



August 21, 2001

RECEIVED  
NEWTON 1

FILE COPY

2001 AUG 22 11:00

03017514  
37-19378-01

Dr. Sattar Lodhi  
US Nuclear Regulatory Commission  
475 Allendale Road  
King of Prussia, PA 19406-1415

Re: Control No. 129409, Response to NRC letter dated July 31, 2001

Dear Dr. Lodhi:

The following responses address the items in your letter dated July 31, 2001.

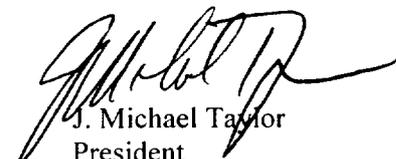
1. The correct legal name and address is:

Lionville Laboratory Incorporated  
208 Welsh Pool Road  
Exton, PA 19341-1313

2. The only form of radioactive material necessary under this license is "environmental and analytical samples."
3. At this time, we are requesting to continue our specific license for 10 millicuries of source material. At some point in the future, we may renew our request to delete the source material authorization from our specific license.
4. Attached is the documentation requested for the return of all specifically licensed ECD's to the manufacturer.
5. We confirm that the procedures on page 11, item 10.11.1 are the acquisition of ECD's under general license.
6. We confirm that our waste disposal procedures will be in accordance with regulations in 10 CFR for licensed material. Since licensed material is not defined in the regulations, section 11.1 of our application defines when samples are classified as licensed material. Given that most soils contain detectable levels of cesium-137, carbon-14, tritium, uranium and others when utilizing state of the art analytical capabilities, as a practical matter, the laboratory must determine when a sample is classified as licensed material.

Sincerely,

Lionville Laboratory Incorporated

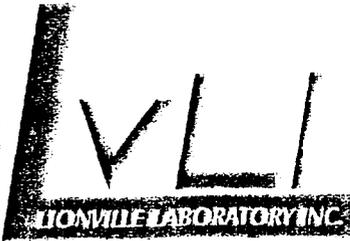


J. Michael Taylor  
President

129409

**NMSS/RGNI MATERIALS-002**

sm\lvli\us nuclear regulatory commission  
8/21/01



Agilent Technologies, Inc.  
Attention: ECD LAB  
2850 Centerville Road  
Wilmington, DE 19808-1610

May 31, 2001

To whom it may concern,

Enclosed are two Hewlett-Packard ECD's (Model 19235). Please transfer the ECD's to a general license and return them to the following address within one week:

Lionville Laboratory, Inc.  
Attention: Dustin Walker  
208 Welsh Pool Rd.  
Lionville, PA 19341

The ECD serial numbers are: L1133 and L6602. Billing can be referenced to purchase order # 12930.

Sincerely,

Iain Daniels,  
Laboratory Manager,  
Lionville Laboratory, Inc.  
Phone: (610) 280-3014  
Fax: (610) 280-3041

Tracking # 493707195439

# Packing List



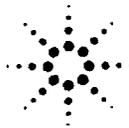
Agilent Technologies  
Knowing the HP Way

CUSTOMER INFORMATION		SHIPPER INFORMATION	
<b>Ship To:</b>	Lionville Laboratory Inc 208 Welsh Pool Rd EXTON, PA 19341-1313	<b>Shipped From:</b>	Little Falls Division LFAD 2850 Centerville Road WILMINGTON, DE 19808
<b>Deliver To:</b>	IAIN DANIELS 610 280 3014	<b>Agilent Order No:</b>	Multi - See Item Level Detail.
<b>Cust. P.O.:</b>	Multi - See Item Level Detail.	<b>Agilent Delivery No:</b>	670002812
<b>Sold To:</b>	Lionville Laboratory Inc 208 Welsh Pool Rd EXTON, PA 19341-1313	<b>Carrier Ref. No:</b>	463581149110
<b>Attention:</b>		<b>Carrier:</b>	AE FEDERAL EXPRESS CORPORATION
		<b>Ship Date:</b>	06/04/2001

**ATTENTION RECEIVING PERSONNEL! In case of concealed or obvious damage:**  
 1) Save all packaging materials 2) Contact the delivering Carrier for inspection 3) Contact the nearest Agilent Technologies sales office

Order Item	Delivery Item	Quantity	Product Number	Product Description	Box Weight	Box Number
10	10	1	19233-69570	RP-Rebuilt -60570 ECD Assy	3.3	2340-40570
20	20	1	19233-69570	RP-Rebuilt -60570 ECD Assy	3.3	2340-40570

Agilent Technologies  
E.C.D. Exchange Program  
Little Falls Site  
2850 Centerville Road  
Wilmington, DE 19808-1610  
USA



**Agilent Technologies**  
Innovating the HP Way

**Certificate for Sealed Radioactive Source**  
Serial No. L1133  
Detector Model No. 19283-64570

## Characteristics of the Sealed Source

Identification  
  
Radioelement - <sup>63</sup>Ni  
28

Source Plated by :  
Amersham International plc  
Buckinghamshire, England HP7911  
  
Or  
Dupont Merck Pharmaceutical Co.  
North Billerica, Massachusetts 01862

ANSI N542 Classification 77C32211 (Equivalent to ISO 2919 Classification, C32211)  
TYPICAL ACTIVITY: 500 MBq or 13.2 millicuries.

Nominal dimensions of the active part of the detector:  
Inside diameter: 1.2 cm  
Height: 1cm  
Maximum activity (not to exceed): 555 MBq or 15 millicuries

## Verification Tests

**Pressurization Leak Test:**  
The ECD was pressurized to 16 psi and the leak rate was less than 0.6 psi per minute.  
Date of test: 6-4-01 Analyst's Signature J. D. [Signature]

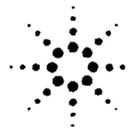
**Final Wipe Test:**  
The ECD was tested for surface contamination by means of a wipe test followed by liquid scintillation counting, and the value obtained did not exceed 20 Bq (0.54nCi).  
Date of test: 6-4-01 Analyst's Signature J. D. [Signature]

We certify that this sealed source complies with requirements of ANSI N542 and that the above information is correct.

**Attention: Do not discard this document!**

Revision 5-00  
Part No. 5955-9036

Agilent Technologies  
E.C.D. Exchange Program  
Little Falls Site  
2850 Centerville Road  
Wilmington, DE 19808-1610  
USA



**Agilent Technologies**  
Innovating the HP Way

**Certificate for Sealed Radioactive Source**  
Serial No. L6602  
Detector Model No. 19233-69570

## Characteristics of the Sealed Source

Identification	
Radioelement -	Ni
	63
	28

Source Plated by :  
Amersham International plc  
Buckinghamshire, England HP7911

Or

Dupont Merck Pharmaceutical Co.  
North Billerica, Massachusetts 01862

ANSI N542 Classification 77C32211 (Equivalent to ISO 2919 Classification, C32211)  
TYPICAL ACTIVITY: 500 MBq or 13.2 millicuries.

Nominal dimensions of the active part of the detector:  
Side diameter: 1.2 cm  
Height: 1cm  
Maximum activity (not to exceed): 555 MBq or 15 millicuries

## Verification Tests

**Pressurization Leak Test:**  
The ECD was pressurized to 16 psi and the leak rate was less than 0.6 psi per minute.  
Date of test: 6-4-01 Analyst's Signature J. Lawrence

**Final Wipe Test:**  
The ECD was tested for surface contamination by means of a wipe test followed by liquid scintillation counting, and the value obtained did not exceed 20 Bq (0.54nCi).  
Date of test: 6-4-01 Analyst's Signature J. Lawrence

We certify that this sealed source complies with requirements of ANSI N542 and that the above information is correct.

**Attention: Do not discard this document!**

Revision 5-00  
Part No. 5955-9036

# GENERAL LICENSE REGISTRATION FORM

Note: For U.S. customers, Agilent Technologies, Inc. must have this certification on file before the Electron Capture Detector (ECD) will be sold or shipped. Please read the information below, complete the requested information, and sign where indicated. Please note that the person designated as the End User must be the person identified by the General Licensee as having responsibility for having knowledge of the appropriate regulations and requirements and having the authority for taking required actions to comply with appropriate regulations and requirements as defined in NRC Regulations 10 CFR Section 31.5 (c) (12) (enclosed).

The undersigned End User hereby certifies that he/she will adhere to the regulatory requirements in the enclosed NRC Regulations 10 CFR 20.2201, 20.2202, 30.51, 31.2, and 31.5. The undersigned also accepts responsibility for the operation and maintenance of the ECD in a safe manner lying beyond the manufacturer's control.

Check one:  New ECD      FAX this page only to (302) 633-8901  
 Rebuilt ECD      FAX this page only to (302) 993-5425

Date: 5/31/01

ECD Model Number:

G2397A (6890 GC)       G1533A (6890 GC)  
 G1223A (5890 GC)       19233 (5890 GC)  
 19312 (5880 GC)

Sales Order Number: \_\_\_\_\_

Customer Purchase Number: 12930

End User's Name: (Printed) JAIN DANIELS (Signature) 

End User's Title: LAB MANAGER Telephone Number: 610 282 3014

Company Name: Lionville Laboratory, Inc.

Address: 208 Welsh Pool Rd.

Lionville, PA 19341

B4533



Agilent Technologies, Inc.  
 Attention: ECD LAB  
 2850 Centerville Road  
 Wilmington, DE 19808-1610

May 31, 2001

To whom it may concern,

Enclosed is one Hewlett-Packard ECD (Model 19303; Serial # S10743). Please dispose of the ECD and send the disposal confirmation to:

Lionville Laboratory, Inc.  
 Attention: Dustin Walker  
 208 Welsh Pool Rd.  
 Lionville, PA 19341

Billing can be referenced to purchase order # 12931. The invoice can be sent to:

Lionville Laboratory, Inc.  
 Attention: Joe O'Brien  
 208 Welsh Pool Rd.  
 Lionville, PA 19341

Sincerely,

Dustin A. Walker  
 Health and Safety Officer  
 Lionville Laboratory, Inc.

Serial no

S10743

19303-69550

Spec

6-4-01

JM

AK

6-4-01

Agilent Technologies Inc.  
Little Falls Site  
2860 Centerville Road  
Wilmington, DE 19808-1610

302 633 8000 phone  
302 993 5925 fax



June 4, 2001

Lionville Laboratory  
208 Welsh Pool Road  
Lionville, PA 19341

Attn: Dustin Walker

Re: Acknowledgment of Receipt of Electron Capture Detector

Dear Customer,

This is to acknowledge that Electron Capture Detector(s), Serial Number(s),  
S10743 \_\_\_\_\_  
were received on 06/04/01 and are in possession of Agilent Technologies Inc.,  
Wilmington, DE U.S.A.

Sincerely yours,

*Rhonda S. Payne*  
Agilent Technologies Inc.  
NRC License No. 07-28762-01

**“CUSTOMERS MUST NOTIFY THEIR INDIVIDUAL STATE  
REGULATORY AGENCY AND REGULATORY OFFICE OF THIS  
TRANSACTION”**



Thermo-Finnigan  
2215 Grand Avenue Parkway  
Austin, TX 78728-3812  
ATTN: SRC # 2129T

May 31, 2001

To whom it may concern,

Enclosed are two Fisons ECD's, serial numbers 252624 and 252747. Please dispose of the ECD's and send the disposal confirmation to:

Lionville Laboratory, Inc.  
Attention: Dustin Walker  
208 Welsh Pool Rd.  
Lionville, PA 19341

Billing can be referenced to purchase order # 12929. The invoice can be sent to:

Lionville Laboratory, Inc.  
Attention: Joe O'Brien  
208 Welsh Pool Rd.  
Lionville, PA 19341

Sincerely,

Dustin A. Walker  
Health and Safety Officer  
Lionville Laboratory, Inc.

Tracking # 493707195601

# REPORT OF DISPOSAL OF BYPRODUCT MATERIAL PER STANDARD G.E. INSTRUMENTS PROCEDURES

NAME OF VENDOR: ThermoQuest / G.E. INSTRUMENTS

2215 Grand Ave Parkway

Austin Texas 78728 512-251-1400

Texas license L01186 amendment 39 expires 04/30/2001

## LICENSEE INFORMATION

Company Name

Lionville Labs

208 Welsh Pool Rd

Lionville

PA

19341

## PERSON RESPONSIBLE FOR CONTROL OF DEVICE

Dustin Walker

610-280-3000

MODEL: 115500

SERIAL NUMBER

252747

ISOTOPE(S)

This device contains less than 15 mc

THIS DEVICE WAS RECEIVED FOR DISPOSAL ON

6/1/01

THIS DEVICE WAS PROCESSED FOR DISPOSAL ON

6/25/01

RADIATION SAFETY OFFICER

*Carlton Loring*  
Carlton Loring

DVP

# REPORT OF DISPOSAL OF BYPRODUCT MATERIAL PER STANDARD GE INSTRUMENTS PROCEDURES

NAME OF VENDOR: ThermoQuest/GE INSTRUMENTS

2211 Sand Ave Parkway

Austin, Texas 78728 512-251-1400

Texas License: L01186 amendment: 99 expires 04/30/2001

### LICENSEE INFORMATION

Company Name:

Lionville Labs

208 Welsh Pool Rd

Lionville

PA

19341

### PERSON RESPONSIBLE FOR CONTROL OF DEVICE

Dustin Walker

610-280-3000

MODEL: 115500

SERIAL NUMBER: 252624

ISOTOPE NUGS:

This device contains less than 15 mc

THIS DEVICE WAS RECEIVED FOR DISPOSAL ON:

6/1/01

THIS DEVICE WAS PROCESSED FOR DISPOSAL ON:

6/25/01

RADIATION SAFETY OFFICER

*Carlton Loring*

DATE

6/25/01

Carlton Loring

Report Run Date : 06/01/2001  
Report Run Time : 15:27

Tracking #	POD City	State	Signature	Date	Time	DL	SVC EX	COD	RETURN
193707195601	Y AUSTIN	TX	P.VARNER	06/01/2001	09:19				PO
193707195612	Y NEW CASTLE	DE	S.GLASCO	06/01/2001	08:40				PO
193707195439	Y NEW CASTLE	DE	S.GLASCO	06/01/2001	08:40				PO

TOTAL PACKAGES TRACKED : 3  
PACKAGES WITH AN EXCEPTION : 0  
PACKAGES NOT SCANNED : 0

Add 90 minutes to normal commitments for FedEx Priority overnight C.O.D.'s for AA and AM destination.  
A Delivery location (DL) code of 'R' represents a residential delivery; residential delivery commitments may vary.