



7200 E. ABC Lane, Columbia, MO 65202 • Tel: 573/474-8579 Fax: 573/443-9033

August 12, 2004

Certified Mail #7000 0520 0019 0479 8824
Return Receipt Requested

Materials Licensing Branch
US Nuclear Regulatory Commission, Region III
2443 Warrenville Road Suite 210
Lisle, IL 60532-4352

A
030-05154

RE: License No. 24-13365-01 Amendment Request

Dear Sir or Madame,

Analytical Bio-Chemistry Laboratories, also known as ABC Labs, has NRC License No. 24-13365-01, a Broadscope Type A Materials License which allows possession and use of up to Twenty (20) curies of carbon-14, but only 1 curie of tritium. ABC Labs has recently received a request from a client for production of a research compound that will require use of tritium labeled precursors in amounts greater than one curie. We would like to amend condition 6.G. of our license to allow possession and use of twenty (20) curies of tritium. We would also like to change Condition 9.G. of the license to include tritium with items A and B to allow possession, use and processing incident to manufacture of radiochemicals, for storage prior to distribution of manufactured radiochemicals, and for packaging and distribution of manufactured radiochemicals to persons authorized to receive the licensed material pursuant to the terms and conditions of specific licenses issued by the Nuclear Regulatory Commission or Agreement State. Tritium uses would also remain the same as currently authorized in condition 9.G., specifically for research and development as defined in 10 CFR 30.4 involving bio-tracer studies in animals and plants, and in field studies.

All tritium will be used by the same authorized users in the same authorized facilities following the currently approved procedures now being used for carbon-14. Analysis of bioassay samples for tritium has already been added to our bioassay procedures. Authorized facilities will be monitored for tritium on the same frequency as currently authorized for carbon-14. Tritium wastes will be handled and stored the same as our existing long half-life wastes. No extra facilities are necessary for this amendment. Since no new facilities will be potentially contaminated, the existing financial assurance in our Decommissioning Funding Plan should be adequate to cover the possession and use of this amount of tritium.

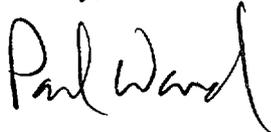
313651
REC'D AUG 17 2004
AUG 17 2004

August 12, 2004

As I indicated in my letters to Patricia Pelke at your office dated April 12, May 18 and May 27, 2004, we have ceased use of the sanitary lagoon for land application as of March 2, 2004. All sewerage effluents from this facility now go to the POTW in Columbia, Missouri. Any discharge of tritium to the sanitary sewer will be in compliance with 10 CFR 20 Appendix B.

I appreciate your prompt attention to this request. If you have any questions, please e-mail wardp@abclabs.com or telephone me at (573) 443-9070.

Sincerely,

 12 Aug 2004

Paul Ward, M.S., J.D.
Radiation Safety Officer
Analytical Bio-Chemistry Laboratories

: (FOR LFMS USE)
 : INFORMATION FROM LTS
 : -----
 :
 : Program Code: 03211
 : Status Code: 0
 : Fee Category: 3A
 : Exp. Date: 20070331
 : Fee Comments: MFG/DIST 04/20/00 AMD #17
 : Decom Fin Assur Reqd: Y
 : ::

BETWEEN:
 License Fee Management Branch, ARM
 and
 Regional Licensing Sections

LICENSE FEE TRANSMITTAL

A. REGION

1. APPLICATION ATTACHED
 Applicant/Licensee: ANALYTICAL BIO-CHEMISTRY LABS., INC
 Received Date: 20040817
 Docket No: 3005154
 Control No.: 313651
 License No.: 24-13365-01
 Action Type: Amendment

2. FEE ATTACHED
 Amount: _____
 Check No.: 0

3. COMMENTS

Signed D.A. Hensley
 Date 8-25-2004

B. LICENSE FEE MANAGEMENT BRANCH (Check when milestone 03 is entered /_/)

1. Fee Category and Amount: _____

2. Correct Fee Paid. Application may be processed for:
 Amendment _____
 Renewal _____
 License _____

3. OTHER _____

Signed _____
 Date _____