

# 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 (Person or firm proposing to conduct the activities described below)  
**ABLE TESTING & INSPECTION INC.**

2. TYPE OF REPORT  
 INITIAL     REVISION     CLARIFICATION

3. ADDRESS OF LICENSEE (Mailing address or other location where licensee may be located)  
 PO BOX ~~XXX~~ 158  
 HOWES CAVE, NY 12092

4. LICENSEE CONTACT AND TITLE  
**Michael Chauvin, V/P  
 Radiation Safety Officer**

5. TELEPHONE NUMBER (Include Area Code)    6. FACSIMILE NUMBER (Include Area Code)  
**518 357-9079    518-357-4683**

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) ⇒ \_\_\_\_\_  
 RADIOGRAPHY ⇒ REGISTERED AS USER OF PACKAGING (CERTIFICATES OF COMPLIANCE NUMBERS)

8. CLIENT NAME, ADDRESS, CITY/COUNTY, STATE, ZIP CODE  
**Vermont Gas Systems, Inc.  
 85 Swift Street  
 So. Burlington, VT 05403**

9. ACTUAL PHYSICAL ADDRESS OF WORK LOCATION (Street and Number or other location. Give as complete an address or directions as possible.)  
**85 Swift Street, Burlington VT  
 Field Gas Transmission Lines & Stations  
 in Swanton & St. Albans, VT**

10. CLIENT TELEPHONE NUMBER (Include Area Code)    11. WORK LOCATION TELEPHONE NUMBER (Include Area Code)  
**802-863-8899    802-863-8899**

12. DATES SCHEDULED		13. NUMBER OF WORK DAYS	14. ADD	15. DELETE	16. LOCATION REFERENCE NUMBER
FROM 7/15/02	TO 10/30/02	90			NUMBER TO BE ASSIGNED BY NRC <b>000856</b>

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.)  
**Iridium 192 Source in Amersham 660B Exposure Device**

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: **2555-3760**    STATE: **NY**    EXPIRATION DATE: **11/30/2003**

19. CERTIFICATION (MUST BE COMPLETED BY APPLICANT)

I, 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 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.
- 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. With the exception of work conducted in off-shore waters, which is authorized for an unlimited period of time in the calendar year.
- d. 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.
- e. 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  
**Lynn Chauvin, President**    *Lynn Chauvin*    **7/2/02**

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  
**John McParrott**    *John McParrott*    **7/10/02**    **108**

50 7/10/02



P.O. Box 158, Howes Cave, NY 12092-0158  
(518) 357-9079 • Fax (518) 357-4683

United States Nuclear Regulatory Commission  
Region #1  
475 Allendale Road  
King of Prussia, PA 19406

Attn: Cheryl Buracker

Re: Reciprocity VT  
NRC Form 241

RECEIVED  
REGION 1  
2002 JUL -5 PM 1:08

Dear Ms. Buracker:

Enclosed please find executed NRC Form 241, Report of proposed activities in Non-agreement states, areas of exclusive federal jurisdiction or offshore waters.

I have also enclosed our check # 6743 in the amount of \$1200.00 for the required filing fee.

We anticipate commencing this project on July 15, 2002. If you have any questions or need clarification, please contact either the undersigned or Michael Chauvin at 518-357-9079.

Sincerely,  
Able Testing & Inspection Inc.

  
Lynn Chauvin  
President



STATE OF NEW YORK  
DEPARTMENT OF LABOR  
DIVISION OF SAFETY AND HEALTH  
Radiological Health Unit  
Building #12, Room 169  
State Office Building Campus  
Albany, NY 12240

November 21, 2000

Mr. Michael Chauvin, RSO  
Able Testing & Inspection, Inc.  
1286 Pangburn Road  
Schenectady, New York 12306

License: 2555-3760  
Reference: 2  
Amendment: 1  
DL No. 00-308

Dear Mr. Chauvin:

Enclosed is the renewal of your New York State Department of Labor Radioactive Materials License number ~~2555-3760~~, authorizing the possession of radioactive materials in the types and amounts specified for the uses indicated. All activities conducted under this license shall be governed by the provisions of Industrial Code Rule 38 (12 NYCRR 38) and by the specific conditions of the license. You should read these documents carefully to familiarize yourself with all applicable requirements including any statements, representations and procedures contained in documents specified in License Condition 19, to which you have committed as part of the licensing review process. These requirements should also be included in the initial and annual refresher training provided to all employees who use licensed material.

Please update your Radiation Safety Manual to indicate that any accident described in 38.34(hh) or 38.29 will be reported to the Department as required, and that all persons who will perform work under this license will carry the Department's office and after-hours phone numbers at all times.

Your program will be evaluated periodically by inspectors from the Radiological Health Unit. A copy of this license (including amendments) must be maintained at the address indicated in License Condition 2, along with other required records, for their review.

If you have any questions please do not hesitate to contact this office.

Sincerely,

Charles J. Burns  
Associate Radiophysicist

enc: Renewal  
CR 38



STATE OF NEW YORK - DEPARTMENT OF LABOR  
DIVISION OF SAFETY AND HEALTH

**RADIOACTIVE MATERIALS LICENSE**

DL# 00-308

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PURSUANT TO THE LABOR LAW AND INDUSTRIAL CODE RULE 38, AND IN RELIANCE ON STATEMENTS AND REPRESENTATIONS HERETOFORE MADE BY THE LICENSEE DESIGNATED BELOW. A LICENSE IS HEREBY ISSUED AUTHORIZING SUCH LICENSEE TO RECEIVE, POSSESS, USE AND TRANSFER RADIOACTIVE MATERIAL(S) DESIGNATED BELOW; AND TO USE SUCH RADIOACTIVE MATERIAL(S) FOR THE PURPOSE(S) AND AT THE PLACE(S) DESIGNATED BELOW. THIS LICENSE IS SUBJECT TO ALL APPLICABLE RULES, REGULATIONS, AND ORDERS NOW OR HEREAFTER IN EFFECT OF ALL APPROPRIATE REGULATORY AGENCIES AND TO ANY CONDITIONS SPECIFIED BELOW.

1. NAME OF LICENSEE		3. LICENSE NUMBER
<p style="text-align: center;">FEIN: 14-1733235</p> <p><b>ABLE TESTING &amp; INSPECTION, INC.</b></p> <p style="text-align: center;">PHONE: (518)357-9079</p>		2555-3760
2. ADDRESS OF LICENSEE		4. EXPIRATION DATE
<p>1286 PANGBURN ROAD</p> <p>SCHENECTADY, NEW YORK 12306</p>		November 30, 2003
		5a. REFERENCE No.
		6. AMENDMENT No.
		2
		1
6. RADIOACTIVE MATERIALS (element in mass number)	7. CHEMICAL AND/OR PHYSICAL FORM	8. MAXIMUM QUANTITY LICENSEE MAY POSSESS AT ANY ONE TIME
A. Cobalt 60	A. through E. Sealed Sources (See Condition 9A)	A. through E. (See Condition 9.B.)
B. Cesium 137		
C. Ytterbium 169		
D. Thulium 170		
E. Iridium 192		
F. Uranium, depleted	F. Shielding	F. 999 kilograms total

9. Authorized use:  
Conditions 6.A. through 6.E.:

- A. The licensee is authorized to use any sealed source, radiographic exposure device or source exchanger which has been manufactured and distributed in accordance with a specific license issued by an Agreement State or the United States Nuclear Regulatory Commission for the performance of industrial radiography, and which meets the requirements of paragraphs 38.34(b) and 38.34(c) of 12NYCRR Part 38. Combinations of sources, source exchangers, and/or exposure devices must be compatible for use as stated in a Sealed Source and Device Registration Certificate (i.e. stated in the registration certificate for the source, source exchanger, or exposure device).
- B. No single source may exceed the maximum activity specified for that nuclide in the Sealed Source and Device Registration Certificate for any source exchanger or exposure device in which the source is to be used.



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DIVISION OF SAFETY AND HEALTH

**RADIOACTIVE MATERIALS LICENSE**

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3. License Number 2555-3760

5a. Ref. No. -2-

b. Amend. No. -1-

- C. The licensee is authorized to receive, possess, and use sealed sources of Cobalt 60 or Iridium 192 where the radioactivity exceeds the maximum amount of radioactivity specified in Condition 9.B. of this license provided:
- (i) such possession does not exceed the quantity per source specified in Condition 9.B. by more than 10% for Cobalt 60 or 20% for Iridium 192;
  - (ii) records of the licensee show that no more than the maximum amount of Radioactivity per source specified in Condition 9.B. of the license was ordered from the supplier or transferor of the radioactive material; and
  - (iii) the levels of radiation for radiographic exposure devices and storage containers do not exceed those specified in paragraph 38.34(c) of 12 NYCRR Part 38.
- D. Notwithstanding paragraph (A) of this condition, and the requirements of paragraph 38.34(b) of 12 NYCRR Part 38, equipment used in industrial radiographic operations need not comply with section 8.9.2(c) of the Endurance Test in American National Standards Institute N432-1980, if the prototype equipment has been tested using a torque value representative of the torque that an individual using the radiography equipment can realistically exert on the lever or crankshaft of the drive mechanism.
- E. In addition to the possession limits in paragraphs B. and C. of this condition, the licensee shall further restrict the possession of licensed material to quantities below the limits specified in section 38.7 of 12 NYCRR Part 38.

Condition 6.F.:

As shielding in radiographic exposure devices, source exchangers and storage containers.

10. A. The Radiation Safety Officer for this license is Michael Chauvin.
- B. All use of radioactive materials shall be under his supervision, and shall only be by persons having the training and experience specified in 12 NYCRR 38.34(j).
11. A. Licensed material shall be stored at licensee installation specified in Condition 2. of this license and may be used at temporary job sites of the licensee anywhere within the State of New York, where the Department of Labor exercises jurisdiction for regulating the use of radioactive material.
- B. Overnight storage at other locations shall be in accordance with statements referenced in Condition 19 of the license, providing that such storage may not be in a residence, or in an attached garage except within a vehicle. Any vehicle used for storage shall be driven only for purposes associated with use or transport of the contained radioactive material, by a person qualified to use the material, and no passengers shall be carried unless they are also involved in work under this license. Vehicular storage shall only be allowed if no other storage is possible and shall not exceed five (5) consecutive nights unless authorization to exceed this limit is obtained from the Department.



STATE OF NEW YORK - DEPARTMENT OF LABOR  
DIVISION OF SAFETY AND HEALTH

**RADIOACTIVE MATERIALS LICENSE**

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3. License Number 2555-3760  
(Condition 11 continued)

5a. Ref. No. -2-

b. Amend. No. -1-

- C. Whenever radiography will be performed outside of a permanent radiographic installation the radiographer must be accompanied by another qualified radiographer, or an individual with at least the qualifications of a radiographer's assistant.
- D. The licensee is not authorized to perform retrieval or recovery of a loose or disconnected source, or a source that cannot be retracted to the shielded position by normal means.
12. The licensee shall not authorize any radiographer to use any model of a radiographic exposure device, related handling tool, or radiation survey instrument until the radiographer has been trained in the use of such equipment, and has demonstrated competence in its use. For each radiographer, the licensee shall maintain the following records available for inspection:
- A. Training received by the radiographer in the use of such equipment, including dates, duration, and name of instructor.
- B. Each radiographic exposure device which the radiographer has demonstrated competence in using, including the date of demonstration of competence.
13. Current copies of the following documents shall be maintained at temporary job sites for Department inspection:
- A. operating and emergency procedures; and
- B. evidence of latest calibration of the radiation survey instruments in use at the site; and
- C. the latest records of the survey of the radiographic exposure device and source guide tube after the last exposure of the work day, after any source exchange and whenever a device is placed in a storage area; and
- D. the shipping papers for the transportation of radioactive materials.
14. The licensee must ensure that all persons authorized to use radiography exposure devices comply with safe use and maintenance procedures and that they do not leave a device unattended or unsecured at any time, even for a few minutes.
15. In the event that a theft, loss, inability to retract a source or other serious incident does occur, the Department must be notified immediately by telephone and subsequent information acquired by the licensee must be reported as it is received. All radiography personnel must carry the Department's current telephone number in their emergency procedures along with the after-hours telephone number for the New York State Warning Point.



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**RADIOACTIVE MATERIALS LICENSE**

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3. License Number 2555-3760

5a. Ref. No. -2-

b. Amend. No. -1-

16. A. The licensee is not authorized to repair, modify or affect any changes in the radiographic exposure devices or associated equipment.
- B. The licensee shall ensure that all radiographic exposure devices and associated equipment, have all required labels, and that labels are legible and clearly visible.
17. A. Leak tests of sealed sources shall be performed every six (6) months in accordance with Sections 38.22(f) and 38.34(h)(3) of Code Rule 38. Off-site analysis of leak test samples shall be performed by persons specifically authorized by the U.S. Nuclear Regulatory Commission or an Agreement State to perform such services.
- B. Upon detection of 0.005 microcuries or more of removable contamination, the licensee shall immediately remove such Sealed source from use and take action to prevent the spread of contamination. A report shall be filed within five (5) days with the State of New York, Department of Labor, Radiological Health Unit, State Office Building Campus, Building 12, Room 169, Albany, New York 12240 specifying the source involved, the tests results and corrective action taken.
18. The licensee shall instruct persons who engage in work under the license, in accordance with section 38.27(c) of Code Rule 38. Such instruction shall include the licensee's operating and emergency procedures, and other information contained in documents incorporated in Condition 19.
19. 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 Department's regulations shall govern, unless the statements, representations and procedures in the licensee's application and correspondence are more restrictive than the regulations.
- A. License Renewal Request Form dated October 15, 1997, signed by Lynn H. Chauvin, with attachments.
- B. License Renewal Application dated December 20, 1997, signed by Michael Chauvin, with attachments.
- C. Licensee's "Radiation Safety Manual" dated January, 1998.
- D. License Renewal Request Form dated October 24, 2000, signed by Lynn H. Chauvin, with attachments.

James T. Dillon  
Acting Commissioner of Labor

by: Clayton J. Bradt  
Principal Radiophysicist

DATE: 11/21/05