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Covance Laboratories Inc. 9200 Leesີ່ມີປູ່rg Pike Vienna, Virginia 22182 Tel: 703/245-22001

Fax: 703/759-694

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 AMERICAS

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 Terminate possession for all indicated nuclides and related statements.	B-I ¹³¹ Never Ordered - Studies utilizing this nuclide never materialized E-Cr ⁵¹ Never Ordered - Studies utilizing this nuclide never materialized F-P ³² Last Ordered - 4/1/03 - Work with this nuclide has ceased H-Ni ⁶³ 2 Sources (ECDs in GCs) were Leak tested, certificated and transferred to NRC license No

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 Add detection equipment	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).

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10	The Radiation Safety	2.1	Procedures for Control of Procurement and Use.	RSO approves all requests for radioactive materials which are purchased through the Sourcing/Supply Dept.
	Program	4.0	Procedure Change Program Administration Name change	Mr. David Lumby has been replaced by Mr. Todd Meyer wh the current Sr. Manager of the EH&S Dept.
		5.0	Radiation Safety Committee Delete Committee and associated references.	Radiation Safety Committee – Reduced program. Covance requests committee charter/required meeting with an annual program audit copied to all authorized individuals and Sr. Management of the second s
		8.0	Bioassays Delete / All related references.	Bio-assay for thyroid up-takes is no longer necessary as the labeling business terminated several years ago. Currently on "kit" type assays are conducted with 0.25 millicurie or less o "bound" versus the "free" I-125 previously ordered and used
		10.0	Radiation Surveys Altered procedure	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 Delete / All related references	Quarterly monitoring of effluent air from charcoal filter no longer applicable as iodination / labeling business is at end.
		12.0	Sealed Source Surveys Delete /All related references	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 Discontinued issuance	Personal dosimeters are currently issued to all radiation work and authorized users working with radioactive material or whare likely to receive a whole body dose in excess of 100 mRem/yr.
			Marketter (1995)	A review of personnel dosimetery reports collected over the past 3 years, dating from the inception of program reductions have not exceeded this limit.
			* w.	Note: In concert with 10 CFR 20.1502 Covance has discontinued use of personal dosimeters. Area specific dosimeters are however placed in radiographic/isotope handl 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 should you have questions or concerns regarding these requests/notifications.

Sincerely,

Tim Blauvelt

Radiation Safety Officer

This is to acknowledge the receipt 6/2/1/206 includes an administrative review		,
There were no administrative o	フSサーコン missions. Your application was assigned to a e that the technical review may identify additional	
Please provide to this office wit	hin 30 days of your receipt of this card	
	warded to our License Fee & Accounts Receivable rately if there is a fee issue involved.	Ĭ
	action, please refer to this control number.	
NRC FORM 532 (RI) (6-96)	Sincerely, Licensing Assistance Team Leader	