence of 0.005 microcurie (185 becquerels) or more of removable contamination, a report shall be filed with the U.S. Nuclear Regulatory Commission in accordance with 10 CFR 30.50(c)(2) and the source shall be removed immediately from service and decontaminated, repaired, or disposed of in accordance with Commission regulations.
- E. Tests for leakage and/or contamination, limited to leak test sample collection, shall be performed by the licensee or by other persons specifically licensed by the U.S. Nuclear Regulatory Commission or an Agreement State to perform such services. The licensee is not authorized to perform the analysis; analysis of leak test samples must be performed by persons specifically licensed by the Commission or an Agreement State to perform such services.

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- F. Records of leak test results shall be kept in units of microcuries and shall be maintained for 3 years.
13. Sealed sources or source rods containing licensed material shall not be opened or sources removed or detached from source rods or gauges by the licensee, except as specifically authorized.
 14. The licensee shall conduct a physical inventory every six months, or at other interval approved by the U.S. Nuclear Regulatory Commission, to account for all sealed sources and/or devices received and possessed under the license.
 15. Except for maintaining labeling as required by 10 CFR Part 20 or 71, the licensee shall obtain authorization from the U.S. Nuclear Regulatory Commission before making any changes in the sealed source, device, or source-device combination that would alter the description or specifications as indicated in the respective Registration Certificates issued either by the Commission pursuant to 10 CFR 32.210 or by an Agreement State.
 16. Each portable nuclear gauge shall have a lock or outer locked container designed to prevent unauthorized or accidental removal of the sealed source from its shielded position. The gauge or its container must be locked when in transport, storage or when not under the direct surveillance of an authorized user.
 17. Any cleaning, maintenance, or repair of the gauges that requires detaching the source or source rod from the gauge shall be performed only by the manufacturer or other persons specifically licensed by the U.S. Nuclear Regulatory Commission or an Agreement State to perform such services.
 18.
 - A. If the licensee uses unshielded sealed sources extended more than 3 feet below the surface, the licensee shall use surface casing that extends from the lowest depth to 12 inches above the surface and other appropriate procedures to reduce the probability of the source or probe becoming lodged below the surface. If it is not feasible to extend the casing 12 inches above the surface, the licensee shall implement procedures to ensure that the cased hole is free of obstruction before making measurements.
 - B. If a sealed source or a probe containing sealed sources becomes lodged below the surface and it becomes apparent that efforts to recover the sealed source or probe may not be successful, the licensee shall notify the U.S. Nuclear Regulatory Commission and submit the report required by 10 CFR 30.50(b)(2) and (c). The licensee shall not abandon the sealed source or probe without obtaining the Commission's prior written consent.
 19. The licensee is authorized to transport licensed material in accordance with the provisions of 10 CFR Part 71, "Packaging and Transportation of Radioactive Material."

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20. Except as specifically provided otherwise in this license, the licensee shall conduct its program in accordance with the statements, representations, and procedures contained in the documents including any enclosures, listed below. The U.S. Nuclear Regulatory Commission's regulations shall govern unless the statements, representations and procedures in the licensee's application and correspondence are more restrictive than the regulations.

- A. Application dated December 14, 1992
- B. Letter dated July 7, 1993



For the U.S. Nuclear Regulatory Commission

Date August 24, 2000

By *Original signed by Pamela J. Henderson*
 Pamela J. Henderson
 Nuclear Materials Safety Branch 2
 Division of Nuclear Materials Safety
 Region I
 King of Prussia, Pennsylvania 19406