

January 10, 2001

Region II  
U.S. Nuclear Regulatory Commission  
61 Forsyth Street, SW, Suite 23T85  
Atlanta, GA 30303  
Reciprocity

Dear Sirs,

Please find enclosed a completed but blank NRC Form 241 with the assigned location reference number of 000145. We have submitted by facsimile the completed form for work scheduled for January 8 and 11, 2001. Also enclosed are four copies of our North Carolina Radioactive Materials License and the appropriate reciprocity fee.

The referenced facility on the NRC Form 241 (Carolina Steel at Bristol, Virginia) is the only site we currently will be working at within the NRC jurisdiction. We will be making future clarifications by NRC Form 241 as work continues at this facility.

If additional information is required please contact me at 336/852-0318.

Respectfully,



James E. Buchanan, R.S.O.  
S.K. McBryde, Inc.

Estimated burden per response to comply with this mandatory collection request: 15 minutes. This notification is required so that NRC may schedule inspection of the activities to ensure that they are conducted in accordance with requirements for protection of the public health and safety. Send comments regarding burden estimate to the Records Management Branch (T-6 E6), U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001, or by internet e-mail to bjs1@nrc.gov, and to the Desk Officer, Office of Information and Regulatory Affairs, NEOB-10202, (3150-0013), Office of Management and Budget, Washington, DC 20503. If a means used to impose an information collection does not display a currently valid OMB control number, the NRC may not conduct or sponsor, and a person is not required to respond to, the information collection.

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

*(Please read the instructions before completing this form)*

1. NAME OF LICENSEE <i>(Person or firm proposing to conduct the activities described below)</i> <p style="text-align: center;">S.K. McBryde, Inc.</p>		2. TYPE OF REPORT <input type="checkbox"/> INITIAL <input type="checkbox"/> REVISION <input checked="" type="checkbox"/> CLARIFICATION	
3. ADDRESS OF LICENSEE <i>(Mailing address or other location where licensee may be located)</i> <p style="text-align: center;">P.O. Box 579 Summerfield, North Carolina 27358</p>		4. LICENSEE CONTACT AND TITLE <p style="text-align: center;">James E. Buchanan, R.S.O.</p>	
		5. TELEPHONE NUMBER <i>(Include Area Code)</i> 336/852-0318	6. FACSIMILE NUMBER <i>(Include Area Code)</i> 336/632-0536

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

<input type="checkbox"/> WELL LOGGING	<input type="checkbox"/> LEAK TESTING AND/OR CALIBRATIONS	<input type="checkbox"/> TELETHERAPY/IRRADIATOR SERVICE
<input type="checkbox"/> PORTABLE GAUGES	<input type="checkbox"/> OTHER (Specify) ⇒ _____	
<input checked="" type="checkbox"/> RADIOGRAPHY ⇒	REGISTERED AS USER OF PACKAGING (CERTIFICATES OF COMPLIANCE NUMBERS) 9263 USA/9623/B(U)	

8. CLIENT NAME, ADDRESS, CITY/COUNTY, STATE, ZIP CODE <p>Carolina Steel Corporation Abingdon Bridge Plant Washington County Industrial Park 15083 Industrial Park Road Bristol, Virginia 24201</p>	9. ACTUAL PHYSICAL ADDRESS OF WORK LOCATION <i>(Street and Number or other location. Give as complete an address or directions as possible.)</i> <p style="text-align: center;">Same as client address</p>
10. CLIENT TELEPHONE NUMBER <i>(Include Area Code)</i> 540/669-6649	11. WORK LOCATION TELEPHONE NUMBER <i>(Include Area Code)</i> 540/669-6649

12. DATES SCHEDULED	13. NUMBER OF WORK DAYS	14. ADD	15. DELETE	16. LOCATION REFERENCE NUMBER
FROM: _____ TO: _____				NUMBER TO BE ASSIGNED BY NRC 000145

**LIST ADDITIONAL WORK SITES ON SEPARATE SHEET(S) TO INCLUDE ALL INFORMATION CONTAINED IN ITEMS 9-16 ABOVE.**

17. LIST RADIOACTIVE MATERIAL, WHICH WILL BE POSSESSED, USED, INSTALLED, SERVICED, OR TESTED  
*(Include description of type and quantity of radioactive material, sealed sources, or devices to be used.)*

SPEC Model 150, S/N \_\_\_\_\_, Iridium 192, Model G-60, S/N \_\_\_\_\_ Curies on date \_\_\_\_\_

18. AGREEMENT STATE SPECIFIC LICENSE WHICH AUTHORIZES THE UNDERSIGNED TO CONDUCT ACTIVITIES WHICH ARE THE SAME, EXCEPT FOR LOCATION OF USE, AS SPECIFIED IN ITEM 9 ABOVE. <i>(Four copies of the specific license must accompany the initial NRC Form 241.)</i>	LICENSE NUMBER 041-0766-1	STATE NC	EXPIRATION DATE March 31, 2001
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**19. CERTIFICATION (MUST BE COMPLETED BY APPLICANT)**

I, THE UNDERSIGNED, HEREBY CERTIFY THAT:

- All information in this report is true and complete.
- I have read and understand the provision of the general license 10 CFR 150.20 reprinted on the instructions of this form; and I understand that I am required to comply with these provisions as to all byproduct, source, or special nuclear material which I possess and use in non-Agreement States or offshore waters under the general license for which this report is filed with the U.S. Nuclear Regulatory Commission.
- 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. With the exception of work conducted in off-shore waters, which is authorized for an unlimited period of time in the calendar year.
- I understand that I may be inspected by NRC at the above listed work site locations and at the Licensee home office address for activities performed in non-Agreement States or offshore waters.
- I understand that conduct of any activities not described above, including conduct of activities on dates or locations different from those described above or without NRC authorization, may subject me to enforcement action, including civil or criminal penalties.

CERTIFYING OFFICER - RSO or Management Representative <i>(Name and Title)</i> James E. Buchanan, R.S.O.	SIGNATURE	DATE
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**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 representation to any department or agency of the United States as to any matter within its jurisdiction.**

<b>FOR NRC USE ONLY</b>	REVIEWING OFFICIAL <i>(Typed/Printed Name and Title)</i>	SIGNATURE	DATE	TOTAL USAGE -- DAYS TO DATE
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**RADIOACTIVE MATERIALS SECTION  
DIVISION OF RADIATION PROTECTION  
N.C. DEPARTMENT OF ENVIRONMENT AND NATURAL RESOURCES  
RADIOACTIVE MATERIALS LICENSE**

Pursuant to North Carolina Regulations for Protection Against Radiation and in reliance on statements and representations heretofore made by the licensee, a license is hereby issued authorizing the licensee to receive, acquire, own, possess, transfer and import radioactive materials listed below; and 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 North Carolina Department of Environment and Natural Resources now or hereafter in effect and to any conditions specified below.

Licensee		3. License No.:	041-0766-1
1. Name:	S.K. McBryde, Inc.	4. Expiration Date:	March 31, 2001
2a. Mailing Address:	c/o TEI Environmental, Inc 624-D Guilford College Rd. Greensboro, NC 27409	5. Amendment No.:	16
b. Physical Address:	c/o Carolina Steel Hwy 421 West Colfax, NC 27234		
6. Radioactive Material (element and mass number)	7. Chemical and/or Physical Form	8. Maximum Amount of Radioactivity and/or Quantity of Radioactive Material which the Licensee may Possess at any one time.	
A. Iridium 192	A. Sealed Source (SPEC M# G-60)	A. 600 Curies (no single source to exceed 150 Curies)	

9. Authorized Use:

A. To be used in a SPEC Model 150 exposure device for industrial radiography and a SPEC Model C-1 source changer.

**CONDITIONS**

10. A. The authorized place of receipt and storage of radioactive material is Carolina Steel Corporation, Hwy 412 West, Colfax, NC 27234.
- B. Radioactive materials may be used at temporary jobsites of the licensee throughout the State of North Carolina in areas not under exclusive Federal jurisdiction (Federal installations such as military bases, VA hospitals, etc). Authorization for the use of radioactive materials at temporary jobsites under exclusive Federal jurisdiction shall be obtained either by (1) filing an NRC Form 241 [10 CFR 150.20(b)], or (2) applying for reciprocity, or (3) applying for a specific license from the NRC if the length of the job is to exceed six (6) months.
- C. The North Carolina Division of Radiation Protection Radioactive Materials Section shall be notified of the location(s) of temporary jobsites within North Carolina, except those under Federal jurisdiction, no later than three (3) days prior to the first day of use. If the 3-day notification would impose a hardship on the licensee, the licensee may, upon application to the agency, obtain permission to proceed sooner for a specific job.
- D. This condition does not prohibit the use of radioactive materials in other states; however, before radioactive material can be used at a temporary jobsite in another state, authorization must be obtained from the State, if it is an Agreement State, or from the Nuclear Regulatory Commission for any non-Agreement State, either by filing for reciprocity or applying for a specific license.
11. The licensee shall comply with the provisions of 15A NCAC 11 .1600, "Standards for Protection Against Radiation," 15A NCAC 11 .1000, "Notices, Instructions, Reports and Inspections," and 15A NCAC 11 .0500, "Safety Requirements for Industrial Radiography Operations." (The North Carolina Regulations for Protection Against Radiation are contained in 15A NCAC 11.)
12. A. Licensed material shall only be used by James E. Buchanan, or licensee employees who have successfully completed the SK McBryde, Inc. Management and Training Guidelines and have been instructed in the licensee's routine and emergency operating procedures, and who have been designated in writing as having completed these requirements by the Radiation Safety Officer.
- B. Records of these designations shall be maintained for three (3) years after the company no longer employs the individual.

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N.C. DEPARTMENT OF ENVIRONMENT AND NATURAL RESOURCES  
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Supplementary Sheet

CONDITIONS (continued):

12. C. The Radiation Safety Officer for the activities authorized by this license shall be James E. Buchanan.
13. The licensee is authorized to receive, possess, and use sealed sources of Iridium 192 or Cobalt 60 where the radioactivity exceeds the maximum amount of radioactivity specified in Item 8 of this license provided:
  - A. Such possession does not exceed the quantity per source specified in Item 8 by more than 20% for Iridium 192 or 10% for Cobalt 60; and
  - B. Records of the licensee show that no more than the maximum amount of radioactivity per source specified in Item 8 of the license was ordered from the supplier or transferor of the radioactive material; and
  - C. The levels of radiation for radiographic exposure devices and storage containers do not exceed those specified in 15A NCAC 11 .0503.
14. The licensee shall not transfer possession and/or control of materials or products containing radioactive material as a contaminant except:
  - A. By transfer of waste to an authorized recipient; or
  - B. By transfer to a specifically licensed recipient; or
  - C. As provided otherwise by specific condition of this license pursuant to the requirements of 15A NCAC 11 .1628.
15. The licensee is authorized to possess, use, and transfer up to 1000 pounds of Uranium contained as shielding material in the radiography exposure devices authorized by this license.
16. A. Pursuant to 15A NCAC 11 .0507, the licensee is authorized to perform tests for leakage or contamination of the sealed sources authorized by this license, or tests may be performed by other persons specifically authorized by this agency to perform such services.
  - B. The periodic leak test required by 15A NCAC 11 .0507 does not apply to sealed sources that are stored and not being used. The sources excepted from this test shall be tested for leakage prior to any use or transfer to another person unless they have been leak tested within six (6) months prior to the date of use or transfer.
17. Sealed sources of radioactive material shall not be combined for use in open air techniques to produce a radiation level in excess of the level produced by the largest single source authorized by this license for open air use.
18. The licensee shall conduct a program for inspection and maintenance of radiography exposure devices and storage containers to assure proper functioning of components important to safety. The inspection and maintenance program shall be conducted at intervals not to exceed three (3) months. Records of the results shall be maintained for inspection by the agency.
19. In accordance with 15A NCAC 11 .0509, the licensee shall maintain current utilization logs for inspection by the agency at the address specified in Item 2b.
20. In accordance with 15A NCAC 11 .0508, the licensee shall conduct a quarterly physical inventory to account for all sealed sources received and possessed under the license.
21. In addition to the possession limits in Item 8 above, the licensee shall further restrict the possession of licensed material to quantities below the minimum limit specified in 15A NCAC 11 .0353 for establishing decommissioning financial assurance.
22. The licensee may transport licensed material or deliver licensed material to a carrier for transport, in accordance with the provisions of Section 71.5, Title 10, Code of Federal Regulations, Part 71, "Packaging of Radioactive Material For Transport."

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Supplementary Sheet

CONDITIONS (continued):

23. The licensee shall annually review its Radiation Protection Program for content and implementation [Ref. 15A NCAC 11 .1603(c)]. Documentation of the Radiation Protection program reviews shall be retained for inspection by the agency [Ref. 15A NCAC 11 .1636].
24. The licensee shall institute the provisions of 15A NCAC 11 .1610 when an occupationally exposed woman voluntarily informs her supervisor, in writing, of her pregnancy and the estimated date of conception.
25. The licensee shall ensure that no individual "member of the public" [Reference: 15A NCAC 11 .0104(64)] receives a radiation dose in excess of the limits specified in 15A NCAC 11 .1611(a) while conducting licensed operations.
26. Except as specifically provided otherwise by this license, the licensee shall possess and use radioactive material described in Items 6, 7, and 8 of this license in accordance with statements, representations and procedures contained in:
  - A. Application with attachments dated March 6, 1996, signed by Charles Gay, President; and letter with attachments dated June 12, 1996, signed by James E. Buchanan, RSO.
  - B. Letter dated March 4, 1999, signed by James E. Buchanan, RSO.

Date of Issuance: March 9, 1999

  
For: Richard M. Fry, CHP *cm*  
Director, Division of Radiation Protection