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Mr. Brian Parker  
License Reviewer / Inspector  
US Nuclear Regulatory Commission / Region I  
475 Allendale Road  
King of Prussia, PA 19406-1415

June 21, 2006

03006551

**Re: License # 45-03253-02 /Request for Amendment/Notification of program changes.**

Dear Mr. Parker:

The usage of by-product materials here at Covance is much reduced. This trend, as you may observe in our license/amendment file, has undergone further reductions in scope beginning in early July of 2003. Unfortunately this has caused a fairly large need to update both the license and for that matter the representations made in the original license application. Ordinarily, with 5 five year term licenses, we would have already been through a mandatory renewal by now although, as you are well aware, we are still 4 years away from our 10 year license term. It also appears that Virginia has finally elected primacy and funded the conversion to agreement state oversight for the USNRC although that is probably a couple of years away at best and perhaps a bit too long to await license up-dating.

Listed below are a series of requests/changes that would, if approved, at least bring the major program elements/representations reasonably up to date.

**Table 1. Amendment requests to Materials License # 45-03253-02**

Materials License Item No.	Actual Title of Section on Current License.	Last amend. Date Requested Action	Requested action justification
6	By-product, Source and /or special nuclear material	Aug. 18, 2003 <b>Terminate possession for all indicated nuclides and related statements.</b>	B - I <sup>131</sup> Never Ordered -- Studies utilizing this nuclide never materialized E - Cr <sup>51</sup> Never Ordered - Studies utilizing this nuclide never materialized F - P <sup>32</sup> Last Ordered - 4/1/03 - Work with this nuclide has ceased H - Ni <sup>63</sup> 2 Sources (ECDs in GCs) were Leak tested, certificated and transferred to NRC license No..... in Nov. 2003.

**Table 2. Changes/Requested actions bearing on representations made in July 2000 on renewal application for license # 45-03253-02.**

License Application Item No.	Conditions	Section	Section Title and Requested Action	Requested action justification
9	Facilities and Equipment	9.0	Radiation and Detection Monitoring Equipment <b>Add detection equipment</b>	For detection of low level removable beta nuclides Covance purchased a Perkin Elmer Beta-Scout model 2007 Liquid Scintillation counter. EGG Wallac equipment was transferred to the Chantilly Va. Lab noted in (Item 9A - June 18, 2002).

THE AMERICAS

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AFRICA

139057

NMSS/RONI MATERIALS-002

# COVANCE

THE DEVELOPMENT SERVICES COMPANY				
10	The Radiation Safety Program	2.1	Procedures for Control of Procurement and Use.	RSO approves all requests for radioactive materials which are purchased through the Sourcing/Supply Dept.
		4.0	<b>Procedure Change</b> Program Administration <b>Name change</b>	Mr. David Lumby has been replaced by Mr. Todd Meyer who is the current Sr. Manager of the EH&S Dept.
		5.0	Radiation Safety Committee <b>Delete Committee and associated references.</b>	Radiation Safety Committee – Reduced program. Covance requests committee charter/required meeting with an annual program audit copied to all authorized individuals and Sr. Mgmt
		8.0	Bioassays <b>Delete / All related references.</b>	Bio-assay for thyroid up-takes is no longer necessary as the labeling business terminated several years ago. Currently only “kit” type assays are conducted with 0.25 millicurie or less of “bound” versus the “free” I-125 previously ordered and used.
		10.0	Radiation Surveys <b>Altered procedure</b>	Wipes for the presence of low energy beta emitters will be placed in a 20 mL liquid scintillation vial to which 10 mL of counting cock-tail is then added.
		11.1	Airborne Surveys <b>Delete / All related references</b>	Quarterly monitoring of effluent air from charcoal filter no longer applicable as iodination / labeling business is at end.
		12.0	Sealed Source Surveys <b>Delete /All related references</b>	All Ni 63 sources were transferred to sister company with approved Wisconsin agreement state license. Six month inventory and leak testing requirements no longer apply.
		15.0	Personal Monitoring Devices <b>Discontinued issuance</b>	Personal dosimeters are currently issued to all radiation workers and authorized users working with radioactive material or who are likely to receive a whole body dose in excess of 100 mRem/yr. A review of personnel dosimetry reports collected over the past 3 years, dating from the inception of program reductions, have not exceeded this limit. <b>Note:</b> In concert with 10 CFR 20.1502 Covance has discontinued use of personal dosimeters. Area specific dosimeters are however placed in radiographic/isotope handling areas.

Please call me at (703) 245-2200 ext. 5294 (new licensee contact number) or contact me via e-mail at [tim.blauvelt@covance.com](mailto:tim.blauvelt@covance.com) should you have questions or concerns regarding these requests/notifications.

Sincerely,



Tim Blauvelt  
Radiation Safety Officer

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

6/21/2006, and to inform you that the initial processing which includes an administrative review has been performed.

AMEND. 45-03253-02 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** 139057.  
When calling to inquire about this action, please refer to this control number.  
You may call us on (610) 337-5398, or 337-5260.