



Product Safety Laboratories

October 26, 2006

J-4
MS-16

United States Nuclear Regulatory Commission
Region 1
Attn. Elizabeth Ullrich
475 Allendale Road
King of Prussia, PA 19406-1415

RECEIVED
REGION 1
2006 OCT 27 AM 10:49

Docket No. 03037338
Control No. 139362

29-31187-d

Subject: EUROFINS SCIENTIFIC INC.D/B/A PRODUCT SAFETY LAB, REQUEST
FOE ADDITIONAL INFORMATION CONCERNING APPLICATION FOR NEW
LICENSE, CONTROL NO. 139362

Dear Ms. Ullrich:

This is in reference to your letter received October 3, 2006 regarding our application for a Nuclear Regulatory Commission License.

Item 2a. Product Safety Laboratories wishes to use a consultant, Mr. Joseph F. Viskocil, Jr. CIH, as our Radiation Safety Officer. Mr. Viskocil retired from Dupont in 2004. While at Dupont Mr. Viskocil was a Radiation Safety Officer at the Dupont Experiential Station (Broad Scope License) Wilmington, DE; at the Haskell/Stine-Haskell Site (Broad Scope License) Newark, DE; the Pencader Site (X-Ray) Newark, DE and the East Chicago, IN (Sealed Source License). Mr. Viskocil has also been a radiation consultant to the Dupont Glasgow Delaware site and the Dupont Glenolden Pennsylvania site.

Item 2b. Mr. Viskocil will have total operational control of the radiation safety program.

Item 2c. Mr. Viskocil will report directly to me.

Item 2d. Mr. Viskocil is a consultant, however at this time he has no other commitments. We expect Mr. Viskocil to average 2 hours per week. More time is expected initially during training of staff and validation of testing procedures.

Item 2e. In Mr. Viskocil's absence Mr. Peter Barbounis, the Assistant RSO will monitor the radiation safety program. Mr. Barbounis has successfully completed a 40-hour radiation safety program for radiation safety officers and we anticipate Mr. Barbounis to become the Radiation Safety Officer in a year or so with your approval.

REC'D IN LAT 10/26/2006

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NMSS/RGNI MATERIALS-002



Product Safety Laboratories

Item 2f. Mr. Viskocil works from his home in Hockessin, Delaware. This is slightly less than two (2) hours travel time from our facility. We believe that Mr. Barbounis will be able to oversee the day to day operations of the program. Mr. Viskocil has provided us with his home and cell phone telephone numbers. We have taken steps to minimize the material handled and stored on site.

Item 3. Some users have had some or all of the training identified in item 3. All authorized users will receive training in these areas prior to handling any radioactive material.

Item 4. Please see attached procedure based on Appendix P of NUREG-1556 Volume 7

Item 5a. Animals will be stored in a 10 foot by 110 foot secured room until the day of radiolabeling. They will be moved into a 9 foot by 16 foot room, where they will remain for 5 hours post radiolabeling, at which time they will be euthanized. The room consists of epoxy floors and epoxy resin non-permeable counter tops. Counter tops will be covered with absorbent paper while radiolabeling. A laboratory hood is to be used for sample dilution and preparation. Animal carcasses will be stored in a -20°C freezer until picked up for proper disposal.

Item 5b. Before the introduction of radioactive material, individuals caring for animals exposed to licensed material will receive training in the following areas: principles and practices of radiation protection, radioactivity measurements, mathematics and calculations basic to the use and measurement of radioactivity and the biological effects of radiation.

Item 5c. Animal caretakers will be trained in accordance with guidelines published in Appendix H to NUREG-1556, Vol. 7, 'Program-Specific Guidance About Academic, Research and Development and Other Licenses of Limited Scope,' dated December 1999.

Item 5d. At this time, we plan to inject 100 mice per week with 20 microcuries of tritiated thymidine. We expect this to take place on Tuesdays. After approximately 5 hours the animals are sacrificed and the appropriate tissues removed and analyzed.

Item 6. Packaging and transport of radioactive waste will be handled by ONYX ENVIRONMENTAL SERVICES of Flanders, NJ (New Jersey Division of Solid and Hazardous Waste License Numbers D92163 and YKN8561) or an equivalent vendor. Radioactive waste will be disposed of at the radioactive material waste site in Oak Ridge, TN (License number R-73008-C14) or Wampum, PA (License number 37-20826-02).

Sincerely,

A handwritten signature in black ink, appearing to read "Gary Wnorowski".

Gary Wnorowski
President



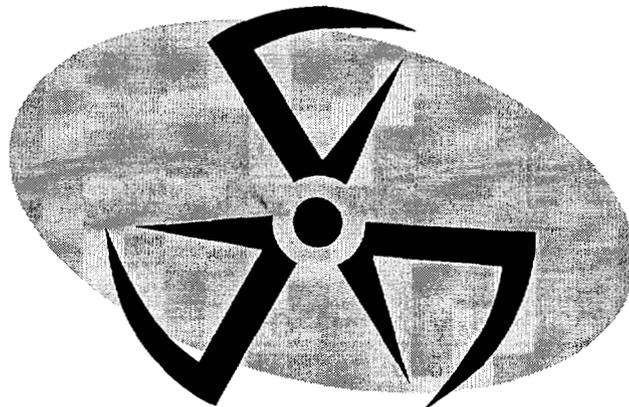
Product Safety Laboratories

DAYTON, NJ

Radioactive Emergency Procedures

September 2006

DAYTON, NJ



General Safe Use of Radioisotopes

- Wear a laboratory coat or other protective clothing at all time were licensed material is being used.
- Wear a double layer of disposable gloves when handling licensed material.
- Never pipette by mouth
- After each procedure or before leaving the area, monitor hands, shoes, and clothing for contamination using a wipe test.
- Do not eat, drink, smoke or apply cosmetics in any area where licensed material is stored or used.
- Do not store, food, drink or personal effects in any area where licensed material is stored or used.
- Dispose of radioactive waste only in designated, labeled and properly shielded receptacles.
- Store radioactive solutions in clearly labeled containers.
- Secure all licensed material when it is not under the constant surveillance and immediate control of the user(s).

Safety Procedures to handling spills

If a radioactive spill occurs, a spill kit will be readily available in the area for appropriate pick up. The spill kit will the containing the following items but are not limited to this list.

- ✓ Disposable gloves
- ✓ Housekeeping gloves
- ✓ Disposable lab coats
- ✓ Disposable shoe covers
- ✓ Roll of absorbent paper with plastic backing
- ✓ Masking tape
- ✓ Plastic trash bags with twist ties
- ✓ "Radioactive Material" labeling tape
- ✓ Marking pen
- ✓ Pre-strung "Radioactive Material" labeling tags
- ✓ Box of Wipes
- ✓ Instructions for "Emergency Procedures"
- ✓ Clipboard with a copy of the Radioactive Spill Report Form for EPSL
- ✓ Appropriate survey instruments.

Minor Spills of Liquids and Solids

Any spill under 50 millicuries is considered a minor spill. The following procedures will be followed for minor spills:

- Notify persons in the area that a spill has occurred
- Prevent the spread of contamination by covering the spill with absorbent paper. (Paper should be dampened if solids are spilled)
- Clean up the spill, wearing disposable gloves and using absorbent paper
- Carefully fold the absorbent paper with the clean side out and place in plastic bag for transfer to a radioactive waste container. Put contaminated disposable material in the bag.
- Survey the area with appropriate surveying technique. Also check hands, clothing and shoes for contamination.
- Report the incident to the Radiation Safety Officer (RSO) promptly.
- Allow no one to return to the work area unless approved by the RSO
- Cooperate with RSO (e.g., investigation of root cause, provision of requested bioassay samples)
- Follow the instructions of the RSO (e.g., decontamination techniques, surveys, provision of bioassay samples, requested documentation)

Major Spills of Liquids and Solids

Any spill over 50 millicuries is considered a major spill. The following procedures will be followed for major spills:

- Clear the area. If appropriate, survey all persons not involved in the spill and vacate the room.
- Prevent the spread of contamination by covering the spill with absorbent paper (paper should be dampened if solids are spilled), but do not attempt to clean it up. To prevent the spread of contamination, limit the movement of all personnel who may be contaminated.
- Shield the source only if it can be done without further contamination or significant increase in radiation exposure.
- Close the room and lock or otherwise secure the area to prevent entry. Post the room with a sign to warn anyone trying to enter that a spill of radioactive material has occurred.
- Notify the RSO immediately.
- Survey all personnel who could possibly have been contaminated. Decontaminate personnel by removing contaminated clothing and flushing contaminated skin with lukewarm water and then washing with a mild soap.

- Allow no one to return to work in the area unless approved by the RSO.
- Cooperate with RSO(e.g., investigation of root cause, provision of requested bioassay samples)
- Follow the instructions of the RSO (e.g., decontamination techniques, surveys, provision of bioassay samples, requested documentation)

Incidents Involving Radioactive Dusts, Mists, Fumes, Organic Vapors and Gases

- Notify all personnel to vacate the room immediately.
- Shut down the ventilation system, if appropriate, to prevent the spread of contamination throughout system and other parts of the facility
- Vacate the room. Seal the area, if possible.
- Notify the RSO immediately.
- Ensure that all access doors to the area are closed and posted with radiation warning signs, or post trained personnel at all access doors to prevent accidental opening of the doors or entry to the area
- Survey all persons who could have possibly been contaminated. Decontaminate as directed by the RSO.
- Promptly report suspected inhalation and ingestions of licensed material to the RSO.
- Decontaminate the area only when advised/and or supervised by the RSO.
- Allow no one to return to work in the are unless approved by the RSO.
- Cooperate with RSO(e.g., investigation of root cause, provision of requested bioassay samples)
- Follow the instructions of the RSO (e.g., decontamination techniques, surveys, provision of bioassay samples, requested documentation)

MINOR FIRES

- Immediately attempt to put out the fire by approved methods (i.e., fire extinguisher) if other fire hazards or radiation hazards are not present.
- Notify all persons present to vacate the area and have one individual immediately call the RSO and fire department (as instructed by the RSO).
- Once the fire is out, isolate the area to prevent the spread of possible contamination.
- Survey all persons involved in combating the fire for possible contamination.

- Decontaminate personnel by removing contaminated clothing and flushing contaminated skin with lukewarm water, then washing with a mild soap.
- In consultation with the RSO, determine a plan of decontamination and the types of protective devices and survey equipment that will be necessary to decontaminate the area.
- Allow no one to return to the area unless approved by the RSO.
- Cooperate with RSO(e.g., investigation of root cause, provision of requested bioassay samples)
- Follow the instructions of the RSO (e.g., decontamination techniques, surveys, provision of bioassay samples, requested documentation)

MAJOR EMERGENCIES, FIRES OR EXPLOSIONS

- Notify all persons in the area to leave immediately
- Notify the Fire Department
- Notify the RSO and other facility safety personnel.
- Upon arrival of firefighters, inform them where radioactive materials are stored or where radioisotopes were being used; inform them of the present location of the licensed material and the best possible entrance route to the radiation area, as well as any precautions to avoid exposure or risk of creating radioactive contamination by use of high pressure water, etc.
- Cooperate with RSO(e.g., investigation of root cause, provision of requested bioassay samples)
- Allow no one to return to the area unless approved by the RSO.
- Follow the instructions of the RSO (e.g., decontamination techniques, surveys, provision of bioassay samples, requested documentation)

EMERGENCIES, FIRES OR EXPLOSIONS