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UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
REGION I  
475 ALLENDALE ROAD  
KING OF PRUSSIA, PENNSYLVANIA 19406-1415

March 14, 2002

Docket No. 03006021  
Control No. 131165

License No. 37-01665-01

David E. Greenley, Ph.D.  
Director of Technology Operations  
Rohm and Hass Company  
Spring House Technical Center  
727 Norristown Road  
P. O. Box 904  
Spring House, PA 19477

SUBJECT: ROHM AND HASS COMPANY, ISSUANCE OF LICENSE AMENDMENT,  
CONTROL NO. 131165

Dear Dr. Greenley:

This refers to your license amendment request dated February 25, 2002, that was received in this office on March 8, 2002. Enclosed with this letter is the amended license.

Please note that Condition 10 of your license is also amended to include the new name of one of the authorized locations of use, and Condition 16 of your license is revised in accordance with current NRC policy. Please review the enclosed document carefully and be sure that you understand and fully implement all the conditions incorporated into the amended license. If there are any errors or questions, please notify the U.S. Nuclear Regulatory Commission, Region I Office, Licensing Assistance Team, (610) 337-5239, so that we can provide appropriate corrections and answers.

In accordance with 10 CFR 2.790, a copy of this letter will be placed in the NRC Public Document Room and will be accessible from the NRC Web site at <http://www.nrc.gov/readingrm.htm>.

Thank you for your cooperation.

Sincerely,

*Original signed by Sattar Lodhi, Ph.D.*

Sattar Lodhi, Ph.D.  
Health Physicist  
Nuclear Materials Safety Branch 2  
Division of Nuclear Materials Safety

Enclosure:  
Amendment No. 63

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NAME	SLodhi/ASL					
DATE	3/14/2002					

OFFICIAL RECORD COPY

**MATERIALS LICENSE**

Pursuant to the Atomic Energy Act of 1954, as amended, the Energy Reorganization Act of 1974 (Public Law 93-438), and Title 10, Code of Federal Regulations, Chapter I, Parts 30, 31, 32, 33, 34, 35, 36, 39, 40, and 70, and in reliance on statements and representations heretofore made by the licensee, a license is hereby issued authorizing the licensee to receive, acquire, possess, and transfer byproduct, source, and special nuclear material designated below; to use such material for the purpose(s) and at the place(s) designated below; to deliver or transfer such material to persons authorized to receive it in accordance with the regulations of the applicable Part(s). This license shall be deemed to contain the conditions specified in Section 183 of the Atomic Energy Act of 1954, as amended, and is subject to all applicable rules, regulations, and orders of the Nuclear Regulatory Commission now or hereafter in effect and to any conditions specified below.

<p style="text-align: center;">Licensee</p> <p>1. Rohm and Haas Company Spring House Technical Center</p> <p>2. 727 Norristown Road P. O. Box 904 Spring House, Pennsylvania, 19477</p>	<p>In accordance with the letter dated February 25, 2002,</p> <p>3. License number 37-01665-01 is amended in its entirety to read as follows:</p> <hr/> <p>4. Expiration date November 30, 2004</p> <hr/> <p>5. Docket No. 030-06021 Reference No.</p>
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<p>6. Byproduct, source, and/or special nuclear material</p> <p>A. Any byproduct material with atomic numbers 3 through 83</p> <p>B. Hydrogen 3</p> <p>C. Carbon 14</p> <p>D. Nickel 63</p>	<p>7. Chemical and/or physical form</p> <p>A. Any</p> <p>B. Any</p> <p>C. Any</p> <p>D. Plated sources or foils</p>	<p>8. Maximum amount that licensee may possess at any one time under this license</p> <p>A. 100 millicuries per radionuclide and 2 curies total</p> <p>B. 1 curies</p> <p>C. 10 curies</p> <p>D. 15 millicuries per source and 700 millicuries total</p>
<p>9. Authorized use:</p> <p style="text-align: center;">★ ★ ★ ★ ★</p> <p>A. through C. Research and development as defined in 10 CFR 30.4; animal studies.</p> <p>D. In electron capture detector cells which are distributed under a specific license issued by the U.S. Nuclear Regulatory Commission or any Agreement State.</p>		

**CONDITIONS**

10. Licensed material may be used at licensee's facilities located at Spring House Technical Center, Norristown and McKean Roads, Spring House, Pennsylvania; Rohm and Haas Philadelphia Plant, 5000 Richmond Street, Philadelphia, Pennsylvania; Rohm and Haas Spring House Farm, 1305 McKean Road, Spring House, Pennsylvania; and Rohm and Haas Bristol Plant, Routes 13 and 413, Bristol, Pennsylvania. Nickel 63 in gas chromatographs may also be used at the Rohm and Haas Croydon Plant, River Road, Bristol, Pennsylvania.

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11. A. Licensed material shall be used by, or under the supervision of, individuals designated in writing by the Radiation Safety Committee, Alan M. Rothman, Ph.D. and David E. Greenley, Ph.D., Co-Chairmen.
- B. The Radiation Safety Officer for this license is Alan M. Rothman, Ph.D.
12. Licensed material shall not be used in or on human beings.
13. A. Except as noted in Paragraph B. of this Condition, the licensee shall not use licensed material in field applications where activity is released.
- B. Carbon 14 may be used in field application studies at the licensee's experimental farm located in Spring House, Pennsylvania, in accordance with procedures described in the application dated October 11, 1993 and the letter dated September 8, 1994.
14. Experimental animals or the products from experimental animals, that have been administered licensed materials shall not be used for human consumption.
15. Plants used in experiments which utilize licensed material or their products shall not be used for human consumption or distributed to the public.
16. A. Sealed sources shall be tested for leakage and/or contamination at intervals not to exceed the intervals specified in the certificate of registration issued by the U.S. Nuclear Regulatory Commission under 10 CFR 32.210 or under equivalent regulations of an Agreement State.
- B. In the absence of a certificate from a transferor indicating that a leak test has been made within the intervals specified in the certificate of registration issued by the U.S. Nuclear Regulatory Commission under 10 CFR 32.210 or under equivalent regulations of an Agreement State, prior to the transfer, a sealed source received from another person shall not be put into use until tested and the test results received.
- C. Sealed sources need not be tested if they are in storage and are not being used; however, when they are removed from storage for use or transferred to another person and have not been tested within the required leak test interval, they shall be tested before use or transfer. No sealed source shall be stored for a period of more than 10 years without being tested for leakage and/or contamination.

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- D. The leak test shall be capable of detecting the presence of 0.005 microcurie (185 becquerels) of radioactive material on the test sample. If the test reveals the presence of 0.005 microcurie (185 becquerels) or more of removable contamination, a report shall be filed with the U.S. Nuclear Regulatory Commission in accordance with 10 CFR 30.50(c)(2), and the source shall be removed immediately from service and decontaminated, repaired, or disposed of in accordance with Commission regulations.
- E. Tests for leakage and/or contamination, including leak test sample collection and analysis, shall be performed by the licensee or by other persons specifically licensed by the U.S. Nuclear Regulatory Commission or an Agreement State to perform such services.
17. Sealed sources or detector cells containing licensed material shall not be opened or sources removed from source holders by the licensee.
18. The licensee shall not acquire licensed material in a sealed source or device unless the source or device has been registered with the U.S. Nuclear Regulatory Commission pursuant to 10 CFR 32.210 or equivalent regulations of an Agreement State.
19. The licensee shall conduct a physical inventory every six months to account for all sealed sources and devices containing licensed material received and possessed under the license.
20. A. Detector cells containing a titanium tritide foil or a scandium tritide foil shall only be used in conjunction with a properly operating temperature control mechanism which prevents the foil temperatures from exceeding that specified in the certificate of registration referred to in 10 CFR 32.210.
- B. When in use, detector cells containing a titanium tritide foil or a scandium tritide foil shall be vented to the outside.
21. The licensee is authorized to hold radioactive material with a physical half-life of less than 120 days for decay-in-storage before disposal in ordinary trash, provided:
- A. Waste to be disposed of in this manner shall be held for decay a minimum of ten half-lives.
- B. Before disposal as ordinary trash, the waste shall be surveyed at the container surface with the appropriate survey instrument set on its most sensitive scale and with no interposed shielding to determine that its radioactivity cannot be distinguished from background. All radiation labels shall be removed or obliterated.

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- C. A record of each such disposal permitted under this Condition shall be retained for three years. The record must include the date of disposal, the date on which the byproduct material was placed in storage, the radionuclides disposed, the survey instrument used, the background dose rate, the dose rate measured at the surface of each waste container, and the name of the individual who performed the disposal.
22. Radioactive waste generated shall be stored in accordance with the statements, representations, and procedures included with the waste storage plan described in the licensee's letters dated September 8, 1994 and October 20, 1994.
23. Pursuant to 10 CFR 20.2002, the licensee is authorized to dispose of licensed material by incineration in accordance with the application dated October 11, 1993 and letters dated July 3, 1975 and September 8, 1994.
24. The licensee is authorized to transport licensed material in accordance with the provisions of 10 CFR Part 71, "Packaging and Transportation of Radioactive Material."
25. Notwithstanding the requirements of Condition 26, the licensee is authorized to make program changes and changes to procedures specifically identified in the letters dated December 7, 1999 and January 20, 2000, which were previously approved by the U.S. Nuclear Regulatory Commission and incorporated into the license without prior Commission approval as long as:
- A. The proposed revision is documented, reviewed, and approved by the licensee's Radiation Safety Committee in accordance with established procedures prior to implementation.
  - B. The revised program is in accordance with regulatory requirements, will not change the license conditions, and will not decrease the effectiveness of the Radiation Safety Program.
  - C. The licensee's staff is trained in the revised procedures prior to implementation.
  - D. The licensee's audit program evaluates the effectiveness of the change and its implementation.

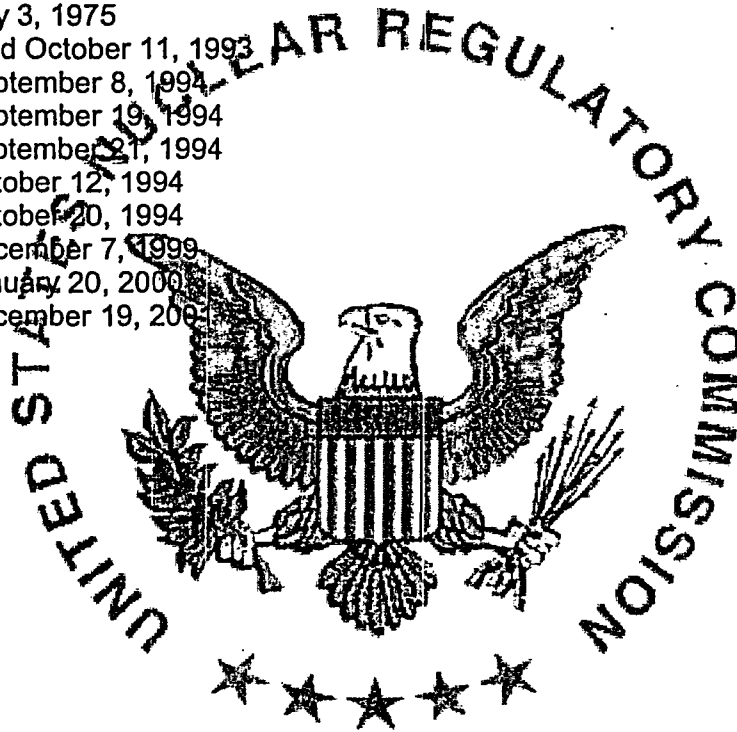
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26. Except as specifically provided otherwise in this license, the licensee shall conduct its program in accordance with the statements, representations, and procedures contained in the documents, including any enclosures, listed below. The U.S. Nuclear Regulatory Commission's regulations shall govern unless the statements, representations, and procedures in the licensee's application and correspondence are more restrictive than the regulations.
- A. Letter dated July 3, 1975
  - B. Application dated October 11, 1993
  - C. Letter dated September 8, 1994
  - D. Letter dated September 19, 1994
  - E. Letter dated September 21, 1994
  - F. Letter dated October 12, 1994
  - G. Letter dated October 20, 1994
  - H. Letter dated December 7, 1999
  - I. Letter dated January 20, 2000
  - J. Letter dated December 19, 2001



For the U.S. Nuclear Regulatory Commission

Date March 14, 2002

By

*Original signed by Sattar Lodhi, Ph.D.*

Sattar Lodhi, Ph.D.  
Nuclear Materials Safety Branch 2  
Division of Nuclear Materials Safety  
Region I  
King of Prussia, Pennsylvania 19406