**ACCEPTANCE REVIEW MEMO (ARM)**

**Licensee:** Colaska dba Secon Southwest Alaska  
**License No.:**  

**Docket No.:** 030-37206  
**Mail Control No.:** 470982  

**Type of Action:** New  
**Date of Requested Action:** 05-05-06  

**Reviewer Assigned:** ARM reviewer(s): Torres

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<table>
<thead>
<tr>
<th>Response</th>
<th>Deficiencies Noted During Acceptance Review</th>
</tr>
</thead>
</table>
| | [ ] Inform licensee that we are limiting possession limits.  
| | [ ] Ask the licensee if they have any type-amount of EPAct Material. |
| 2. | NOTE: Need to request license from State of Alaska for the RA226 gauge. |

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**Reviewer’s Initials:**  
**Date:**

- □ Yes □ No Request for unrestricted use for Group 2 or higher category should be transferred by memo to FCDB within 10 days of receipt.  
- □ Yes □ No Decommissioning notification should be completed within 30 days.  
- □ Yes □ No Termination request < 90 days from date of expiration  
- □ Yes □ No Expedite (medical emergency, no RSO, location of use/storage not on license, RAM in possession not on license, other)  
- □ Yes □ No TAR needed to complete action.

**Branch Chief’s and/or Sr. HP’s Initials:**  
**Date:**

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**SUNS1 Screening according to RIS 2005-31**  
**□ Yes □ No** Non-Publicly Available, Sensitive if any item below is checked

**General guidance:**  
- __RAM = or > than Category 3 (Table 1, RIS 2005-31), use Unity Rule__  
- __Exact location of RAM (whether = or > than Category 3 or not)__  
- __Design of structure and/or equipment (site specific)__  
- __Information on nearby facilities__  
- __Detailed design drawings and/or performance information__  
- __Emergency planning and/or fire protection systems__

**Specific guidance for medical, industrial and academic (above Category 3):**  
- __RAM quantities and inventory__  
- __Manufacturer’s name and model number of sealed sources & devices__  
- __Site drawings with exact location of RAM, description of facility__  
- __RAM security program information (locks, alarms, etc.)__  
- __Emergency Plan specifics (routes to/from RAM, response to security events)__  
- __Vulnerability/security assessment/accident-safety analysis/risk assess__  
- __Mailing lists related to security response__

**Branch Chief’s and/or Sr. HP’s Initials:**  
**Date:** 5/16/06
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:
CONNECTICUT, DELAWARE, DISTRICT OF COLUMBIA, MAINE, MARYLAND, MASSACHUSETTS, NEW HAMPSHIRE, NEW JERSEY, NEW YORK, PENNSYLVANIA, RHODE ISLAND, OR VERMONT, SEND APPLICATIONS TO:

NUCLEAR MATERIALS LICENSING SECTION
U S NUCLEAR REGULATORY COMMISSION, REGION I
475 ALLIENALDE ROAD
KING OF PRUSSIA, PA 19406-1415

ALABAMA, FLORIDA, GEORGIA, KENTUCKY, MISSISSIPPI, NORTH CAROLINA, PUERTO RICO, SOUTH CAROLINA, TENNESSEE, VIRGINIA, VIRGIN ISLANDS, OR WEST VIRGINIA, SEND APPLICATIONS TO:

SAM NUNN ATLANTA FEDERAL CENTER
U S NUCLEAR REGULATORY COMMISSION, REGION II
81 FORSYTH STREET, S W, SUITE 2385
ATLANTA, GEORGIA 30303-6931

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

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

Colaska DBA Secon Southeast Alaska
5322 Shaune Drive
Juneau, Alaska 99801

3. ADDRESS WHERE LICENSED MATERIAL WILL BE USED OR POSSESSED

City of Juneau and surrounding areas

4. NAME OF PERSON TO BE CONTACTED ABOUT THIS APPLICATION

Richard H. Olson, Jr. (RSO)

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. (Medical use applicants Complete NRC Form 313A)

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)

13. CERTIFICATION (Must be completed by applicant) THE APPLICANT UNDERSTANDS THAT ALL STATEMENTS AND REPRESENTATIONS MADE IN THIS APPLICATION ARE BINDING UPON 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, 38, 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 82 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 - TYPE/PRIINTED NAME AND TITLE

Richard H. Olson, Jr. Technical Manager/RSO

SIGNATURE

DATE

65-05-06

FOR NRC USE ONLY

PRINTED ON RECYCLED PAPER

NRC FORM 313 11-2006
## APPENDIX B

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

<table>
<thead>
<tr>
<th>Yes</th>
<th>No</th>
<th>Radioisotope</th>
<th>Manufacturer or Distributor Model No.</th>
<th>Quantity</th>
<th>Use As Listed on SSD Certificate</th>
<th>Specify Other Uses Not Listed on SSD Certificate</th>
</tr>
</thead>
<tbody>
<tr>
<td>✓</td>
<td></td>
<td>Cesium-137</td>
<td>Sealed source manufacturer or distributor and model number: CPU International CPM-131</td>
<td>Not to exceed either the maximum activity per source or maximum activity per device as specified in Sealed Source and Device Registration Certificate</td>
<td>Yes ⚡</td>
<td>Not applicable</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Device manufacturer or distributor and model number: CPU International ME-1 DR</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>✓</td>
<td></td>
<td>Americium-241</td>
<td>Sealed source manufacturer or distributor and model number: CPU International CPM-131</td>
<td>Not to exceed either the maximum activity per source or maximum activity per device as specified in Sealed Source and Device Registration Certificate</td>
<td>Yes ⚡</td>
<td>Not applicable</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Device manufacturer or distributor and model number: CPU International ME-1 DR</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

*Note: Uses are: (Submit safety analysis supporting safe use)*
ITEMS 5 AND 6: MATERIALS TO BE POSSESSED AND PROPOSED USES

<table>
<thead>
<tr>
<th>Yes</th>
<th>No</th>
<th>Radioisotope</th>
<th>Manufacturer or Distributor Model No.</th>
<th>Quantity</th>
<th>Use As Listed on SSD Certificate</th>
<th>Specify Other Uses Not Listed on SSD Certificate</th>
</tr>
</thead>
</table>
| ✔   |    | Cesium-137   | Sealed source manufacturer or distributor and model number:  
Troxler Electronics  
Trox Drawing: 102121.2  
Device manufacturer or distributor and model number:  
Troxler Electronics  
3500 Series | Not to exceed either the maximum activity per source or maximum activity per device as specified in Sealed Source and Device Registration Certificate | Yes  
Specific description of the gauge use:  
Construction Materials  
Testing | ☑ Not applicable  
Uses are:  
(Submit safety analysis supporting safe use) |
| ✔   |    | Americium-241 | Sealed source manufacturer or distributor and model number:  
Troxler Electronics  
Trox Drawing: 102491  
Device manufacturer or distributor and model number:  
Troxler Electronics  
3500 Series | Not to exceed either the maximum activity per source or maximum activity per device as specified in Sealed Source and Device Registration Certificate | Yes  
Specific description of the gauge use:  
Construction Materials  
Testing | ☑ Not applicable  
Uses are:  
(Submit safety analysis supporting safe use) |
<table>
<thead>
<tr>
<th>Yes</th>
<th>No</th>
<th>Radioisotope</th>
<th>Manufacturer or Distributor Model No.</th>
<th>Quantity</th>
<th>Use As Listed on SSD Certificate</th>
<th>Specify Other Uses Not Listed on SSD Certificate</th>
</tr>
</thead>
<tbody>
<tr>
<td>✓</td>
<td>✓</td>
<td>Californium-252</td>
<td>Sealed source manufacturer or distributor and model number:</td>
<td>Not to exceed either the maximum activity per source or maximum activity per device as specified in Sealed Source and Device Registration Certificate</td>
<td>Yes DH? Specific description of the gauge use:</td>
<td>☐ Not applicable</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Device manufacturer or distributor and model number:</td>
<td></td>
<td></td>
<td>☐ Uses are:</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>(Submit safety analysis supporting safe use)</td>
</tr>
<tr>
<td>✓</td>
<td>✓</td>
<td>Other Isotope (Specify): Radium-226 Beryllium</td>
<td>Sealed source manufacturer or distributor and model number: Amersham Corp Med# Ran. W25</td>
<td>Not to exceed either the maximum activity per source or maximum activity per device as specified in Sealed Source and Device Registration Certificate</td>
<td>Yes ✓ Specific description of the gauge use: Construction Materials Testing</td>
<td>☐ Not applicable</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Device manufacturer or distributor and model number: Sievers Nuclear Corp Med# C-200</td>
<td></td>
<td></td>
<td>☐ Uses are:</td>
</tr>
<tr>
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<td></td>
<td></td>
<td>(Submit safety analysis supporting safe use)</td>
</tr>
</tbody>
</table>

Financial Assurance Required and Evidence of Financial Assurance Provided
ITEMS 7 THROUGH 11: TRAINING AND EXPERIENCE, FACILITIES AND EQUIPMENT, RADIATION SAFETY PROGRAM, AND WASTE DISPOSAL

<table>
<thead>
<tr>
<th>Item No. And Title</th>
<th>Suggested Response</th>
<th>Yes</th>
<th>Alternative Procedures Attached</th>
</tr>
</thead>
<tbody>
<tr>
<td>7. INDIVIDUAL(S) RESPONSIBLE FOR RADIATION SAFETY PROGRAM AND THEIR TRAINING AND EXPERIENCE – RADIATION SAFETY OFFICER</td>
<td>Before obtaining licensed materials, the proposed RSO will have successfully completed one of the training courses described in Criteria in the section entitled &quot;Individual(s) Responsible for Radiation Safety Program and Their Training and Experience – Radiation Safety Officer&quot; in NUREG-1556, Vol. 1, Rev. 1, dated September 2001.</td>
<td>☑</td>
<td>☐</td>
</tr>
<tr>
<td>8. TRAINING FOR INDIVIDUALS WORKING IN OR FREQUENTING RESTRICTED AREAS</td>
<td>Before using licensed materials, authorized users will have successfully completed one of the training course described in Criteria in the section entitled &quot;Training for Individuals Working In or Frequenting Restricted Areas&quot; in NUREG-1556, Vol. 1, Rev. 1, dated September 2001.</td>
<td>☑</td>
<td>☐</td>
</tr>
<tr>
<td>9. FACILITIES AND EQUIPMENT</td>
<td>No information needs to be submitted in response to this item; key issues are addressed under &quot;Radiation Safety Program – Public Dose&quot; and &quot;Radiation Safety Program – Operating and Emergency Procedures.&quot;</td>
<td>☑</td>
<td>☐</td>
</tr>
<tr>
<td>10. RADIATION SAFETY PROGRAM – AUDIT PROGRAM</td>
<td>The applicant is not required to, and should not, submit its audit program to NRC for review during the licensing phase.</td>
<td>☑</td>
<td>☐</td>
</tr>
<tr>
<td>10. RADIATION SAFETY PROGRAM – TERMINATION OF ACTIVITIES</td>
<td>The applicant is not 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.</td>
<td>☑</td>
<td>☐</td>
</tr>
<tr>
<td>10. RADIATION SAFETY PROGRAM – SURVEY INSTRUMENTS</td>
<td>We will either possess and use, or have access to and use, a radiation survey meter that meets the Criteria in the section entitled &quot;Radiation Safety Program – Instruments&quot; in NUREG-1556, Vol. 1, Rev. 1, dated September 2001.</td>
<td>☑</td>
<td>☐</td>
</tr>
<tr>
<td>Item No. And Title</td>
<td>Suggested Response</td>
<td>Yes</td>
<td>Alternative Procedures Attached</td>
</tr>
<tr>
<td>--------------------------------------------------------</td>
<td>-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------</td>
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<td>----------------------------------</td>
</tr>
<tr>
<td>10. RADIATION SAFETY PROGRAM – MATERIAL RECEIPT AND ACCOUNTABILITY</td>
<td>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.</td>
<td>☑️</td>
<td>☐️</td>
</tr>
<tr>
<td>10. RADIATION SAFETY PROGRAM – OCCUPATIONAL DOSIMETRY</td>
<td>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.</td>
<td>☑️</td>
<td>☐️</td>
</tr>
<tr>
<td>10. RADIATION SAFETY PROGRAM – PUBLIC DOSE</td>
<td>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.</td>
<td>☑️</td>
<td>Need Not Be Submitted With Application</td>
</tr>
<tr>
<td>10. RADIATION SAFETY PROGRAM – OPERATING AND EMERGENCY PROCEDURES</td>
<td>We will implement and maintain the operating and emergency procedures in Appendix H of NUREG-1556, Vol. 1, Rev. 1, dated September 2001, and provide copies of these procedures to all gauge users and at each job site. \n\n<strong>OR</strong> \nOperating 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 September 2001.</td>
<td>☑️</td>
<td>☐️</td>
</tr>
<tr>
<td>10. RADIATION SAFETY PROGRAM – LEAK TEST</td>
<td>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.</td>
<td>☑️</td>
<td>☐️</td>
</tr>
</tbody>
</table>

The information in Appendix J supporting a request to perform leak testing and sample analysis is attached.
## Item No. And Title

<table>
<thead>
<tr>
<th>Item No.</th>
<th>Title</th>
<th>Suggested Response</th>
<th>Yes</th>
<th>Alternative Procedures Attached</th>
</tr>
</thead>
<tbody>
<tr>
<td>10.</td>
<td>RADIATION SAFETY PROGRAM – MAINTENANCE</td>
<td><em>Routine Cleaning and Lubrication</em></td>
<td>✔️</td>
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<td></td>
<td>We will implement and maintain procedures for routine maintenance of our gauges</td>
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<td>according to each manufacturer's recommendations and instructions.</td>
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<tr>
<td></td>
<td></td>
<td><em>Non-Routine Maintenance</em></td>
<td>✔️</td>
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<td>We will send the gauge to the manufacturer or other person authorized by NRC or</td>
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<td></td>
<td></td>
<td>an Agreement State to perform non-routine maintenance or repair operations that</td>
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<tr>
<td></td>
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<td>require the removal of the source or source rod from the gauge.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>10.</td>
<td>RADIATION SAFETY PROGRAM – TRANSPORTATION</td>
<td><em>The applicant is not required to submit its response to transportation during the</em></td>
<td>Need Not Be Submitted With Application</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>licensing process. However, this issue will be reviewed during inspection.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>11.</td>
<td>WASTE MANAGEMENT – GAUGE DISPOSAL AND</td>
<td><em>The applicant is not required to submit a response to waste management during the</em></td>
<td>Need Not Be Submitted With Application</td>
<td></td>
</tr>
<tr>
<td></td>
<td>TRANSFER</td>
<td>licensing process. However, the licensee should develop, implement, and maintain</td>
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<tr>
<td></td>
<td></td>
<td>gauge transfer and disposal procedures in its radiation protection program.</td>
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</tbody>
</table>