

NRC FORM 313  
(4-2004)  
10 CFR 30, 32, 33,  
34, 35, 36, 39, and 40

U.S. NUCLEAR REGULATORY COMMISSION

APPROVED BY OMB: NO. 3150-0120

EXPIRES: 10/31/2005

Estimated burden per response to comply with this mandatory collection request: 7 hours. Submittal of the application is necessary to determine that the applicant is qualified and that adequate procedures exist to protect the public health and safety. Send comments regarding burden estimate to the Records and FOIA/Privacy Services Branch (T-5 F52), U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001, or by internet e-mail to infocollects@nrc.gov, and to the Desk Officer, Office of Information and Regulatory Affairs, NEOB-10202, (3150-0120), Office of Management and Budget, Washington, DC 20503. If a means used to impose an information collection does not display a currently valid OMB control number, the NRC may not conduct or sponsor, and a person is not required to respond to, the information collection.

APPLICATION FOR MATERIAL LICENSE

INSTRUCTIONS: SEE THE APPROPRIATE LICENSE APPLICATION GUIDE FOR DETAILED INSTRUCTIONS FOR COMPLETING APPLICATION. SEND TWO COPIES OF THE ENTIRE COMPLETED APPLICATION TO THE NRC OFFICE SPECIFIED BELOW.

APPLICATION FOR DISTRIBUTION OF EXEMPT PRODUCTS FILE APPLICATIONS WITH:

DIVISION OF INDUSTRIAL AND MEDICAL NUCLEAR SAFETY  
OFFICE OF NUCLEAR MATERIALS SAFETY AND SAFEGUARDS  
U.S. NUCLEAR REGULATORY COMMISSION  
WASHINGTON, DC 20555-0001

ALL OTHER PERSONS FILE APPLICATIONS AS FOLLOWS:

IF YOU ARE LOCATED IN:

ALABAMA, CONNECTICUT, DELAWARE, DISTRICT OF COLUMBIA, FLORIDA, GEORGIA, KENTUCKY, MAINE, MARYLAND, MASSACHUSETTS, MISSISSIPPI, NEW HAMPSHIRE, NEW JERSEY, NEW YORK, NORTH CAROLINA, PENNSYLVANIA, PUERTO RICO, RHODE ISLAND, SOUTH CAROLINA, TENNESSEE, VERMONT, VIRGINIA, VIRGIN ISLANDS, OR WEST VIRGINIA, SEND APPLICATIONS TO:

LICENSING ASSISTANCE TEAM  
DIVISION OF NUCLEAR MATERIALS SAFETY  
U.S. NUCLEAR REGULATORY COMMISSION, REGION I  
475 ALLENDALE ROAD  
KING OF PRUSSIA, PA 19406-1415

IF YOU ARE LOCATED IN:

ILLINOIS, INDIANA, IOWA, MICHIGAN, MINNESOTA, MISSOURI, OHIO, OR WISCONSIN, SEND APPLICATIONS TO:

MATERIALS LICENSING BRANCH  
U.S. NUCLEAR REGULATORY COMMISSION, REGION III  
2443 WARRENVILLE ROAD, SUITE 210  
LISLE, IL 60532-4352

ALASKA, ARIZONA, ARKANSAS, CALIFORNIA, COLORADO, HAWAII, IDAHO, KANSAS, LOUISIANA, MONTANA, NEBRASKA, NEVADA, NEW MEXICO, NORTH DAKOTA, OKLAHOMA, OREGON, PACIFIC TRUST TERRITORIES, SOUTH DAKOTA, TEXAS, UTAH, WASHINGTON, OR WYOMING, SEND APPLICATIONS TO:

NUCLEAR MATERIALS LICENSING BRANCH  
U.S. NUCLEAR REGULATORY COMMISSION, REGION IV  
611 RYAN PLAZA DRIVE, SUITE 400  
ARLINGTON, TX 76011-4005

03010179  
X

PERSONS LOCATED IN AGREEMENT STATES SEND APPLICATIONS TO THE U.S. NUCLEAR REGULATORY COMMISSION ONLY IF THEY WISH TO POSSESS AND USE LICENSED MATERIAL IN STATES SUBJECT TO U.S. NUCLEAR REGULATORY COMMISSION JURISDICTIONS.

1. THIS IS AN APPLICATION FOR (Check appropriate item)

A. NEW LICENSE

B. AMENDMENT TO LICENSE NUMBER \_\_\_\_\_

C. RENEWAL OF LICENSE NUMBER 06-09045-03

2. NAME AND MAILING ADDRESS OF APPLICANT (include ZIP code)

Trinity College  
c/o Dr. Kathleen Archer  
Dept. Biology, 300 Summit St.  
Hartford, CT 06106

3. ADDRESS WHERE LICENSED MATERIAL WILL BE USED OR POSSESSED

Trinity College  
300 Summit St.  
Hartford, CT 06106

4. NAME OF PERSON TO BE CONTACTED ABOUT THIS APPLICATION

Dr. Kathleen Archer

TELEPHONE NUMBER

(860) 297-2226

SUBMIT ITEMS 5 THROUGH 11 ON 8-1/2 X 11" PAPER. THE TYPE AND SCOPE OF INFORMATION TO BE PROVIDED IS DESCRIBED IN THE LICENSE APPLICATION GUIDE.

5. RADIOACTIVE MATERIAL

a. Element and mass number; b. chemical and/or physical form; and c. maximum amount which will be possessed at any one time.

6. PURPOSE(S) FOR WHICH LICENSED MATERIAL WILL BE USED.

7. INDIVIDUAL(S) RESPONSIBLE FOR RADIATION SAFETY PROGRAM AND THEIR TRAINING EXPERIENCE.

8. TRAINING FOR INDIVIDUALS WORKING IN OR FREQUENTING RESTRICTED AREAS.

9. FACILITIES AND EQUIPMENT.

10. RADIATION SAFETY PROGRAM.

11. WASTE MANAGEMENT.

12. LICENSE FEES (See 10 CFR 170 and Section 170.31)

|              |     |                 |           |
|--------------|-----|-----------------|-----------|
| FEE CATEGORY | 3 L | AMOUNT ENCLOSED | \$ 640.00 |
|--------------|-----|-----------------|-----------|

13. CERTIFICATION. (Must be completed by applicant) THE APPLICANT UNDERSTANDS THAT ALL STATEMENTS AND REPRESENTATIONS MADE IN THIS APPLICATION ARE BINDING UPON THE APPLICANT.

THE APPLICANT AND ANY OFFICIAL EXECUTING THIS CERTIFICATION ON BEHALF OF THE APPLICANT, NAMED IN ITEM 2, CERTIFY THAT THIS APPLICATION IS PREPARED IN CONFORMITY WITH TITLE 10, CODE OF FEDERAL REGULATIONS, PARTS 30, 32, 33, 34, 35, 36, 39, AND 40, AND THAT ALL INFORMATION CONTAINED HEREIN IS TRUE AND CORRECT TO THE BEST OF THEIR KNOWLEDGE AND BELIEF.

WARNING: 18 U.S.C. SECTION 1001 ACT OF JUNE 25, 1948 62 STAT. 749 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.

CERTIFYING OFFICER -- TYPED/PRINTED NAME AND TITLE

Dr. Frank Kirkpatrick, Dean of Faculty

SIGNATURE

*Frank Kirkpatrick*

DATE

6-8-05

FOR NRC USE ONLY

| TYPE OF FEE | FEE LOG | FEE CATEGORY | AMOUNT RECEIVED | CHECK NUMBER | COMMENTS |
|-------------|---------|--------------|-----------------|--------------|----------|
|             |         |              | \$              |              |          |
| APPROVED BY |         |              |                 | DATE         |          |

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Renewal for License # 06-09045-03**

K. Archer, RSO

**5. Radioactive Material**

**A. Unsealed sources**

| <b>Element and mass number</b> | <b>Chemical and/or physical form</b> | <b>Maximum amount possessed at any one time</b> |
|--------------------------------|--------------------------------------|---|
| Hydrogen 3                     | Any                                  | 100 mCi   |
| Carbon 14                      | Any                                  | 80 mCi  |
| Phosphorus 32                  | Any                                  | 15 mCi  |
| Sulfur 35                      | Any                                  | 20 mCi  |
| <b>TOTAL</b>                   |                                      | <b>215 mCi</b>                                  |

Note: Our current license includes the following isotopes not requested here: 45-Ca, 125-I, 131-I. We do not currently have any authorized users who anticipate needing these isotopes, and so we would like to have them removed from our license.

**B 1. Sealed sources - isotope totals**

| <b>Element and mass number</b> | <b>Chemical and/or physical form</b> | <b>Maximum amount possessed at any one time</b> |
|--------------------------------|--------------------------------------|---|
| 60-Co                          | sealed                               | 8.91 uCi  |
| 137-Cs                         | sealed                               | 31 uCi  |
| 137-Cs/Ba isotope generator    | sealed                               | < 10 uCi  |
| 137-Cs / 65-Zn mixture         | sealed                               | 0.5 uCi / 1 uCi                                 |
| 90-Sr                          | sealed                               | 0.7 uCi   |
| <b>TOTAL</b>                   |                                      | <b>52.11 uCi</b>                                |

Note: The sealed sources above are not listed on previous licenses. They represent sealed sources used in Physics laboratory exercises for students, and are stored in locked safes in the Physics Department. Because the previous RSO at Trinity did not list them, the current RSO (K. Archer) was unaware of their existence until the death of

**Table 5 B-2. Sealed sources with model #s and manufacturers**

| <b>Element and atomic #</b> | <b>Number of sealed disks</b> | <b>Amount</b> | <b>Manufacturer and model #</b>                     |
|-----------------------------|-------------------------------|---------------|---|
| 60-Co                       | 6                             | 1.0 uCi each  | Model # RSS-5, Spectrum Technologies, Oak Ridge, TN |
|                             | 1                             | 1.0 uCi       | Model RSS-8, Spectrum Technologies, Oak Ridge, TN   |
|                             | 1                             | 0.91 uCi      | No model #, New England Nuclear, Boston, MA         |
|                             | 1                             | 1.0 uCi       | No model #, The Nucleus, Oak Ridge, TN              |
|                             |                               |               |   |
| 137-Cs                      | 6                             | 5.0 uCi each  | Model # RSS-5, Spectrum Technologies, Oak Ridge, TN |
|                             | 1                             | 1.0           | Model RSS-8, Spectrum Technologies, Oak Ridge, TN   |
| 137-Cs/Ba isotope generator | 1                             | < 10 uCi      | No model #, Spectrum Technologies, Oak Ridge, TN    |
| 90-Sr                       | 6                             | 0.1 uCi each  | Model # RSS-5, Spectrum Technologies, Oak Ridge, TN |
|                             | 1                             | 0.1           | No model #, The Nucleus, Oak Ridge, TN              |
| 137-Cs/65-Zn mix            | 1                             | 0.5/1.0 uCi   | Model RSS-8, Spectrum Technologies, Oak Ridge, TN   |

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**Renewal for License # 06-09045-03**

a Physics Department faculty member, and the subsequent cleanup of his laboratory, brought them to light. Please see the attached table (Table 5 B-2) which lists individual disk sources with their manufacturers and model numbers.

**6. Purpose for which licensed material will be used.**

Research and development as defined in 10 CFR 30.4, and education.

**7. Individuals responsible for radiation safety program.**

**Executive Management:** Dean of Faculty

The RSO reports directly to the Dean of Faculty. The RSO prepares narrative reports on an annual basis, covering the inventory, the internal audit, any accidents or spills, any other issues of concern.

**Radiation Safety Officer:** Dr. Kathleen Archer

**Training**

Radiation Safety Officer Course presented by Engelhardt and Associates, Inc. Forty hours of training on May 17 - 21, 1999, in Madison, WI.

**Experience**

Used radionuclides in biological research during graduate work (1979-1984), post-doctoral work (1984-1990), and as primary investigator (1990 - present). Experienced in use of 3-H, 14-C, 35-S, and 32P.

**RSO Duties and Responsibilities**

The Radiation Safety Officer is responsible for implementing the radiation safety program and for reviewing the radiation safety program in annual audits. The RSO has full access to all activities involving the use of radionuclides, and the authority to terminate any activity in which health and safety appear to be compromised. Duties include supervision of the following:

- a. Monitoring areas in which radioactive material is used
- b. Overseeing the ordering and reception of radioactive material
- c. Preparing radioactive waste for shipment to offsite disposal.
- d. Monitoring exposure to radiation and insuring exposure is within permissible limits
- e. Training of personnel
- f. Managing radioactive waste disposal
- g. Maintaining inventory and leak tests of sealed sources
- h. Decontamination
- i. Investigation of spills and responding to emergencies
- j. Maintaining records.

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**Renewal for License # 06-09045-03**

**Delegation of Authority**

Trinity College is committed to keeping exposure to ionizing radiation as low as reasonably achievable (the ALARA concept). In keeping with this commitment, the College delegates authority to the RSO for implementing the ALARA concept in the College's radiation safety program (see "Delegation of Authority" document).

**Criteria for approval of new users and uses**

Principle investigators (usually faculty) who wish permission to use radioisotopes, or to supervise the use of radioisotopes, must obtain authorization from the RSO. The applicant must have prior training in radiation safety and should provide a written description of this training and all prior experience with isotope use. If the applicant has no prior radiation safety training or experience, the RSO will require training sessions sufficient to insure that the applicant understands proper safety and handling of isotopes, and adheres to the ALARA concept.

For authorization as a temporary radiation worker (generally a student), the applicant must receive appropriate training in the safe use of the isotope to be used in the teaching exercise or research project by the supervising principle investigator (faculty member), or by the RSO.

**8. Training for Radiation Workers**

The training model is based on NUREG 1556 vol. 7.

**A. Principle Investigators (Faculty)**

Training will cover the topics listed in 10 CFR Part 19.12(a) "Instructions to Workers" and will include:

- Radiation theory
- Biological effects of exposure
- Practical protection
- Hands-on use of radioactive materials
- Handling emergencies
- Regulations

Training sessions will be provided annually, either by the RSO, or by attendance at courses provided by commercial radiation safety consultants. Training will take the form of lectures, hands-on demonstrations, and/or self-study. Training success will be assessed by examination.

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**B. Temporary Radiation Workers (Students)**

Training by the Principle Investigator or the RSO will occur prior to use of radioactive material by the applicant, and will be refreshed annually. Topics will include:

- Radiation theory
- Biological effects of exposure
- Practical protection
- Hands-on use of radioactive materials
- Handling emergencies
- Regulations

Training success will be assessed by examination.

**C. Ancillary workers**

Radiation use at Trinity College is low-level and no area of the Life Sciences building has access restricted from ancillary workers except for the waste storage room (B-28). Ancillary workers (custodial staff, etc.) who enter labs where radiation is stored or used will be given instruction on what radiation is, what the radiation symbol means, what health effects are associated with exposure, and information on how to protect themselves. They will be instructed on how to work in rooms that contain radiation materials, and what to do in an emergency.

**9. Facilities and Equipment**

Unsealed radioactive isotopes are used in research and teaching laboratories in the Life Sciences Building. Labs feature linoleum tile floors, non-absorbent benchtops and seamless construction sinks. They are equipped with fume hoods which are calibrated annually to insure minimum flow rates of 100 fpm. The rooms are secured with both keyed and electronic locks, and can be opened by entering a code assigned uniquely to each individual with authorization to enter the room.

Sealed sources are stored in the MCEC building in room 224. The room is secured by lock, and the sources are stored in a locked safe or locked steel cabinet.

Waste that is in storage-to-decay, and waste being held prior to shipment is stored in Life Sciences B-28 in the basement. The floor is linoleum tile, and the door is secured with a keyed lock. Only the RSO and Environmental Health and Safety Manager have keys.

In the IAIA classification scheme of toxicity, our facility uses unsealed isotopes in

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the moderate to low groups (Group 3 and Group 4).

Included in this application are diagrams showing floor plan, fume hoods, and the location of radiation work spaces and storage.

**10. Radiation Safety Program**

**Audit Program**

**Management and radiation safety audits**

Executive management receives annual reports of the audits. Periodically, the RSO will meet with executive management to brief them on the radiation safety program, remind them of NRC regulations and any issues of concern. Executive management will be periodically invited to tour the facilities where radioisotopes are used.

**Internal audit**

The RSO conducts internal audits on an annual basis. Inventory and survey records are checked, waste records reviewed, signage checked, training records checked, receipt records checked, work areas inspected. A narrative report is prepared for the executive management.

**Record-keeping**

Records of audits are retained on file.

**Radiation Monitoring Equipment**

Monitoring equipment resides with the RSO and is loaned to authorized users during experiments. RSO is responsible for insuring maintenance and annual calibration. We have two Geiger-type monitors (Ludlum Model 14C, and RPI Rad-Monitor 9000-GMI). They are calibrated annually by a private calibration company (RSA Laboratories, NRC License # 06-30007-01, expiration April 30, 2013). The monitors are used to monitor experiments whenever 32-P, 35-S and 14-C isotopes are being used. We have a scintillation counter (RackBeta) for monitoring wipe tests and 3-H isotope use and quantitating 14-C, 35-S and 32-P. The instrument is inspected and calibrated annually by service contract people.

**Material Receipt and Accountability**

The RSO oversees centralized reception of all radioisotope. Shipments are delivered directly to the Life Sciences building, not to a central receiving facility, and no shipments are received on Saturday or Sunday. A written log is kept of every incoming package of radioisotope, along with the record of the package survey for leakage. Each Authorized Principle Investigator is responsible for

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maintaining a running inventory of use, and for insuring that stock containers of isotope are stored in a secure room.

**Occupational Dose**

Trinity adheres to the NRC regulations for occupational dose limits. Dosimetry is not used for the isotopes 3-H, 14-C, 35-S because their beta emissions are not of sufficient energy to be detected by dosimeters. We expect to use ring badges for workers using 32-P in amounts of 5 mCi or more, based on the recommendations of Schiager, et al., 1996 (Health Physics 71(6):960-965; "Consensus radiation protection practices for academic research institutions". Generally, 32-P is used in quantities 0.5 mCi or less, and for these amounts badge dosimeters are not required.

**Public Dose**

The dose likely to be received by a member of the public was estimated with wall dosimeters stationed outside the B-28 storage room, and on the wall near the storage refrigerator in LSC 248. Dosages were at or near background, and were no more than 8 mrem/month.

**Safe Use of Radionuclides and Emergency Procedures**

We will adopt the procedures for the safe use of radionuclides and emergencies as published in Appendix R of NUREG-1556, Volume 11, "Program-Specific Guidance About Licenses of Broad Scope."

**Surveys**

Procedures to evaluate radiological hazard

We will survey our facility and maintain contamination levels and perform bioassays of occupationally exposed workers in accordance with the survey frequencies and contamination levels published in Appendix S of NUREG-1556, Volume 11, "Program-Specific Guidance About Licenses of Broad Scope".

Leak test procedures

We will implement the model leak test program published in Appendix T of NUREG-1556, Volume 11, "Program-Specific Guidance About Licenses of Broad Scope."

**11. Waste Management**

**Waste Collection**

Dry and wet waste will be segregated from each other, with each isotope kept separately of all others. In the case of isotopes where waste is to be decayed in



Trinity College  
HARTFORD CONNECTICUT

**Radiation Safety Officer Delegation of Authority**

I, the chief academic officer of Trinity College, affirm the College's commitment to keeping exposure to ionizing radiation as low as reasonably achievable (the ALARA concept). I delegate to the Radiation Safety Officer (RSO) authority for implementing the ALARA concept on Trinity's campus, and for managing the radiation safety program. The RSO will have complete access to any activities involving the use of radionuclides, and the authority to terminate any activity in which health and safety appear to be compromised.

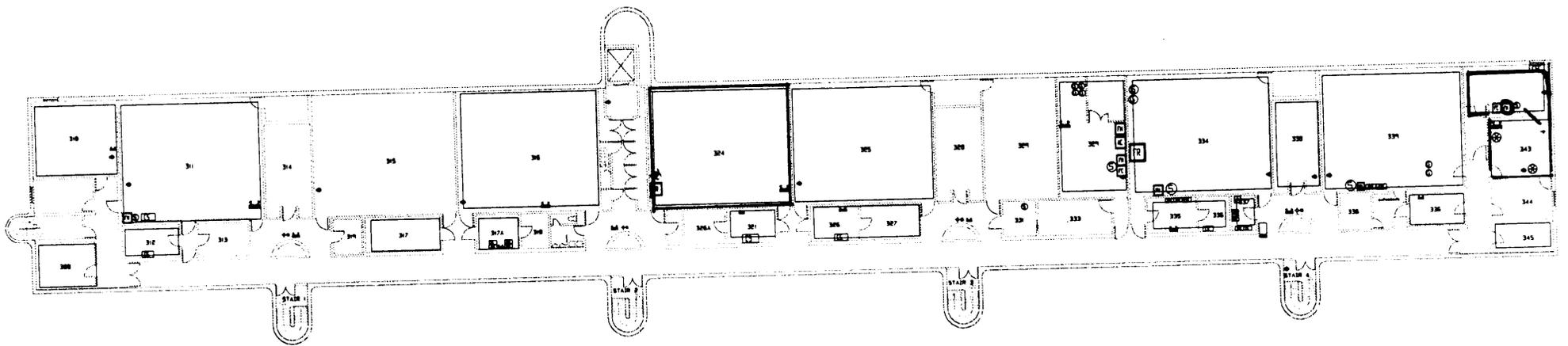
Prof. Frank Kirkpatrick  
Interim Dean of the Faculty

5-11-05

Date

DEPARTMENT OF BIOLOGY

300 SUMMIT STREET, HARTFORD, CT 06106-3100  
TEL (860) 297-2539 FAX (860) 297-2538 www.trincoll.edu



Red = rooms where radio isotope  
is used or stored

Green = Fine woods

Third Floor Plan  
Jacobs Life Science Center

**QUEST**  
TECHNOLOGIES

*'s Academic!*

On Management System For Higher

TCJLSC03.DWG

**Trinity College**  
**Buildings and Grounds Department**

238 New Britain Avenue  
Hartford, Connecticut 06106

FLOOR  
\*03

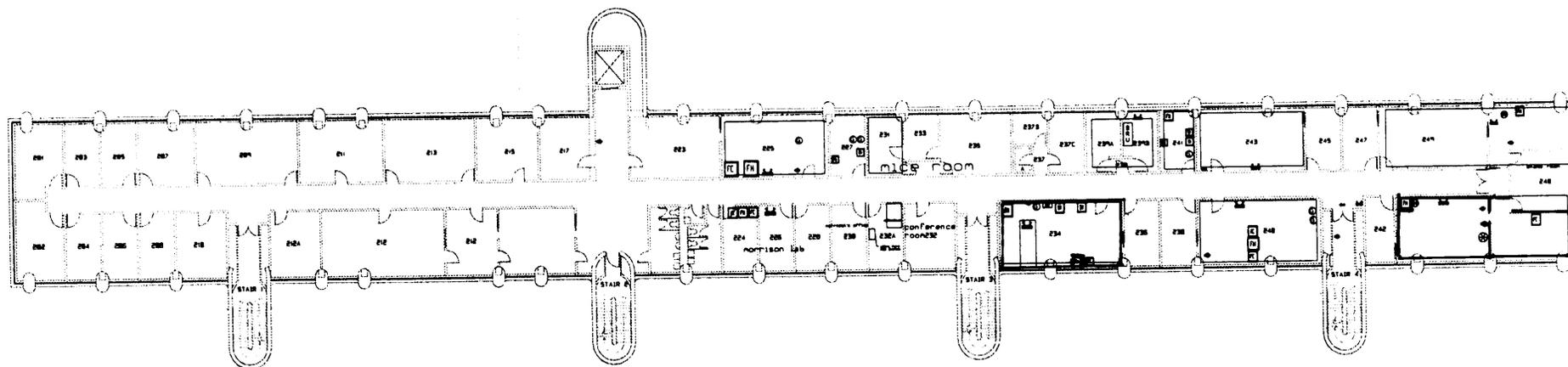
BUILDING C C  
42

PRINT DATE  
June 1, 1999

BUILDING NA  
Jacobs Life Science C

SURVEY DA  
May 29, 1999





Second Floor Plan  
Jacobs Life Science Center

**QUEST**  
TECHNOLOGIES

*It's Academic!*

Computer Aided Design System for Windows

E: TCJLSC02.DWG

**Trinity College**  
**Buildings and Grounds Department**

238 New Britain Avenue  
Hartford, Connecticut 06106

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# Trinity College Buildings and Grounds Department

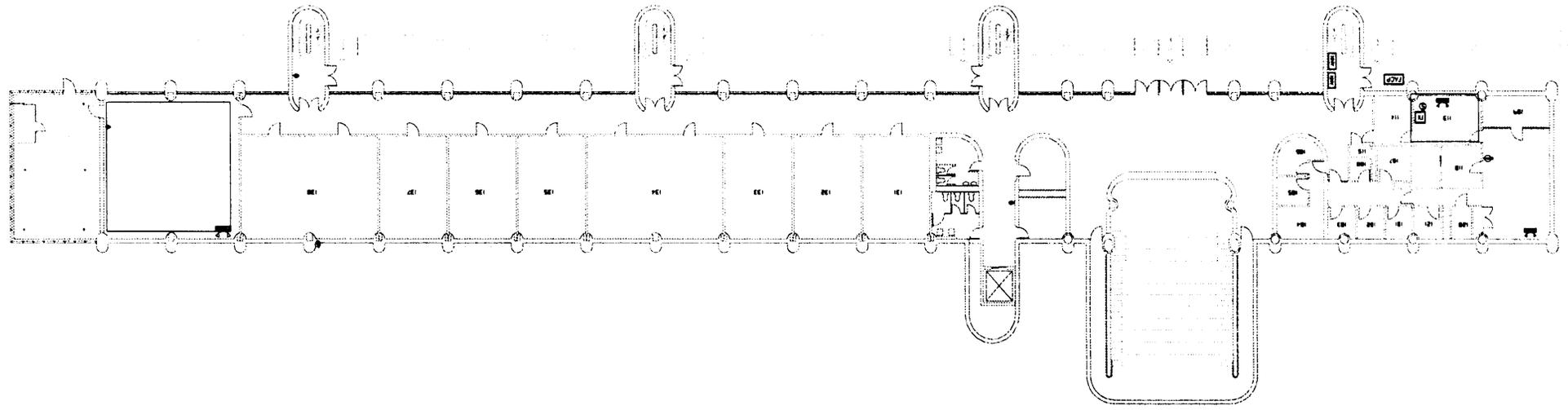
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Hartford, Connecticut 06106

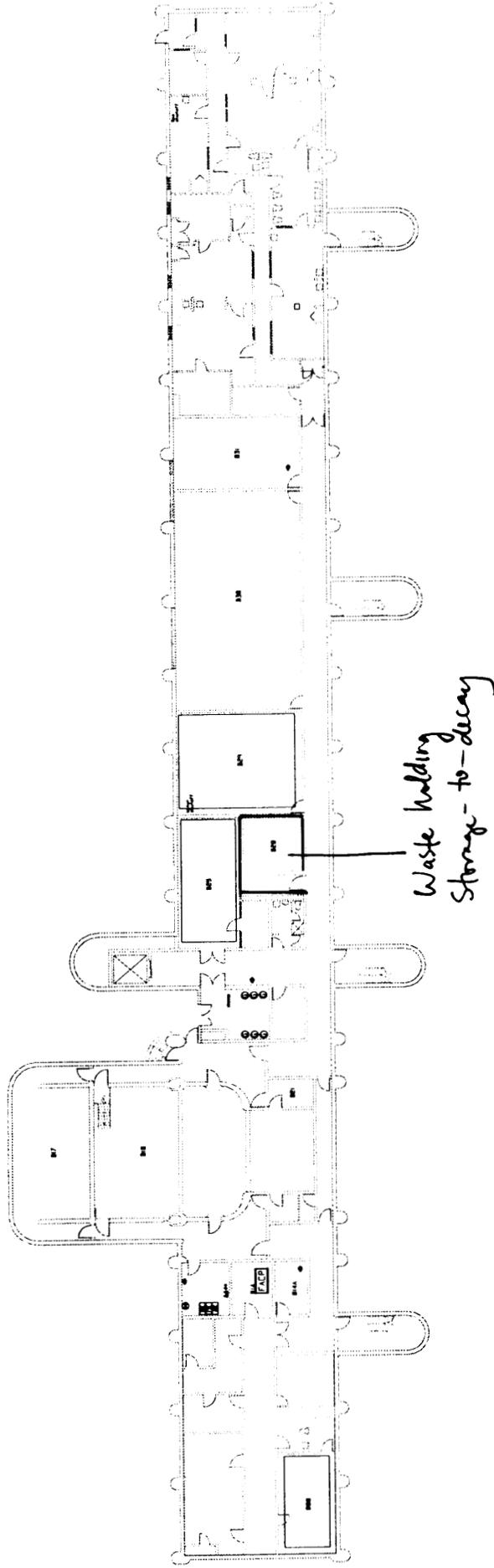


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| SURVEY DAT              |              |
| May 29, 1999            |              |

## First Floor Plan Jacobs Life Science Center

*No storage or use of  
radioactivity on 1st floor*





**Basement Floor Plan  
Jacobs Life Science Center**

**QUEST**  
ENOLOGIES

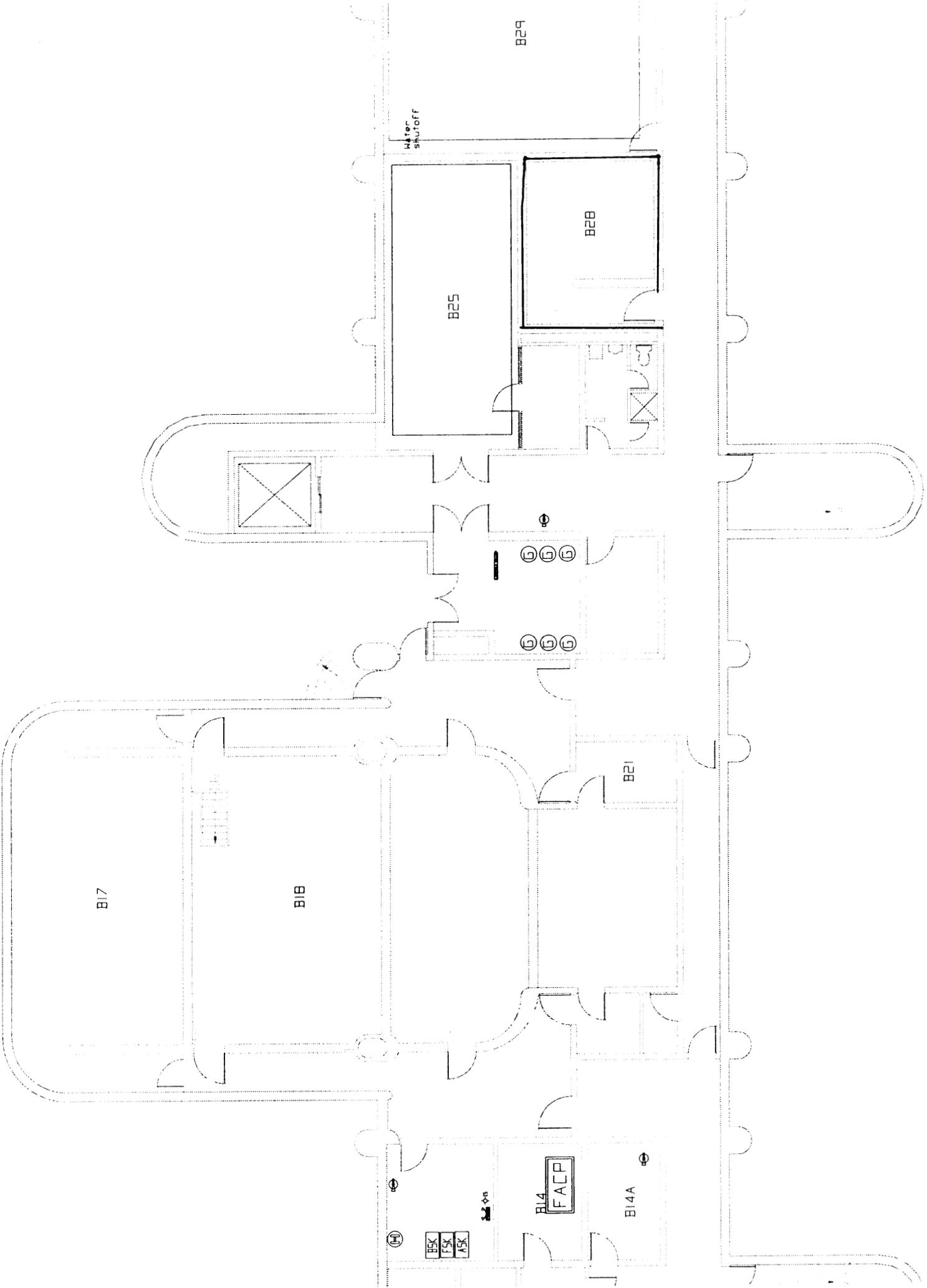
*It's Academic!*  
Facilities Management System for Higher Education

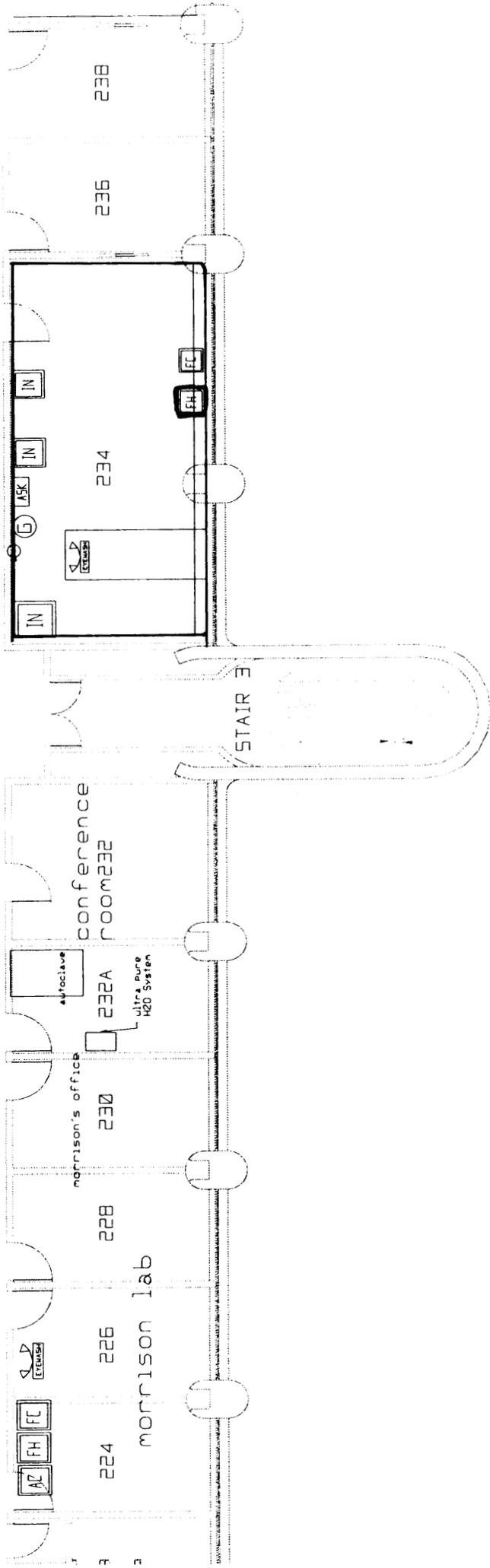
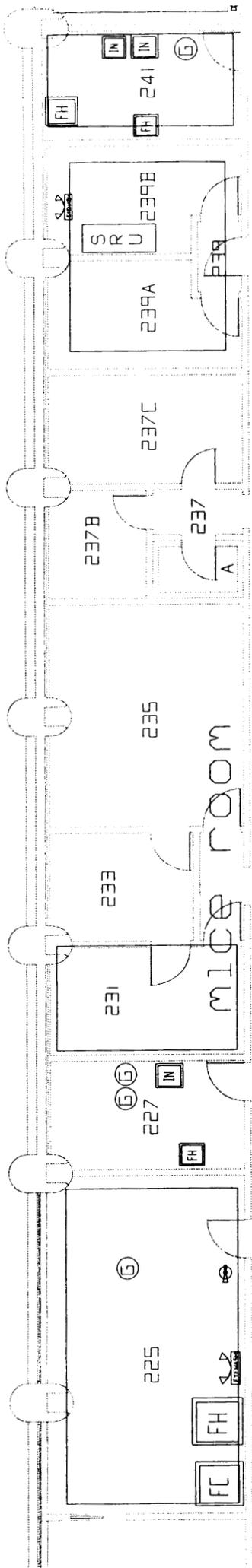
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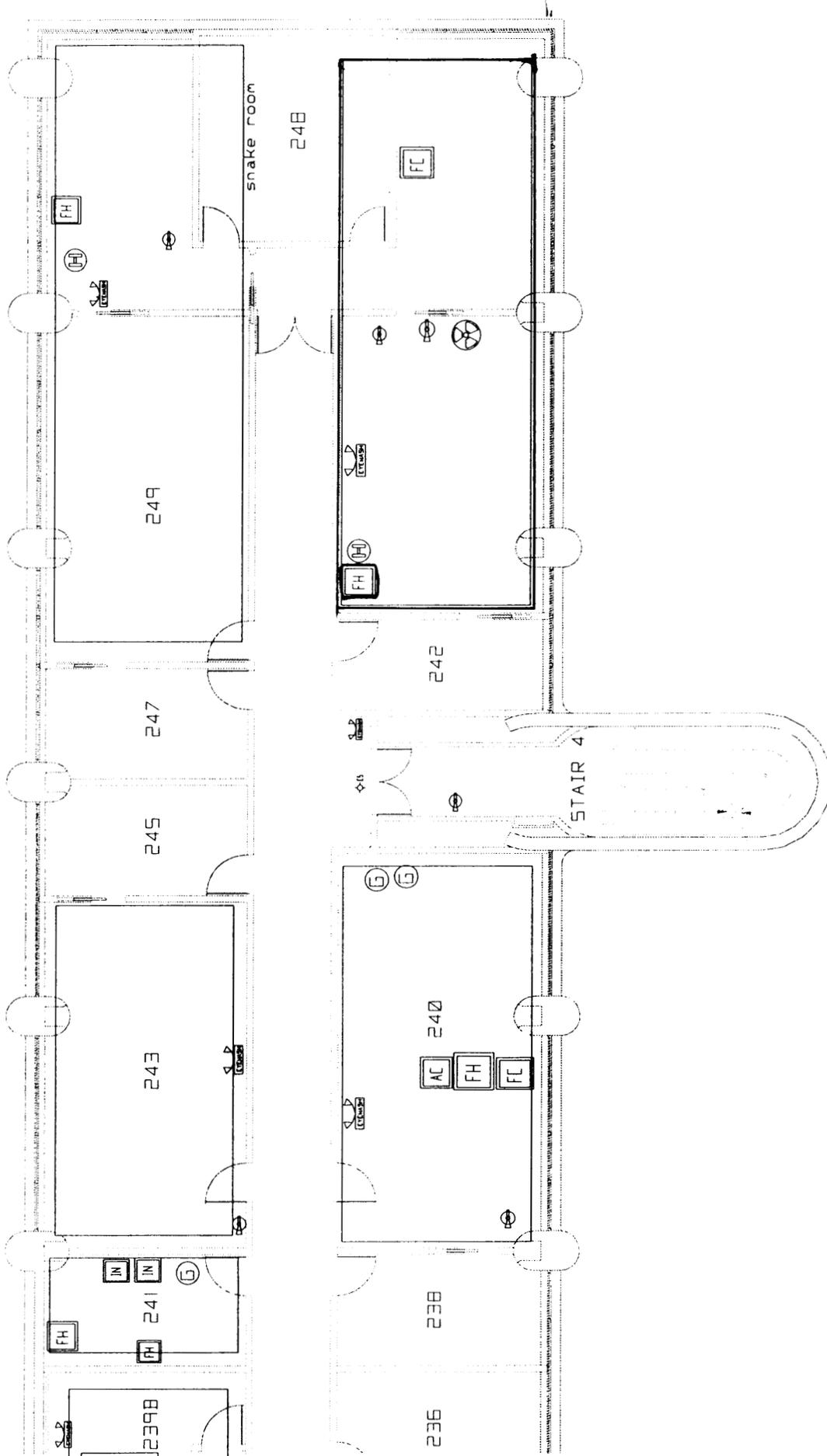
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Buildings and Grounds Department**  
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Hartford, Connecticut 06106

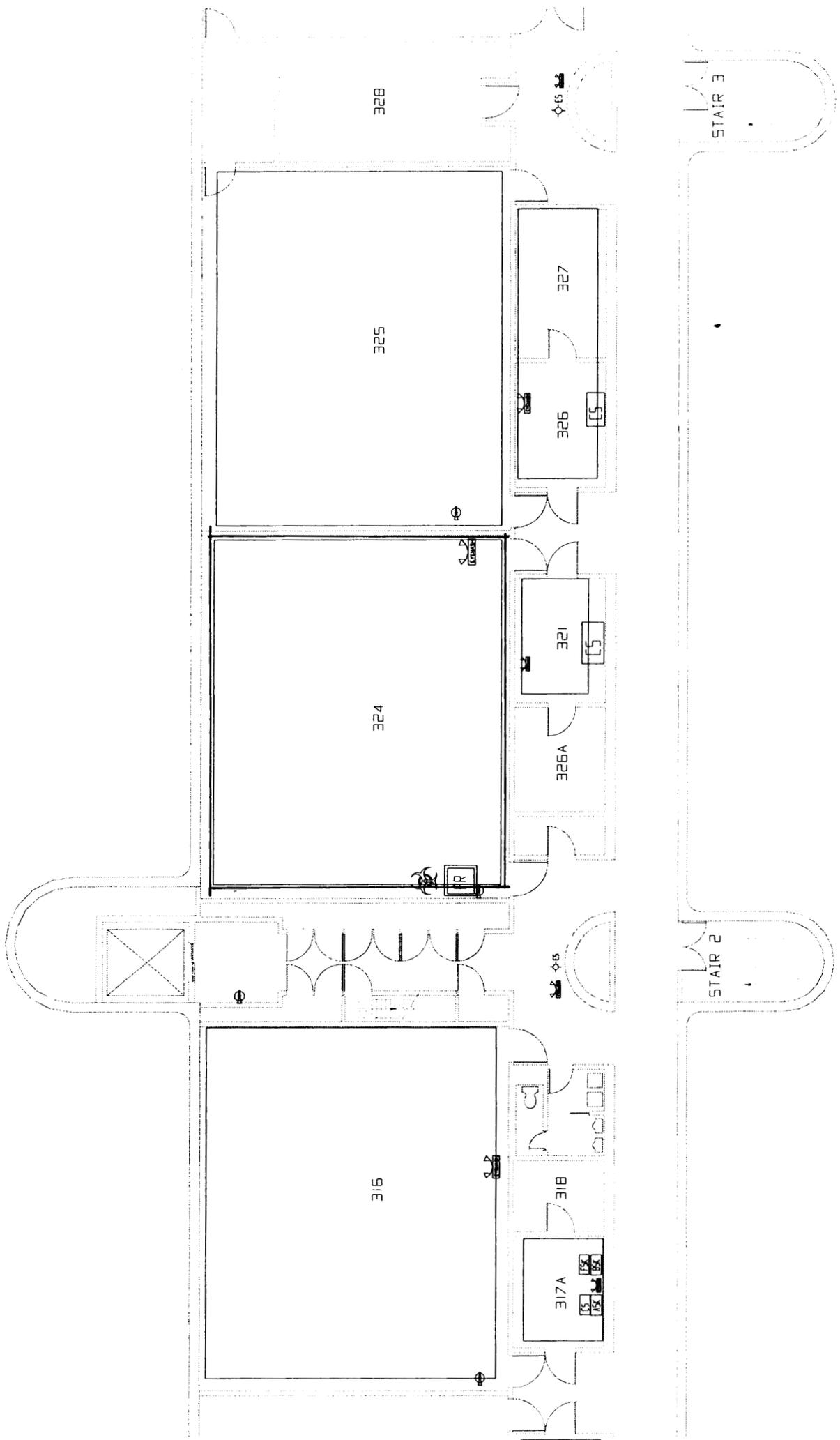
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| March 30, 2004      | Jacobs Life Sci |
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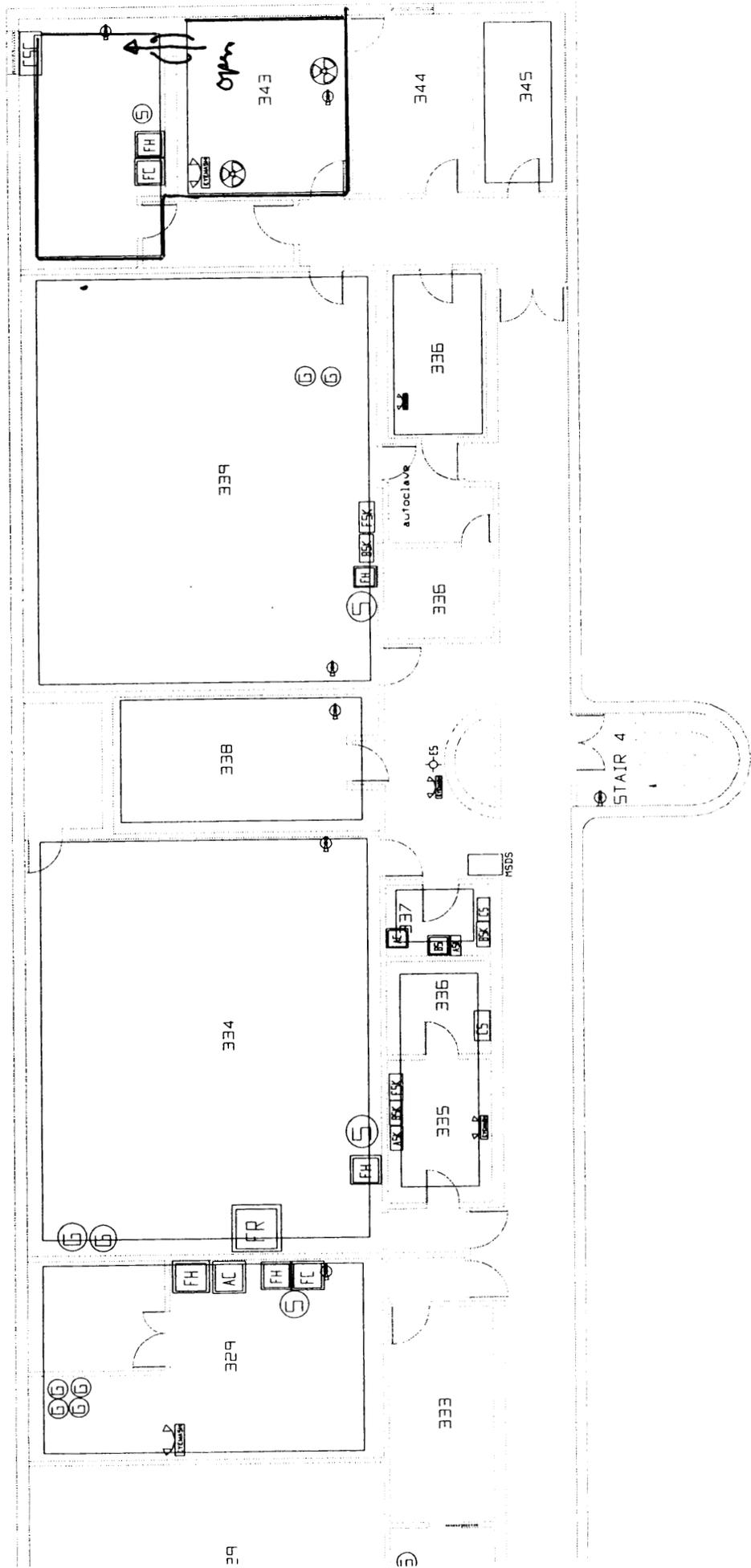


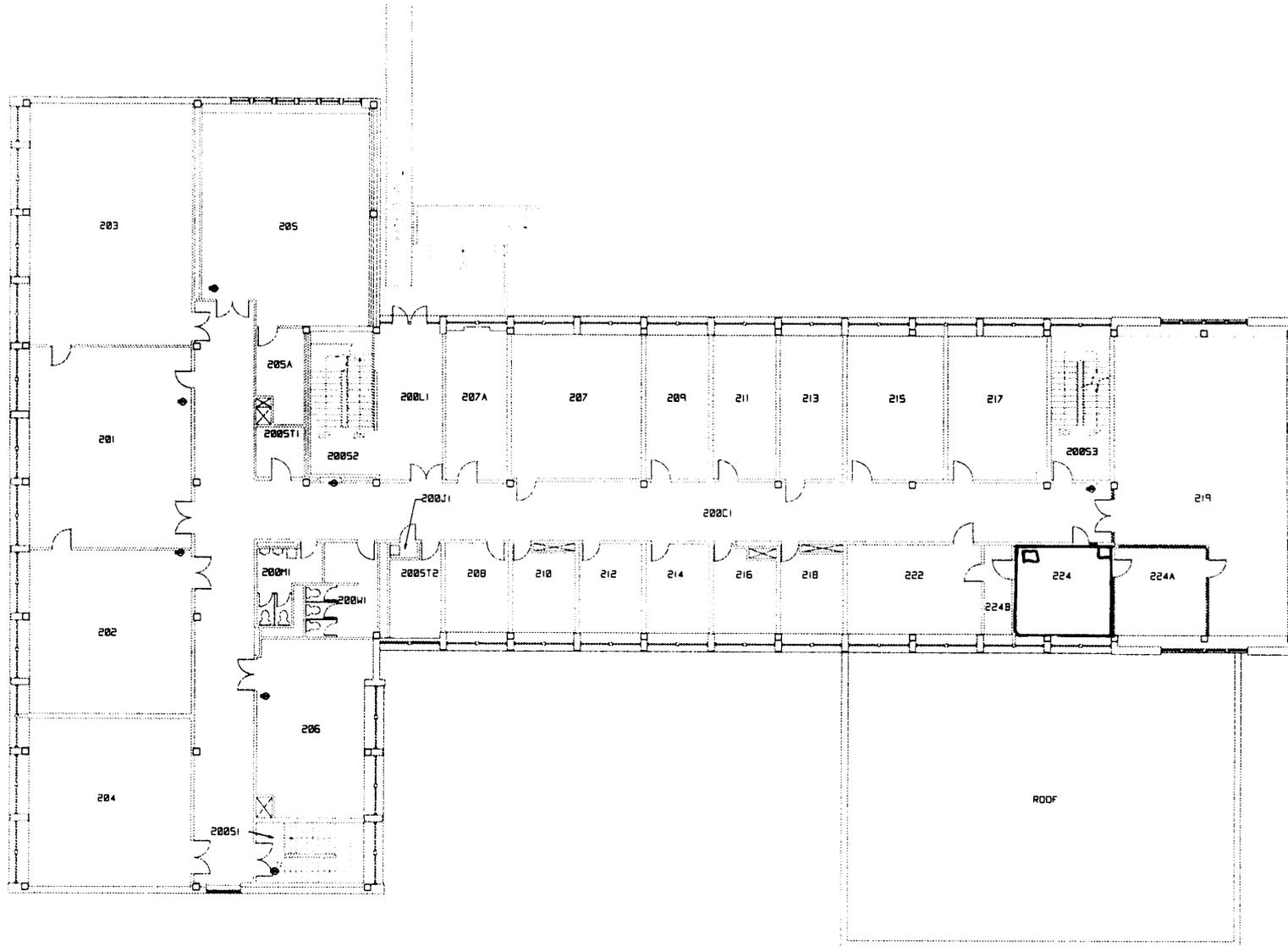












Second Floor Plan  
McCook Physics Building

This is to acknowledge the receipt of your letter/application dated

6/8/2005, and to inform you that the initial processing which includes an administrative review has been performed.

Renew 06-09045-03  
There were no administrative omissions. Your application was assigned to a technical reviewer. Please note that the technical review may identify additional omissions or require additional information.

Please provide to this office within 30 days of your receipt of this card

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A copy of your action has been forwarded to our License Fee & Accounts Receivable Branch, who will contact you separately if there is a fee issue involved.

Your action has been assigned Mail Control Number 137227.  
When calling to inquire about this action, please refer to this control number.  
You may call us on (610) 337-5398, or 337-5260.

(FOR LFMS USE)  
INFORMATION FROM LTS

BETWEEN:

License Fee Management Branch, ARM  
and  
Regional Licensing Sections

Program Code: 03620  
Status Code: 2  
Fee Category: EX 3M  
Exp. Date: 20050731  
Fee Comments: 170.11(A) (4)  
Decom Fin Assur Reqd: N

LICENSE FEE TRANSMITTAL

A. REGION **I**

1. APPLICATION ATTACHED

Applicant/Licensee: TRINITY COLLEGE  
Received Date: 20050628  
Docket No.: 3010179  
Control No.: 137227  
License No.: 06-09045-03  
Action Type: Renewal

2. FEE ATTACHED

Amount: 110.00  
Check No.: 124530

3. COMMENTS

**No Fee Due for  
Renewal**

Signed Subera Javed  
Date 6/13/05

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 \_\_\_\_\_