

Graves & Phillips
Engineering &
Maintenance, Inc.



753 McEntire Lane
Decatur, AL 35601
256-351-0332
256-351-0334 fax

January 18, 2001

Ms. Janice Kirby
The Nuclear Regulatory Commission
61 Forsyth Street Southwest
Suite 23T85
Atlanta, Georgia 30303

Phone: 404-562-4719
Fax: 404-562-4955

Subject: Reciprocity for Alabama License No.1291

Ms. Janice Kirby:

Graves & Phillips Engineering & Maintenance, Inc. would like to apply for reciprocity for a job in Tulsa, Oklahoma. Attached is a copy of our Alabama Radiation License #1291, a copy of the check for \$1200.00, and three NRC 241 forms. There is a job needing completion by next Tuesday, 1/23/01, at Atlantis Plastics in Tulsa, Oklahoma. Atlantis is moving their manufacturing plant from the 48th street location to the 76th street location. This service will take place on January 22-25, 2001, and will move a Measurex 300 millicurie Krypton-85 source from the old plant to the new facility. Graves & Phillips is a service representative for the Measurex Company.

The 48th Street location of Atlantis Plastics is being closed and all equipment will eventually be moved to the new plant address at the 76th street address. Atlantis Plastics has nuclear devices already at this facility and will be removing all other equipment by the end of the year.

The Form 241 for Green Bay Packaging is not for a scheduled job, but Green Bay is one of our customers who may require service later this year.

Please call me at 256-351-0332 if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read 'John R. Phillips', with a long horizontal flourish extending to the right.

John R. Phillips
Radiation Safety Officer

NRC FORM 241 (7-1999)

U.S. NUCLEAR REGULATORY COMMISSION

APPROVED BY OMB: NO. 3160-0013

EXPIRES: 07/31/2002

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

(Please read the instructions before completing this form)

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 estimates to the Records Management Branch (T-6 ES), U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001, or by Internet e-mail to h1s1@nrc.gov, and to the Desk Officer, Office of Information and Regulatory Affairs, NEOS-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.

1. NAME OF LICENSEE (Person or firm proposing to conduct the activities described below)
GRAVES & Phillips, Engineering & Maintenance, Inc

2. TYPE OF REPORT
 INITIAL REVISION CLARIFICATION

3. ADDRESS OF LICENSEE (Mailing address or other location where licensee may be located)
**753 McEntire
Decatur AL 35550**

4. LICENSEE CONTACT AND TITLE
John Phillips - RSO
5. TELEPHONE NUMBER (Include Area Code) **256-351-0332**
6. FACSIMILE NUMBER (Include Area Code) **256-351-0334**

7. ACTIVITIES TO BE CONDUCTED UNDER THE GENERAL LICENSE GIVEN IN 10 CFR 160.20

- WELL LOGGING
- LEAK TESTING AND/OR CALIBRATIONS
- TELETHERAPY/IRRADIATOR SERVICE
- PORTABLE GAUGES
- OTHER (Specify) → Reinstall Fix Gauge - Measures
- RADIOGRAPHY → REGISTERED AS USER OF PACKAGING (CERTIFICATES OF COMPLIANCE NUMBERS)

8. CLIENT NAME, ADDRESS, CITY/COUNTY, STATE, ZIP CODE
**ATLANTIS PLASTICS
6940 West 76th St South
Tulsa OKLAHOMA 74131**

9. ACTUAL PHYSICAL ADDRESS OF WORK LOCATION (Street and Number or other location. Give as complete an address or directions as possible.)
Same
10. CLIENT TELEPHONE NUMBER (Include Area Code) **918-446-1655**
11. WORK LOCATION TELEPHONE NUMBER (Include Area Code) **918-446-1655**

12. DATES SCHEDULED		13. NUMBER OF WORK DAYS	14. ADD	15. DELETE	16. LOCATION REFERENCE NUMBER
FROM	TO				NUMBER TO BE ASSIGNED BY NRC
1-22-01	1-25-01	2			

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 (Include description of type and quantity of radioactive material, sealed sources, or devices to be used.)

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 8 ABOVE. (Four copies of the specific license must accompany the initial NRC Form 241.)	LICENSE NUMBER 1291	STATE FL	EXPIRATION DATE 2-28-05
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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 160.20 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 160.20 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 (Name and Title) John Phillip - RSO	SIGNATURE <i>[Signature]</i>	DATE 1-18-01
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WARNING: False statements in this certificate may be subject to OMB 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.

FOR NRC USE ONLY	REVIEWING OFFICIAL (Typed/Printed Name and Title)	SIGNATURE	DATE	TOTAL USAGE - DAYS TO DATE
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<p>NRC FORM 241 (7-1999)</p> <p style="text-align: center;">U.S. NUCLEAR REGULATORY COMMISSION</p> <p style="text-align: center;">REPORT OF PROPOSED ACTIVITIES IN NON-AGREEMENT STATES, AREAS OF EXCLUSIVE FEDERAL JURISDICTION, OR OFFSHORE WATERS</p> <p style="text-align: center;">(Please read the instructions before completing this form)</p>	<p>APPROVED BY OMB: NO. 2160-0013 EXPIRES: 07/31/2002</p> <p>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 (7-4 EB), U.S. Nuclear Regulatory Commission, Washington, DC 20540-0001, or by Internet e-mail to rs1@nrc.gov, and to the Desk Officer, Office of Information and Regulatory Affairs, NECE-10202, (3150-0012), 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.</p>
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<p>1. NAME OF LICENSEE (Person or firm proposing to conduct the activities described below)</p> <p>Graves & Phillips, Engineering & Maintenance Inc</p>	<p>2. TYPE OF REPORT</p> <p><input checked="" type="checkbox"/> INITIAL <input type="checkbox"/> REVISION <input type="checkbox"/> CLARIFICATION</p>
<p>3. ADDRESS OF LICENSEE (Mailing address or other location where licensee may be located)</p> <p>753 McEntire Lane Decatur, AL 35601</p>	<p>4. LICENSEE CONTACT AND TITLE</p> <p>John Phillips - RSO</p>
	<p>5. TELEPHONE NUMBER (Include Area Code) 6. FACSIMILE NUMBER (Include Area Code)</p> <p>256-351-0332 256-351-0334</p>

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

WELL LOGGING LEAK TESTING AND/OR CALIBRATIONS THERAPY/IRRADIATOR SERVICE
 PORTABLE GAUGES OTHER (Specify) ⇒ Work of Obsolete Fixed gauges
 RADIOGRAPHY ⇒ REGISTERED AS USER OF PACKAGING (CERTIFICATES OF COMPLIANCE NUMBERS)

<p>8. CLIENT NAME, ADDRESS, CITY/COUNTY, STATE, ZIP CODE</p> <p>Green Bay Packaging PO Box 3568 Winchester, Va 22604</p>	<p>9. ACTUAL PHYSICAL ADDRESS OF WORK LOCATION (Street and Number or other location. Give as complete an address or directions as possible.)</p> <p>285 Park Center Dr Winchester VA 22604</p>
<p>10. CLIENT TELEPHONE NUMBER (Include Area Code)</p> <p>1-800-750-8800</p>	<p>11. WORK LOCATION TELEPHONE NUMBER (Include Area Code)</p> <p>1-540-6788</p>

12. DATES SCHEDULED	13. NUMBER OF WORK DAYS	14. ADD	15. DELETE	16. LOCATION REFERENCE NUMBER
FROM: none Scheduled	TO: Just a Reference			NUMBER TO BE ASSIGNED BY NRC

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
(Include description of type and quantity of radioactive material, sealed sources, or devices to be used.)

For use later

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. (Four copies of the specific license must accompany the initial NRC Form 241.)	LICENSE NUMBER	STATE	EXPIRATION DATE
	1291	AL	2-28-05

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 (Name and Title)	SIGNATURE	DATE
John Phillips	<i>John Phillips</i>	1-18-01

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.

FOR NRC USE ONLY	REVIEWING OFFICIAL (Typed/Printed Name and Title)	SIGNATURE	DATE	TOTAL USAGE - DAYS TO DATE



STATE OF ALABAMA DEPARTMENT OF
PUBLIC HEALTH

Donald E. Williamson, MD
State Health Officer

November 9, 2000

Kirkland J. Graves, President
Graves & Phillips Engineering & Maintenance, Inc.
753 McEntire Lane
Decatur, Alabama 35601

Re: License No. 1291
Amendment No. 3

Dear Mr. Graves:

In accordance with your recent request, your Alabama Radioactive Material License has been amended. We are pleased to enclose License Amendment No. 3.

If you have any questions regarding interpretation of the amendment, please let us know. Additional copies of the rules covering this program (Chapter 420-3-26, Radiation Control) are available at \$6.50 each. Please direct your request to Office of Radiation Control, Alabama Department of Public Health, P.O. Box 303017, Montgomery, Alabama 36130-3017. Please make check payable to Alabama Department of Public Health. We are always ready to assist your program in every possible way.

Sincerely,

A handwritten signature in cursive script that reads "Kirksey E. Whatley".

Kirksey E. Whatley, Director
Office of Radiation Control

KEW/DW/jsm

Enclosure

ALABAMA DEPARTMENT OF PUBLIC HEALTH

RADIOACTIVE MATERIAL LICENSE

AMENDMENT NO. 3

Pursuant to the Alabama Department of Public Health Rules, 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 of the Alabama Department of Public Health now or hereafter in effect and to any conditions specified below.

LICENSEE			
1. Name 2. Address Graves & Phillips Engineering & Maintenance 753 McEntire Lane Decatur, Alabama 35601	3. License Number <p style="text-align: center;">1291 is amended in it's entirety to read:</p> 4. Expiration Date <p style="text-align: center;">February 28, 2005</p> 5. File No.		
6. Radioactive Material (Element and Mass Number)	7. Type of Radioactive Material License	8. Chemical and/or Physical Form	9. Maximum Radioactivity and/or quantity of material which licensee may possess at any one time.
SEE PAGE TWO	3-P	SEE PAGE TWO	SEE PAGE TWO
10. Authorized Use SEE PAGE THREE			

CONDITIONS

11. Unless otherwise specified, the authorized place of use is the licensee's address stated in item 2 above.
12.
 - A. Radioactive material may be used at customer sites of the licensee anywhere in Alabama that the Agency has jurisdiction.
 - B. Radioactive material listed in Subitem 6.H shall only be used at the licensee's facility located at 753 McEntire Lane, Decatur, AL.
 - C. Leak test samples and contamination on leak test samples either performed by the licensee or by the licensee's customers using approved leak test kits may also be used at the licensee's facilities located at 753 McEntire Lane, Decatur, AL, and 84 Eiland Road, Cordova, AL.

SUPPLEMENTARY SHEET

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1291

Continued From Page _____

License Number _____
Amendment No. 3

6. Radioactive Material (Element and mass number)	8. Chemical and/or Physical Form	9. Maximum Radioactivity and/or quantity of material which license may possess at any one time
A. Americium 241	A. Sealed Sources	A. No single source to exceed 1200 millicuries
B. Cesium 137	B. Sealed Sources	B. No single source to exceed 10 curies
C. Krypton 85	C. Sealed Sources	C. No singles source to exceed 1200 millicuries
D. Strontium 90	D. Sealed Sources	D. No single source to exceed 1200 millicuries
E. Cobalt 60	E. Sealed Sources	E. No single source to exceed 10 curies
F. Promethium 147	F. Sealed Sources	F. No single source to exceed 1000 millicuries
G. Americium 241, Cesium 137, Strontium 90, Cobalt 60, Promethium 147	G. Leak test samples	G. As necessary for uses authorized in Subitem 10.G.
H. Cesium 137	H. Sealed Source (Amersham Model 77302)	H. 165 millicuries

ALABAMA DEPARTMENT OF PUBLIC HEALTH
RADIOACTIVE MATERIAL LICENSE

Continued

Supplementary Sheet

1291

License Number _____

Amendment No. 3

CONDITIONS

10. Authorized Uses

- A. Through F. To be used in approved source holders manufactured by ABB, Berthold, Kay-Ray, Measurex, Ohmart, Ronan, Rosemount and Texas Nuclear for installation, relocation, leak testing, shutter testing and maintenance, preparation for shipment and initial radiation surveys.
- G. Leak test samples as described in Condition 17. of this license and as described in application dated December 14, 1999.
- H. Survey meter calibration.

ALABAMA DEPARTMENT OF PUBLIC HEALTH
RADIOACTIVE MATERIAL LICENSE

Continued

Supplementary Sheet

1291

License Number

Amendment No.

3

CONDITIONS

13. The licensee shall comply with the provision of Rule 420-3-26-.01, General Provisions, Rule 420-3-26-.02, Licensing, Rule 420-3-26-.03, Standards for Protection Against Radiation, and Rule 420-3-26-.10, Notices, Instructions, and Reports to Workers; Inspections, of Chapter 420-3-26, Radiation Control, Alabama Administrative Code.
14. The licensee is authorized to distribute leak test kits to customers and to analyze leak test swabs as described in application dated December 14, 1999.
15.
 - A. Radioactive material shall only be used by, or under the supervision and in the physical presence of individuals who have successfully completed the licensee's forty (40) hour radiation safety training course, have completed sixty (60) days of in-field training and have been approved by John Phillips, Radiation Safety Officer.
 - B. Individuals who meet the requirements of paragraph 15.A. shall be evaluated by the Radiation Safety Officer at periods not to exceed six (6) months.
16. A calibrated, operable radiation survey meter, suitable for the activities, radiation types and energies being used, must be immediately available when performing licensed activities.
17. The licensee is authorized to collect leak test samples from sources possessed by the licensee's customers for analysis in accordance with procedures contained in application dated December 14, 1999.
18. The licensee is authorized to conduct maintenance on Ohmart/Measurex Model BAL source holders possessed by the licensee's customers in accordance with the procedures contained in application dated December 14, 1999.
19. This license does not authorized the possession of source holders listed in Subitems 10.A. through 10.F. which contain radioactive material.

ALABAMA DEPARTMENT OF PUBLIC HEALTH
RADIOACTIVE MATERIAL LICENSE

Continued

Supplementary Sheet

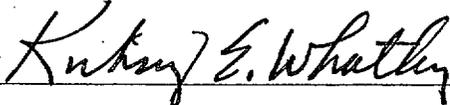
1291

License Number _____

Amendment No. 3

CONDITIONS

20. A. Each sealed source containing radioactive material, other than Hydrogen 3, with a half-life greater than thirty (30) days and in any form other than gas shall be tested for leakage and/or contamination at intervals not to exceed six (6) months. In the absence of a certificate from a transferor indicating that a test has been made within six (6) months prior to the transfer, the sealed source shall not be put into use until tested.
- B. The test shall be capable of detecting the presence of 0.005 microcurie of radioactive material on the test sample. The test sample shall be taken from the sealed source or from the surfaces of the device in which the sealed source is permanently mounted or stored on which one might expect contamination to accumulate. Records of leak test results shall be kept in units of microcuries and maintained for inspection by the Agency.
- C. If the test reveals the presence of 0.005 microcurie or more of removable contamination, 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 Agency regulations. A report shall be filed within five (5) days of the test with the Director, Office of Radiation Control, Alabama Department of Public Health, Montgomery, Alabama 36130, describing the equipment involved, the test results, and the corrective action taken.
- D. Tests for leakage and/or contamination shall be performed by the licensee, or by other persons specifically authorized by the U.S. Nuclear Regulatory Commission or an Agreement State to perform such service.
21. Except as specifically provided otherwise in this license, the licensee shall conduct its radiation safety program in accordance with statements, representations, and procedures contained in the documents, including any enclosures, listed below. Alabama's Radiation Protection Rules shall govern unless the statements, representations and procedures in the licensee's application and correspondence are more restrictive than the rules.
- A. Application dated December 14, 1999, signed by John Phillips, with attachments.
- B. Letter dated January 7, 2000, with attachments.
- C. Letter received April 21, 2000, signed by John R. Phillips, with attachments.
- D. Letter dated August 10, 2000, signed by John R. Phillips, with attachments.
- E. Letter dated November 3, 2000, signed by Kirkland J. Graves, with attachments.

Date of Issuance November 9, 2000


Director
 DIVISION OF RADIATION CONTROL



Donald E. Williamson, M.D.
 State Health Officer
 ALABAMA DEPARTMENT OF PUBLIC HEALTH