

January 18, 2005
CEC 96434

License No. 37-18456-02
Docket No. 030-15116

P-2

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REGION 1
JAN 20 P 1:39

Licensing Assistant Section
Nuclear Materials Safety Branch
U.S. Nuclear Regulatory Commission, Region I
475 Allendale Road
King of Prussia, PA 19406-1415

**RE: Supplemental Information Related to
Application for Renewal of License No. 37-18456-02**

Dear Sir or Madam,

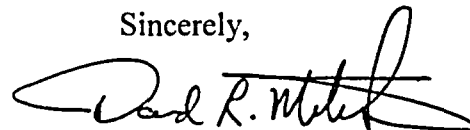
Attached please find additional information which supplements information submitted previously with NRC form 313 (reference CEC Letter 95825 dated December 10, 2004).

Attachments include:

- 1) Revised pages for our Radiation Safety Procedure
- 2) Appendix B Checklist from NUREG-1556

Please contact me if you have any questions or require any additional information.

Sincerely,



David R. Mitrik
Radiation Safety Officer

Attachments

DM/kmc

cc: R. Artuso
File

2018 WAVERLY STREET
PITTSBURGH, PA 15218-2402
(412) 351-6465
FAX: (412) 351-6401
E-MAIL: lab@cectesting.com

136158

NMSS/RGNI MATERIALS-032

ITEMS 5 AND 6: MATERIALS TO BE POSSESSED AND PROPOSED USES

Yes	No	Radioisotope	Manufacturer or Distributor Model No.	Quantity	Use As Listed on SSD Certificate	Specify Other Uses Not Listed on SSD Certificate
✓		Cesium-137	Sealed source manufacturer or distributor and model number: <u>SEE ATTACHED SHEET</u> Device manufacturer or distributor and model number: <u>SEE ATTACHED SHEET</u>	Not to exceed either the maximum activity per source or maximum activity per device as specified in Sealed Source and Device Registration Certificate	Yes <input type="checkbox"/> Specific description of the gauge use: _____ _____ _____ _____ _____	<input type="checkbox"/> Not applicable <input type="checkbox"/> Uses are: _____ _____ (Submit safety analysis supporting safe use)
✓		Americium-241	Sealed source manufacturer or distributor and model number: <u>SEE ATTACHED SHEET</u> Device manufacturer or distributor and model number: <u>SEE ATTACHED SHEET</u>	Not to exceed either the maximum activity per source or maximum activity per device as specified in Sealed Source and Device Registration Certificate	Yes <input type="checkbox"/> Specific description of the gauge use: _____ _____ _____ _____ _____	<input type="checkbox"/> Not applicable <input type="checkbox"/> Uses are: _____ _____ (Submit safety analysis supporting safe use)

APPENDIX B

Yes	No	Radioisotope	Manufacturer or Distributor Model No.	Quantity	Use As Listed on SSD Certificate	Specify Other Uses Not Listed on SSD Certificate
	✓	Californium-252	Sealed source manufacturer or distributor and model number: <hr/> Device manufacturer or distributor and model number: <hr/>	Not to exceed either the maximum activity per source or maximum activity per device as specified in Sealed Source and Device Registration Certificate	Yes <input type="checkbox"/> Specific description of the gauge use: <hr/> <hr/> <hr/> <hr/> <hr/>	<input type="checkbox"/> Not applicable <hr/> <input type="checkbox"/> Uses are: <hr/> (Submit safety analysis supporting safe use)
	✓	Other Isotope (Specify):	Sealed source manufacturer or distributor and model number: <hr/> Device manufacturer or distributor and model number: <hr/>	Not to exceed either the maximum activity per source or maximum activity per device as specified in Sealed Source and Device Registration Certificate	Yes <input type="checkbox"/> Specific description of the gauge use: <hr/>	<input type="checkbox"/> Not applicable <hr/> <input type="checkbox"/> Uses are: <hr/> (Submit safety analysis supporting safe use)
<i>Financial Assurance Required and Evidence of Financial Assurance Provided</i>						

ITEMS 7 THROUGH 11: TRAINING AND EXPERIENCE, FACILITIES AND EQUIPMENT, RADIATION SAFETY PROGRAM, AND WASTE DISPOSAL

Item No. And Title	Suggested Response	Yes	Alternative Procedures Attached
<p>7. INDIVIDUAL(S) RESPONSIBLE FOR RADIATION SAFETY PROGRAM AND THEIR TRAINING AND EXPERIENCE – RADIATION SAFETY OFFICER</p> <p>Name: <u>DAVID MITRIK</u></p>	<p>Before obtaining licensed materials, the proposed RSO will have successfully completed one of the training courses described in Criteria in the section entitled "Individual(s) Responsible for Radiation Safety Program and Their Training and Experience – Radiation Safety Officer" in NUREG-1556, Vol. 1, Rev. 1, dated November 2001.</p> <p>SEE ATTACHED TRAINING CERTIFICATE</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
8. TRAINING FOR INDIVIDUALS WORKING IN OR FREQUENTING RESTRICTED AREAS	<p>Before using licensed materials, authorized users will have successfully completed one of the training course described in Criteria in the section entitled "Training for Individuals Working In or Frequenting Restricted Areas" in NUREG-1556, Vol. 1, Rev 1, dated November 2001.</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
9. FACILITIES AND EQUIPMENT	<p>No information needs to be submitted in response to this item; key issues are addressed under "Radiation Safety Program – Public Dose" and "Radiation Safety Program – Operating and Emergency Procedures."</p>	<p>Separate Item 9 Response</p> <p>Need Not Be Submitted With Application</p>	
10. RADIATION SAFETY PROGRAM – AUDIT PROGRAM	<p>The applicant is <i>not</i> required to, and should not, submit its audit program to NRC for review during the licensing phase.</p>	<p>Need Not Be Submitted With Application</p>	
10. RADIATION SAFETY PROGRAM – TERMINATION OF ACTIVITIES	<p>The applicant is <i>not</i> required to submit a response to the termination of activities section during the initial application. However, when the license expires when the licensee ceases operation, NRC Form 314 must be submitted.</p>	<p>Need Not Be Submitted With Application</p>	
10. RADIATION SAFETY PROGRAM – SURVEY INSTRUMENTS	<p>We will either possess and use, or have access to and use, a radiation survey meter that meets the Criteria in the section entitled "Radiation Safety Program – Instruments" in NUREG-1556, Vol. 1, Rev. 1, dated November 2001.</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

APPENDIX B

Item No. And Title	Suggested Response	Yes	Alternative Procedures Attached
10. RADIATION SAFETY PROGRAM – MATERIAL RECEIPT AND ACCOUNTABILITY	Physical inventories will be conducted at intervals not to exceed 6 months, to account for all sealed sources and devices received and possessed under the license.	<input checked="" type="checkbox"/>	<input type="checkbox"/>
10. RADIATION SAFETY PROGRAM – OCCUPATIONAL DOSIMETRY	Either we will maintain, for inspection by NRC, documentation demonstrating that unmonitored individuals are not likely to receive a radiation dose in excess of 10 percent of the allowable limits in 10 CFR Part 20, or we will provide dosimetry processed and evaluated by an NVLAP-approved processor that is exchanged at a frequency recommended by the processor.	<input checked="" type="checkbox"/>	<input type="checkbox"/>
10. RADIATION SAFETY PROGRAM – PUBLIC DOSE	The applicant is <i>not</i> required to submit a response to the public dose section during the licensing phase. This matter will be examined during an inspection.		Need Not Be Submitted With Application
10. RADIATION SAFETY PROGRAM – OPERATING AND EMERGENCY PROCEDURES	<p>We will implement and maintain the operating and emergency procedures in Appendix H of NUREG-1556, Vol. 1, Rev. 1, dated November 2001, and provide copies of these procedures to all gauge users and at each job site.</p> <p style="text-align: center;">OR</p> <p>Operating and emergency procedures will be developed, implemented, and maintained and will meet the criteria in the section entitled "Radiation Safety Program – Operating and Emergency Procedures" in NUREG-1556, Vol. 1, Rev. 1, dated November 2001.</p>	<p><input type="checkbox"/></p> <p><input checked="" type="checkbox"/></p>	<input type="checkbox"/>
10. RADIATION SAFETY PROGRAM – LEAK TEST	Leak tests will be performed at intervals approved by NRC or an Agreement State and specified in the Sealed Source and Device Registration Sheet. Leak tests will be performed by an organization authorized by NRC or an Agreement State to provide leak testing services for other licensees or using a leak test kit supplied by an organization authorized by NRC or an Agreement State to provide leak test kits to other licensees and according to the kit supplier's instructions.	<input checked="" type="checkbox"/>	<p><input type="checkbox"/></p> <p>The information in Appendix J supporting a request to perform leak testing and sample analysis is attached.</p>

<u>Manufacturer</u>	<u>Model No.</u>	<u>Serial No.</u>	<u>Sources</u>
HUMBOLDT	5001	200	CS-137 (10 MCI) AM241:BE (40 MCI)
TROXLER	3411-B	5867	CS-137 (8.9 MCI) AM241:BE (40 MCI)
TROXLER	3411-B	7597	CS-137 (7.9 MCI) AM241:BE (40 MCI)
TROXLER	3411-B	8065	CS-137 (8.0 MCI) AM241:BE (40 MCI)
TROXLER	3411-B	10094	CS-137 (8.3 MCI) AM241:BE (40 MCI)
TROXLER	3411-B	11136	CS-137 (8.1 MCI) AM241:BE (40 MCI)
TROXLER	3411-B	12369	CS-137 (8.2 MCI) AM241:BE (40 MCI)
TROXLER	3411-B	13844	CS-137 (8.0 MCI) AM241:BE (40 MCI)
TROXLER	3411-B	14450	CS-137 (8.0 MCI) AM241:BE (40 MCI)
TROXLER	3411-B	14544	CS-137 (8.0 MCI) AM241:BE (40 MCI)
TROXLER	3411-B	14579	CS-137 (8.0 MCI) AM241:BE (40 MCI)
TROXLER	3411-B	15632	CS-137 (8.0 MCI) AM241:BE (40 MCI)
TROXLER	3411-B	15717	CS-137 (8.0 MCI) AM241:BE (40 MCI)
TROXLER	3411-B	15926	CS-137 (8.0 MCI) AM241:BE (40 MCI)
TROXLER	3440	17276	CS-137 (8.0 MCI) AM241:BE (40 MCI)
TROXLER	3430	20778	CS-137 (8.0 MCI) AM241:BE (40 MCI)
TROXLER	3430	23749	CS-137 (8.0 MCI) AM241:BE (40 MCI)
TROXLER	3430	28876	CS-137 (8.0 MCI) AM241:BE (40 MCI)
TROXLER	3430	28878	CS-137 (8.0 MCI) AM241:BE (40 MCI)
TROXLER	3430	33051	CS-137 (8.0 MCI) AM241:BE (40 MCI)
TROXLER	3430	35330	CS-137 (8.0 MCI) AM241:BE (40 MCI)

CERTIFICATE OF RADIOLOGICAL TRAINING

This is to certify that

David R. Mitrik

*has successfully completed the 24-Hour
RADIATION SAFETY OFFICER TRAINING COURSE*

*presented by Applied Health Physics, Inc.
from February 21st through February 23rd, 2000*

Todd Mobley

Todd Y. Mobley
Director, Technical Services

2/23/00

Date



SUMMARY OF NOTIFICATION REQUIREMENTS

<u>ITEM</u>	<u>SECTION AND WHEN REQUIRED</u>	<u>WHOM</u>	<u>METHOD</u>
1) Loss or Theft of Source	20.2201 and/or State Regulation: IMMEDIATELY	Nearest NRC Compliance Office and/or State Agency of Agreement State (whichever is applicable)	Telephone or Telegraph
2.A) Exposure of 25 Rems or more	20.2202 and/or State Regulation: IMMEDIATELY	Nearest NRC Compliance Office, NRC Operations Center and/or State Agency	Telephone or Telegraph
B) Release of Source from Capsule			
C) Loss of any Work Area for 1 Day			
D) Property Damage Over \$200,000			
3.A) Exposure of 5 Rems or more	20.2202 (b) and/or State Regulation: WITHIN 24 HRS.	Nearest NRC Compliance Office, NRC Operations Center and/or State Regulation	Telephone or Telegraph
B) Loss of any Work Area for 1 Day			
C) Property Damage Over \$200,000			
4.A) Any incident in 1, 2 or 3 above			
B) Any other over- exposure			
C) Levels over 10 Times Allowable in unrestricted areas	20.2203(a) and/or State Regulation: WITHIN 30 DAYS	Director, (Div. of State and Licensee Relations) U.S. RC Washington D.C. cc: Nearest NRC Compliance Office and/or State Agency	In writing describing: a) extent of exposure b) Levels of radiation c) Cause d) Corrective steps taken or planned.

Note: If accidents or incidents occur during transportation of radioactive materials, reporting to D.O.T. per 49 CFR, 171.15 and 171.16 may be required.

EMERGENCY PHONE NUMBERS

- 1) Troxler 24 Hours Per Day Emergency Response: 919-839-2676
- 2) NRC Operations Center: 301-816-5100
- 3) U.S. Department of Transportation: 800-424-8802

377/500 12649376

SHIPPER'S DECLARATION FOR DANGEROUS GOODS

(Provide at least two copies to the airline)

Shipper
PSI PITTSBURGH TESTING LAB DIV
850 POPLAR ST
PITTSBURGH PA US 15220

Air Waybill No.
Page 1 of 1 Pages
Shipper's Reference Number

Consignee



Two completed and signed copies of this Declaration must be handed to the operator.

WARNING

Failure to comply in all respects with the applicable Dangerous Goods Regulations may be in breach of the applicable law, subject to legal penalties. This Declaration must not, in any circumstances, be completed and/or signed by a consolidator, a forwarder, or an IATA cargo agent.

TRANSPORT DETAILS

This shipment is within the limitations prescribed for:
(delete non-applicable)

Airport of Departure

PASSENGER AND CARGO AIRCRAFT
 AIRCRAFT ONLY

CARGO AIRCRAFT ONLY

Airport of Destination:

Shipment type: (delete non-applicable)

NON-RADIOACTIVE RADIOACTIVE

NATURE AND QUANTITY OF DANGEROUS GOODS

Dangerous Goods Identification					Quantity and type of packaging	Packing Inst.	Authorization
Proper Shipping Name	Class or Division	UN or ID No.	Pack- ing Group	Subsidiary Risk			
Radioactive Material Special Form R.Q. Non Fissile or Fissile-Excepted	7	UN 3332			CS-137/AM241:BE 8/40mCi .296/1.480GBQ (1) Type A Package	Yellow II T.I. 0,1 DIM 35x41x75cm	

Additional Handling Information

Emergency Telephone Number

1-800-485-6922

I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labelled/placarded, and are in all respects in proper condition for transport according to applicable International and National Governmental Regulations.

Name/Title of Signatory
DAVID R. MITRICK / LAB SUPERVISOR
Place and Date C.E.G. 12/17/01
Signature *David R. Mitrick*
(see warning above)

IF ACCEPTABLE FOR PASSENGER AIRCRAFT, THIS SHIPMENT CONTAINS RADIOACTIVE MATERIAL INTENDED FOR USE IN, OR INCIDENT TO, RESEARCH, MEDICAL DIAGNOSIS, OR TREATMENT.

**RADIATION SAFETY MANUAL
OPERATING & RADIATION SAFETY
PROCEDURE FOR USE OF NUCLEAR
SURFACE MOISTURE DENSITY GAUGES**

PART III

SECTION VII

DATE: January 11, 2005

REVISION: 6

APPROVAL: DRM

7.1.3 Due to the fact that Transport Indexes for density gauges may range from 0.1 to 1.0 mRem/hr., containers may not be stored closer than 12 inches (30 centimeters) to passengers per 49 CFR 177.842. Containers also should not be stored within 1 meter of undeveloped film.

7.2 The following labels are displayed on the transport containers as required by 49 CFR.

- a) Two (2) "Yellow II" labels indicating the contents as: 8 mCi Cs-137, 40 mCi AM-241/Beryllium (172.403, 172.441)
- b) USA DOT 7A
TYPE "A"
RQ, RADIOACTIVE MATERIAL
SPECIAL FORM
NOS UN3332
(172.301, 306, 310, 312, 324)

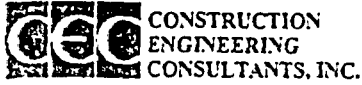
7.3 A "Bill of Lading" certificate must be in the vehicle within sight of the driver's seat at all times along with the CEC Emergency Response Information (i.e., Part III of the CEC Radiation Safety Manual).

The "Bill of Lading" certificate for CEC transport of gauges must comply with 49 CFR 172, subpart C in identifying the following:

- a) The Shipper
- b) Description of the Shipment (proper shipping name, material identification number, hazard class, type of package, name and activity of each nuclide, category of labeling and transport index).
- c) 24-Hour Emergency Response Phone Number
- d) Document must be Signed by the Shipper

7.4 Security of Nuclear Density Gauges Containing Sealed Sources

- a) Each unit will be provided with a lock designed to prevent unauthorized or accidental removal and shall be kept locked at all times except when in use and under the direct surveillance of an operator.
 - 1) Each device containing a sealed source when not in use, shall be stored in a vault container or such other safeguards as may be needed to protect against unauthorized or accidental removal.



RADIATION SAFETY MANUAL

**OPERATING & RADIATION SAFETY
PROCEDURE FOR USE OF
NUCLEAR GAUGES**

PART III

APPENDIX I

DATE: January 11, 2005

REVISION: 2

APPROVAL: DRM

Gauge Serial No.:

Gauge Model No.:

BILL OF LADING

Shipper: Construction Engineering Consultants, Inc.
2018 Waverly Street
Pittsburgh, PA 15218
(412)-351-6465

Consignee: Construction Engineering Consultants, Inc.
Various Temporary Job Sites

**RQ, RADIOACTIVE MATERIAL, SPECIAL FORMS, NOS., UN 3332
CLASS 7, TYPE "A" PACKAGE, CONTAINING:**

CESIUM 137, 8 mCi (0.30 GBq)

AMERICIUM 241: BERYLLIUM, 40 mCi (1.48 GBq)

RADIOACTIVE YELLOW II LABEL, TI=0.1

**24 HOURS PER DAY
EMERGENCY RESPONSE TELEPHONE NO.**

******* (919)-839-2676 *******

This is to certify that the above-named material are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation according to the applicable regulations of the Department of Transportation.

BY: _____
Radiation Safety Officer