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CARPENTER
Specialty Alloys

Carpenter Technology Corporation
P.O. Box 14662
Reading, PA 19612-4662

Tel: 610.208.2000

March 10, 2005

MS 6
P-3

Kathy Dolce Modes
Health Physicist
U.S. Nuclear Regulatory Commission
Region 1
475 Allendale Road
King of Prussia, PA 19406-1415

Subject: Renewal of License #37-08210-01
Docket #030-06185
Control #136271

Dear Ms. Dolce Modes:

Regarding your letter dated February 27, 2005 attached find the checklist from Appendix D in NUREG-1556 Volume 7 with my responses and comments. I am requesting an amendment to place this Niton Unit on our specific license because the isotope it contains is Americium 241. I am informing Niton LLC that I am placing this unit on our Specific License.

Please amend Section #7 of our license by replacing the Kevex information with the Niton information.

Sincerely yours,

Joan I. Fessler
Health & Safety Engineer

Attach.

136271
NMSS/RGN1 MATERIALS-002

**D.1 Item 1: Action Type**

| ACTION TYPE: | ADMINISTRATIVE REVIEW: |
|---|---|
| [ ] New<br>[x] Amendment<br>[ ] Renewal | [ ] Current Guidance Used<br>[ ] References in Application Based On Current Regulations<br>[ ] All Attachments Referenced Included<br>[ ] Signature on Application |

**D.2 Item 2: Legal Identity**

| NAME: Carpenter Technology Corporation Specific License #37-08210-01 |
|---|

**D.3 Items 2 & 3: Address**

| STORAGE & LOCATION OF USE ADDRESS: | MAILING ADDRESS: |
|---|---|
| 101 West Bern Street<br>Reading, PA 19601 | P.O. Box 14662<br>Reading, PA 19612-4662 |
| Temporary Job Sites [ ] YES [x] NO | |

**D.4 Item 4: Person to Be Contacted about this Application**

| CONTACT PERSON: Joan I. Fessler |
|---|
| TELEPHONE NUMBER: (610) 208-2457 |

**D.5 Items 5 & 6: Materials to Be Possessed and Proposed Uses**

| Yes | No | Radioisotope | Mfg/model No. | Quantity | Purpose of Use | Specify Other Uses Not Listed on SSD Certificate |
|---|---|---|---|---|---|---|
| | | Hydrogen-3[1] | Sealed sources in a compatible device as specified in Sealed Source and Device Registration Sheet | Not to exceed maximum activity per source as specified in Sealed Source and Device Registration Sheet | Measure Physical Properties of Materials | [ ] Not applicable<br>[ ] Uses are: |
| | | Nickel-63 | Sealed sources in compatible device as specified in Sealed Source and Device Registration Sheet | Not to exceed maximum activity per source as specified in Sealed Source and Device Registration Sheet | Measure Physical Properties of Materials | [ ] Not applicable<br>[ ] Uses are: |
| X | | Americium-241 Model AMCL | Sealed sources in compatible device as specified in Sealed Source and Device Registration Sheet for Niton LLC Xli/XLp | Not to exceed maximum activity per source as specified in Sealed Source and Device Registration Sheet | Measure Physical Properties of steel ie chemical analysis | [ ] Not applicable<br>[X ] Uses are:<br>Per SSD MA-1156-D-101-B |

**D.6 Items 7 Through 11: Training and Experience, Facilities and Equipment, Radiation Safety Program, and Waste Disposal**

| Item No. | Title and Criteria | Yes | Description Attached |
|---|---|---|---|
| 7 | **INDIVIDUAL(S) RESPONSIBLE FOR RADIATION SAFETY PROGRAM AND THEIR TRAINING EXPERIENCE**<br>**RSO**<br><br>Name: Joan Fessler<br><br>Before obtaining licensed materials, the proposed RSO will have successfully completed the training described in Appendix D, in NUREG - 1556, Vol. 7.<br>Training per prior Specific License conditions. | [x] | [ ] |
| 8 | **TRAINING FOR INDIVIDUALS WORKING IN OR FREQUENTING RESTRICTED AREAS**<br><br>Individuals working under the supervision of a responsible person named in item 7, above, are not required to have any specific radiation safety training prior to using a GC/XRF. | N/A | |
| 9 | **FACILITIES AND EQUIPMENT**<br><br>Describe the facilities where GC/XRFs will be used and stored.<br>Licensed material will be used at 101 West Bern Street location only and will be locked in cabinet when not in use. | Submit description with application. | |
| 10 | **RADIATION SAFETY PROGRAM**<br><br>**Audit Program**<br>The applicant is not required to, and should not, submit its audit program to the NRC for review during the licensing phase. | N/A | |
| | **Survey Instruments**<br>If the applicant proposes to perform operations that involve the removal of sources from the device or maintenance and repair of a device that involves the source, we will possess or have access to a radiation survey meter that meets the requirements in the procedures for performing removal or repair of the sources.<br>We have a radiation survey meter. | [x] | [ ] |
| | **Material Receipt and Accountability**<br>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. | [x] | [ ] |

| Item No. | Title and Criteria | Yes | Description Attached |
|---|---|---|---|
| | **RADIATION SAFETY PROGRAM *(Cont'd)*** | | |
| 10 | **Occupational Dosimetry**<br>No personnel monitoring is required if proposed use does not involve the removal of sources from the device or any maintenance and repair of a device that involves the source. | [x] | |
| | **Public Dose**<br>The applicant is not required to submit a response to the public dose section during the licensing phase. This matter will be examined during an inspection. | N/A | |
| | **Leak Test**<br>Leak tests will be performed at intervals specified in the Sealed Source and Device Registration Certificate. 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. | [x] | [ ] |
| | **Maintenance**<br>If authorization has been requested to perform the maintenance and repair operations described in Item 7, state in the application that the written procedures provided by the device manufacturer will be followed for each such operation requested.<br>Manufacturer guidelines are followed or unit is returned to the manufacturer for maintenance or repair. | [x] | |
| | **Transportation**<br>The applicant is not required to submit its response to transportation during the licensing process; however, this issue will be reviewed during inspection. | N/A | |
| | **Minimization of Contamination**<br>The applicant is not required to submit a response to the minimization of contamination section if the applicant's responses meet the criteria for the following sections: "Radiation Safety Program - Leak Tests," "Facilities and Equipment," and "Waste Management." | N/A | |
| 11 | **WASTE MANAGEMENT** | N/A | |
| | **GC/XRFs Disposal & Transfer**<br>The applicant is not required to submit a response to waste management during the licensing process. The licensee should, however, develop, implement, and maintain GC/XRF transfer and disposal procedures in its radiation safety program. | | |

Signature: [signature] Date: March 10, 2005