UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION III
2443 WARRENVILLE ROAD, SUITE 210
LISLE, ILLINOIS 60532-4352

TELEFAX TRANSMITTAL

DATE: May 2, 2007 NUMBER OF PAGES: 26
(Including this page)

SEND TO: Ronald Koglin - Radiation Safety Officer - OR - Sachitanand Karnakote

LOCATION: Dunn Paper, Inc.

FAX NUMBER: (810) 984-5830 ☒ ***VERIFY BY CALLING SENDER***

FROM:
(SENDER) **Bill Reichhold**

TELEPHONE NUMBER **(630) 829-9839** FAX NUMBER **(630) 515-1078**

If you do not receive the complete fax transmittal, please contact the sender as soon as possible at the telephone number provided above.

MESSAGE

Please see accompanying documents.

NOTICE

This message is intended only for the use of the individual or entity to which it is addressed and may contain information that is privileged, confidential, or exempt from disclosure under applicable law. If the reader of this message is not the intended recipient or the employee responsible for delivering the message to the intended recipient, you are hereby notified that any dissemination, distribution or copying of this communication is strictly prohibited. If you have received this communication in error, please notify the sender immediately by telephone and return the original to the above address, by U.S. Mail. Thank you.

The NRC has published new guidance for completing license applications. Please resubmit your renewal request in accordance with the new guidance in NUREG-1556, Volume 4 (fixed gauges), NUREG-1556, Volume 7 (gas chromatographs) and NUREG-1556, Volume 15 (change of ownership). These documents may be found on our website at:

http://www.nrc.gov/reading-rm/doc-collections/nuregs/staff/sr1556/v4/index.html
http://www.nrc.gov/reading-rm/doc-collections/nuregs/staff/sr1556/v7/index.html
http://www.nrc.gov/reading-rm/doc-collections/nuregs/staff/sr1556/v15/

In addition, regarding the change of ownership from Curtis Papers to Dunn Papers, please provide documentation that:

a. the transferor and transferee agree to the change in ownership or control of the licensed material and activity, and
b. the conditions of transfer, and
c. the transferee is made aware of all open inspection items and possible resulting enforcement actions.

I have only faxed the checklists and some instructions for the gas chromatograph. You may find the instructions for completing the checklists in the NUREG documents listed above.

Please send a facsimile of your response to the above within 14 days and refer to control *316045*. Please call me at 630-829-9839 if you have any questions.

From the desk of:

Bill Reichhold

Bill Reichhold

Appendix F

Faxable Version of Information Needed for Transfer of Control Application

USNRC Region _____ **Contact:** _____
Telephone: (___) ___-_____ **Fax:** (___) ___-_____

Information Needed for Transfer of Control

Definitions:

Control: Control of a license is in the hands of the person or persons who are empowered to decide when and how that license will be used. That control is to be found in the person or persons who, because of ownership or authority explicitly delegated by the owners, possess the power to determine corporate policy and thus the direction of the activities under the license.

Transferee: A transferee is an entity that proposes to purchase or otherwise gain control of an NRC-licensed operation.

Transferor: A transferor is an NRC licensee selling or otherwise giving up control of a licensed operation.

Licensees must provide full information and obtain NRC's ***prior written consent*** before transferring control of the license. Provide the following information concerning changes of control by the applicant (transferor and/or transferee, as appropriate). If any items are not applicable, so state.

1. Provide a complete description of the transaction (transfer of stocks or assets, or merger). Indicate whether the name has changed and include the new name. Include the name and telephone number of a licensee contact who NRC may contact if more information is needed.

2. Describe any changes in personnel or duties that relate to the licensed program. Include training and experience for new personnel.

3. Describe any changes in the organization, location, facilities, equipment or procedures that relate to the licensed program.

4. Describe the status of the surveillance program (surveys, wipe tests, quality control) at the present time and the expected status at the time that control is to be transferred.

5. Confirm that all records concerning the safe and effective decommissioning of the facility will be transferred to the transferee or to NRC, as appropriate. These records include documentation of surveys of ambient radiation levels and fixed and/or removable contamination, including methods and sensitivity.

6. Confirm that the transferee will abide by all constraints, conditions, requirements and commitments of the transferor or that the transferee will submit a complete description of the proposed licensed program.

Appendix A

NRC Form 313

NRC FORM 313 (5-1997) 10 CFR 30, 32, 33 34, 35, 36, 39 and 40

U. S. NUCLEAR REGULATORY COMMISSION

APPLICATION FOR MATERIAL LICENSE

APPROVED BY OMB: NO. 3150-0120 EXPIRES: 7/31/1999

Estimated burden per response to comply with this information collection request: 7 hours. Submittal of the application is necessary to determine that the applicant is qualified and that adequate procedures exist to protect the public health and safety. Forward comments regarding burden estimate to the Information and Records Management Branch (T-6 F33), U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001, and to the Paperwork Reduction Project (3150-0120), Office of Management and Budget, Washington, DC 20503. NRC may not conduct or sponsor, and a person is not required to respond to, an information collection unless it displays a currently valid OMB control number.

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:

LICENSING ASSISTANT SECTION
NUCLEAR MATERIALS SAFETY BRANCH
U.S. NUCLEAR REGULATORY COMMISSION, REGION I
475 ALLENDALE 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:

ATLANTA FEDERAL CENTER
U. S. NUCLEAR REGULATORY COMMISSION, REGION II
61 FORSYTH STREET, S.W., SUITE 23T85
ATLANTA, GEORGIA 30303-3415

IF YOU ARE LOCATED IN:

ILLINOIS, INDIANA, IOWA, MICHIGAN, MINNESOTA, MISSOURI, OHIO, OR WISCONSIN, SEND APPLICATIONS TO:

MATERIALS LICENSING SECTION
U.S. NUCLEAR REGULATORY COMMISSION, REGION III
801 WARRENVILLE RD.
LISLE, IL 60532-4351

ALASKA, ARIZONA, ARKANSAS, CALIFORNIA, COLORADO, HAWAII, IDAHO, KANSAS, LOUISIANA, MONTANA, NEBRASKA, NEVADA, NEW MEXICO, NORTH DAKOTA, OKLAHOMA, OREGON, PACIFIC TRUST TERRITORIES, SOUTH DAKOTA, TEXAS, UTAH, WASHINGTON, OR WYOMING, SEND APPLICATIONS TO:

NUCLEAR MATERIALS LICENSING SECTION
U.S. NUCLEAR REGULATORY COMMISSION, REGION IV
611 RYAN PLAZA DRIVE, SUITE 400
ARLINGTON, TX 76011-8064

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)*

3. ADDRESS(ES) WHERE LICENSED MATERIAL WILL BE USED OR POSSESSED

4. NAME OF PERSON TO BE CONTACTED ABOUT THIS APPLICATION

TELEPHONE NUMBER

SUBMIT ITEMS 5 THROUGH 11 ON 8-1/2 X 11" PAPER. THE TYPE AND SCOPE OF INFORMATION TO BE PROVIDED IS DESCRIBED IN THE LICENSE APPLICATION GUIDE.

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.

8. TRAINING FOR INDIVIDUALS WORKING IN OR FREQUENTING RESTRICTED AREAS.

9. FACILITIES AND EQUIPMENT.

10. RADIATION SAFETY PROGRAM.

11. WASTE MANAGEMENT.

12. LICENSEE FEES *(See 10 CFR 170 and Section 170.31)*

FEE CATEGORY	AMOUNT ENCLOSED $

13. CERTIFICATION. *(Must be completed by applicant)* THE APPLICANT UNDERSTANDS THAT ALL STATEMENTS AND REPRESENTATIONS MADE IN THIS APPLICATION ARE BINDING UPON THE APPLICANT.

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, 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 62 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 – TYPED/PRINTED NAME AND TITLE	SIGNATURE	DATE

FOR NRC USE ONLY

TYPE OF FEE	FEE LOG	FEE CATEGORY	AMOUNT RECEIVED $	CHECK NUMBER	COMMENTS
APPROVED BY				DATE	

NRC FORM 313 (5-1997) PRINTED ON RECYCLED PAPER

Appendix B

Suggested Format for Providing Information Requested in Items 5 Through 11 of NRC Form 313

Suggested Format for Providing Information Requested in Items 5 Through 11 of NRC Form 313

Table B.1 Items 5 & 6: Materials To Be Possessed and Proposed Uses

Yes	No	Radioisotope	Manufacturer or Distributor Model No.	Quantity	Use As Listed on SSD Certificate	Specify Other Uses Not Listed on SSD Certificate
		Cobalt-60	Sealed source manufacturer or distributor and model number: _____ Device manufacturer or distributor and model number: _____	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: _____	[ ] Not applicable _____ [ ] Uses are: _____ (Submit safety analysis supporting safe use)
		Krypton-85	Sealed source manufacturer or distributor and model number: _____ Device manufacturer or distributor and model number: _____	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: _____	[ ] Not applicable _____ [ ] Uses are: _____ (Submit safety analysis supporting safe use)
		Strontium-90	Sealed source manufacturer or distributor and model number: _____ Device manufacturer or distributor and model number: _____	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: _____	[ ] Not applicable _____ [ ] Uses are: _____ (Submit safety analysis supporting safe use)
		Cesium-137	Sealed source manufacturer or distributor and model number: _____ Device manufacturer or distributor and model number: _____	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: _____	[ ] Not applicable _____ [ ] Uses are: _____ (Submit safety analysis supporting safe use)

Yes	No	Radioisotope	Manufacturer or Distributor Model No.	Quantity	Use As Listed on SSD Certificate	Specify Other Uses Not Listed on SSD Certificate
		Americium-241	Sealed source manufacturer or distributor and model number: _____ Device manufacturer or distributor and model number: _____	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: _____ _____ _____ _____ _____ _____ _____	[ ] Not applicable _____ [ ] Uses are: _____ (Submit safety analysis supporting safe use)
		Other Isotope (Specify):	Sealed source manufacturer or distributor and model number: _____ Device manufacturer or distributor and model number: _____	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: _____ _____ _____ _____ _____ _____ _____	[ ] Not applicable _____ [ ] Uses are: _____ (Submit safety analysis supporting safe use)
		Financial Assurance Required and Evidence of Financial Assurance Provided				

Table B.2 Items 7 Through 11: Training and Experience, Facilities and Equipment, Radiation Safety Program, and Waste Disposal

Item No. and Title	Suggested Response	Yes	Alternative Procedures Attached
7. Individual(s) Responsible For Radiation Safety Program And Their Training And Experience 7.1 Radiation Safety Officer Name: _____	Before obtaining licensed materials, the proposed RSO will have successfully completed the training described in Criteria in the section entitled "Individual(s) Responsible for Radiation Safety Program and Their Training and Experience - Radiation Safety Officer" in NUREG-1556, Vol. 4, dated October 1998. **AND** Before being named as the RSO, future RSOs will have successfully completed the training described in Criteria in the section entitled "Individual(s) Responsible for Radiation Safety Program and Their Training and Experience - Radiation Safety Officer" in NUREG-1556, Vol. 4, dated October 1998. Within 30 days of naming a new RSO, we will submit the new RSO's name to NRC to include in our license.	[ ]	[ ]
7. Individual(s) Responsible For Radiation Safety Program And Their Training And Experience **7.2 Authorized Users**	**PROPOSED AUTHORIZED USERS:** **Before using licensed materials, authorized users will have successfully completed the training described in Criteria in the section entitled, "Authorized Users" in NUREG-1556, Vol. 4, dated October 1998.**	[ ]	[ ]
8. Training for Individuals Who in the Course of Employment are Likely to Receive Occupational Doses of Radiation in Excess of 1 mSv (100 mrem) in a Year (Occupationally Exposed Workers) and Ancillary Personnel	The applicant is *not* required to, and should not, submit is training program, for individuals who in the course of employment are likely to receive occupational doses of radiation in excess of 1 mSv (100 mrem) in a year (occupationally exposed workers) and ancillary personnel, to the NRC for review during the licensing phase.	Need Not Be Submitted with Application	
9. Facilities and Equipment	We will ensure that the location of each fixed gauge meets the Criteria in the section entitled "Facilities and Equipment" in NUREG-1556, Vol. 4, dated ~~August~~ OCTOBER 1998.	[ ]	[ ]

Item No. and Title	Suggested Response	Yes	Alternative Procedures Attached
10. Radiation Safety Program - Audit Program	The applicant is *not* required to, and should not, submit its audit program to the NRC for review during the licensing phase.	Need Not Be Submitted with Application	
10. Radiation Safety Program - Survey Instruments	Surveys pursuant to 10 CFR 20.1501 will be performed by a person specifically authorized by the NRC or an Agreement State to perform these surveys. **OR** We will use instruments that meet the Criteria in the section entitled "Radiation Safety Program - Instruments," in NUREG-1556, Vol. 4, dated ~~August~~ OCTOBER 1998, and *one* of the following: Each survey meter will be calibrated by the manufacturer or other person authorized by the NRC or an Agreement State to perform survey meter calibrations. **OR** We will implement the model survey instrument calibration program in Appendix I to NUREG-1556, Vol. 4, dated ~~August 1998~~. OCTOBER 1998.	[ ]	[ ]
10. Radiation Safety Program - Material Receipt and Accountability	Physical inventories will be conducted at intervals not to exceed 6 months or at other intervals approved by the NRC, to account for all sealed sources and devices received and possessed under the license.	[ ]	[ ]
10. Radiation Safety Program - Occupational Dosimetry	We will perform a prospective evaluation demonstrating that unmonitored individuals are not likely to receive, in one year, a radiation dose in excess of 10% of the allowable limits in 10 CFR Part 20 or we will provide dosimetry that meets the Criteria in the section entitled "Radiation Safety Program - Occupational Dosimetry," in NUREG-1556, Vol. 4, dated ~~August 1998~~. OCTOBER 1998.	[ ]	[ ]
10. Radiation Safety Program - Public Dose	The applicant is not required to submit a response to the public dose section during the licensing phase. However, during NRC inspections, licensees must be able to provide documentation demonstrating, by measurement or calculation, that the total effective dose equivalent to the individual likely to receive the highest dose from the licensed operation does not exceed the annual limit for individual members of the public.	Need Not Be Submitted with Application	

Item No. and Title	Suggested Response	Yes	Alternative Procedures Attached
10. Radiation Safety Program - Operating & Emergency Procedures	If the gauge meets one or more of the safety conditions specified in "Discussion,"in the section entitled "Radiation Safety Program-Operating Emergency Procedures," in NUREG 1556, Vol. 4, dated ~~August~~ OCTOBER 1998 state the following:	[ ]	[ ]
	Operating and emergency procedures will be developed, implemented, maintained, and distributed, and will meet the Criteria in the section entitled "Radiation Safety Program - Operating and Emergency Procedures," in NUREG-1556, Vol. 4, dated ~~August~~ OCTOBER 1998.		
	For each gauge requested that does not meet one or more of the safety conditions specified in "Discussion," in the section entitled "Radiation Safety Program-Operating Emergency Procedures," in NUREG 1556, Vol. 4, dated ~~August~~ OCTOBER 1998 provide your operating, emergency and lock-out (if applicable) procedures to NRC for review.	[ ] Procedures Attached	
10. Radiation Safety Program - Leak Test	Leak tests will be performed at intervals approved by the NRC or an Agreement State and specified in the Sealed Source and Device Registration Certificate. 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.	[ ]	[ ]
	OR		
	We will implement the model leak test program published in Appendix M to NUREG-1556, Vol. 4, dated ~~August~~ OCTOBER 1998.	[ ]	

Item No. and Title	Suggested Response	Yes	Alternative Procedures Attached
10. Radiation Safety Program - Maintenance	ROUTINE MAINTENANCE We will implement and maintain procedures for routine maintenance of our fixed gauges according to each manufacturer's or distributor's written recommendations and instructions.	[ ]	[ ]
	NON-ROUTINE MAINTENANCE OPERATIONS The gauge manufacturer, distributor or other person authorized by NRC or an Agreement State will perform non-routine operations such as installation, initial radiation survey, repair, and maintenance of components related to the radiological safety of the gauge, gauge relocation, replacement, and disposal of sealed sources, alignment, or removal of a gauge from service.	[ ]	[ ] The information listed in Appendix N supporting a request to perform non-routing operations in-house is attached
10. Radiation Safety Program - Transportation	The applicant is *not* required to submit its response to transportation during the licensing process; this issue will be reviewed during inspection. However, the licensee should develop, implement, and maintain transportation procedures according to NRC and DOT regulations.	Need Not Be Submitted with Application	
10. Radiation Safety Program - Fixed Gauges Used at Temporary Job Sites	This is not applicable to our program. We will not use fixed gauges at temporary job sites.	[ ] Not Applicable	
	OR		
	We will develop, implement, maintain and distribute procedures that meet the Criteria in the section entitled "Radiation Safety Program - Fixed Gauges Used at Temporary Job Sites" in NUREG-1556, Vol. 4, dated ~~August~~ OCTOBER 1998.	[ ]	[ ]
10. Radiation Safety Program - Minimization of Contamination	The applicant is not required to submit a response to minimization of contamination if the applicant's responses meet the criteria for the following sections: Radioactive Material - Sealed Sources and Devices, Facilities and Equipment, Radiation Safety Program - Operating and Emergency Procedures, Radiation Safety Program - Leak Testing, and Waste Management - Gauge Transfer and Disposal.	Need Not Be Submitted with Application	

Item No. and Title	Suggested Response	Yes	Alternative Procedures Attached
11. Waste Management - Gauge Disposal & Transfer	The applicant is not required to submit a response to waste management during the licensing process. However, the licensee should develop, implement, and maintain gauge transfer and disposal procedures in its radiation protection program.	Need Not Be Submitted with Application	

Appendix D

Gas Chromatography Devices and X-ray Fluorescence Analyzer Applications

Gas Chromatography Devices and X-ray Fluorescence Analyzer Applications

This appendix is designed either to assist the applicant with obtaining a separate license for a gas chromatograph (GC) and/or an X-RAY fluorescence analyzer (XRF) or to be used as part of a license application that may contain other requested radioisotopes and proposed uses.

Regulations

Licensees are subject to all applicable provisions of the regulations in 10 CFR Parts 20, 21, 30, 71, 170 as they pertain to GC and XRFs.

Information for completing Items 1 through 4 of the application have already been provided in this NUREG.

Additional information for Item 3 is requested below.

Item 3: Address(es) Where Licensed Material Will Be Used or Possessed

Specify the street address, city, and state or other descriptive address (e.g., on Highway 10, 5 miles east of the intersection of Highway 10 and State Route 234, Anytown, State) for each facility at which licensed material will be used or stored. A Post Office Box address is not acceptable. In addition, state whether GC/XRFs will be used at temporary jobsites.

Item 5: Material to Be Possessed

1 Provide the radioisotopes(s) that will be used in each GC/XRF.

2. Provide the manufacturer and model number of the detector cell, foil source, plated source, or sealed source that will be used in each GC/XRF.

3. Specify the quantity (activity) of radioactive material that will be in each foil source, plated source, or other sealed source. Provide the number of sources of each foil source, plated source or sealed source that will be possessed, if known. If the total number for each type of source is unknown, provide an anticipated total.

Note: GCs that contain titanium tritide foils or scandium tritide foils require operating temperature control mechanisms and venting to the outside. Provide information on operating temperature controls and venting information with the application, if these kinds of foils are requested in the application. See license condition no. 15 of the sample GC at the end of this appendix.

Item 6: Purpose For Which Licensed Material Will Be Used

Specify the purpose for which each GC/XRF will be used.

Note: For use of portable GCs and/or XRFs, refer to NUREG - 1556, Vol. 1, for additional guidance about portable devices containing licensed material.

Item 7: Individual(s) Responsible For Radiation Safety Program And Their Training And Experience - Radiation Safety Officer

Provide the name of the person(s) who will be responsible for the GCs/ XRFs. That person(s) will be specifically named on the license.

If no repair or maintenance on the GC/XRFs is proposed by the applicant, then no specific training and experience in the use and handling of radioactive materials is necessary for individuals who will use the device(s) or supervise its use. No special training or experience is needed to perform leak tests using a leak-test kit or to clean detector cells used in GC devices, provided the source or foil is not removed from the detector cell.

If the applicant proposes to perform any operations that involve removal of sources containing radioactive material from the device or maintenance and repair of a device that involves the source, then they must ensure a "responsible individual" performs these operations. The responsible individual shall have received instruction and training in the principles and practices of radiation safety, the use of radiation detection instruments, and the performance of these operations. Such training may normally be accomplished in 1 or 2 days. In the application, provide the following information:

- Name of each responsible individual who will perform the operations
- Outline of the instruction and training each responsible individual has received in the principles and practices of radiation safety, the use of radiation detection instruments, and the operations that will be performed, including actual practice in performing the operations. The amount of time spent on each topic in the training should be specified.

Item 8: Training Provided to Other Users

Persons who will only use a GC or XRF under the supervision of the responsible individual named in Item 7 need no special training and their names do not need to be submitted. These supervised individuals should not be permitted to perform any maintenance or repair operations. Only responsible individuals specifically named in Item 7 shall perform such operations.

Item 9: Facilities And Equipment

10 CFR 30.33(a)(2) states that an application will be approved if the applicant's proposed equipment and facilities are adequate to protect health and to minimize danger to life or property. 10 CFR 20.1801 and 20.1802 also state that licensed material stored in an unrestricted area must be secured from unauthorized removal, and licensed materials in an unrestricted area and not in storage must be under the constant surveillance and immediate control of the licensee.

The room, laboratory, or storage area in which the device is located should be (1) accessible only to persons authorized to use the device and (2) locked when an authorized person is not physically present. The application should state that the laboratory or area will be locked or secured when an authorized person is not present. The room, laboratory, or storage area cannot be considered a restricted area if it is accessible to unauthorized persons.

Item 10: Radiation Safety Program

10.1 Audit Program

Licensees must review the content and implementation of their radiation protection programs annually, to ensure compliance with NRC regulations and with the terms and conditions of the license. Appendix J contains a suggested audit program that is acceptable to NRC. All areas indicated in Appendix J may not be applicable to every licensee and may not need to be addressed during each audit.

10.2 Radiation Detection Instruments

A survey meter for routine uses of GC/XRF is not required.

If maintenance and repair operations are proposed as described in Item 7, and the operations involve the sealed source, provide information about what surveys will be performed, what type of survey meter will be used for conducting surveys, the range of the survey instrument, and calibration information including frequency of calibration. It is not necessary to specify the manufacturer and model number of the survey meter. For more information on survey meters, see "Radiation Safety Program - Instruments," in the main body of this NUREG.

10.3 Material Receipt and Accountability

Licensees are required to maintain records of receipt, transfer, and disposal of licensed material. Loss, theft, or misplacement of licensed material can occur; therefore control and accountability of GC/XRFs must be ensured. Licensees who use and/or possess sealed sources are required by license conditions to perform inventories of sealed sources every six months (see sample license, condition no. 16). Some sealed sources may not be in use or are rarely used and are placed in

storage. In these cases, licensees should confirm that these sealed sources have not been disturbed at least every 6 months.

10.4 Personnel Monitoring Equipment

Personnel monitoring devices are not required for the following:

- Routine use and normal operation of GC/XRFs
- Maintenance and repair operations described in Item 7, if the radiation source in the GC/XRF is in a gaseous form or is nickel-63 (Ni-63).

If proposed uses of GC/XRFs include the maintenance and repair operations described in Item 7, and these operations involve sealed sources other than in gaseous form or Ni-63, an evaluation for personnel monitoring devices is required for persons performing these operations.

The application should indicate that maintenance and/or repair personnel will be provided with either film badges or thermoluminescence dosimeters (TLDs) for use while performing service operations or provide a dose evaluation which indicates that personnel will not be required to wear monitoring devices.

10.5 Leak-Testing

NRC requires testing to determine whether there is any radioactive leakage from sealed/plated foil sources. Records of surveys and leak tests results must be maintained.

When issued, a license will require performance of leak tests of sealed/plated foil sources at intervals as approved by NRC or an Agreement State and specified by the SSD Registration Certificate. The measurement of the leak-test sample is a quantitative analysis requiring that instrumentation used to analyze the sample be capable of detecting 185 Bq (0.005 μCi) of radioactivity.

Manufacturers, consultants, and other organizations may be authorized by NRC or an Agreement State either to perform the entire leak test sequence for other licensees or to provide leak test kits to licensees. In the latter case, the licensee is expected to take the leak test sample according to the sealed source or plated foil manufacturer's (distributor's) and the kit supplier's instructions and return it to the kit supplier for evaluation and reporting results. Leak test samples should be collected at the most accessible area where contamination would accumulate if the sealed source were leaking. Licensees may also be authorized to conduct the entire leak test sequence themselves. For more information about leak testing sealed/plated foil sources, see "Radiation Safety Program - Surveys," in the main body of this NUREG.

10.6 Maintenance and Repair

If authorization has been requested to perform maintenance and repair operations as stated in Item 7, then state in the application that the written procedures provided by the device manufacturer will be followed for each such operation requested. If a procedure will be followed other than that provided by the device manufacturer, submit a proposed procedure to use for each operation requested.

10.7 Transportation

If authorization has been requested in the application to use GC/XRFs at a temporary jobsite, the applicant must take into consideration DOT regulations, particularly blocking and bracing the device containing licensed material. The applicant is not required to submit transportation information with the application.

10.8 Minimization of contamination

New license applicants are required by 10 CFR 20.1406 to describe how facility design and procedures for operation will minimize, to the extent practicable, contamination of the facility and the environment, facilitate eventual decommissioning, and minimize, to the extent practicable, the generation of radioactive waste.

Item 11: Waste Management

Because of the nature of the licensed material contained in GC/XRF devices, the usual disposal option is to transfer the licensed material to an authorized recipient. State in the application that disposal will be by transfer of the radioactive material to a licensee specifically authorized to possess it, or provide information for an alternate method of disposal for NRC review.

Authorized recipients are the original supplier of the device, a commercial firm licensed by NRC or an Agreement State to accept radioactive waste from other persons, or another specific licensee authorized to possess the licensed material. No one else is authorized to receive licensed material.

Suggested Format for Providing Information Requested in Items 1 through 4 of NRC Form 313

D.1 ITEM 1: ACTION TYPE

ACTION TYPE:	ADMINISTRATIVE REVIEW:
[ ] New [ ] Amendment [ ] Renewal	[ ] Current Guidance Used [ ] References in Application Based On Current Regulations [ ] All Attachments Referenced Included [ ] Signature on Application

D.2 ITEM 2: LEGAL IDENTITY

NAME:	

D.3 ITEMS 2 & 3: ADDRESS

STORAGE & LOCATION OF USE ADDRESS:	MAILING ADDRESS:
Temporary Job Sites [ ] YES [ ] NO	

D.4 ITEM 4: PERSON TO BE CONTACTED ABOUT THIS APPLICATION

CONTACT PERSON:	
TELEPHONE NUMBER:	

Suggested Format for Providing Information Requested in Items 5 through 11 of NRC Form 313.

D.5 ITEMS 5 & 6: MATERIALS TO BE POSSESSED AND PROPOSED USES

Yes	No	Radioisotope	Mfg/model No.	Quantity	Purpose of Use	Specify Other Uses Not Listed on SSD Certificate
		Hydrogen-3[1]	Sealed sources in a compatible device as specified in Sealed Source and Device Registration Sheet	Not to exceed maximum activity per source as specified in Sealed Source and Device Registration Sheet	Measure Physical Properties of Materials	[ ] Not applicable ___ [ ] Uses are:
		Nickel-63	Sealed sources in compatible device as specified in Sealed Source and Device Registration Sheet	Not to exceed maximum activity per source as specified in Sealed Source and Device Registration Sheet	Measure Physical Properties of Materials	[ ] Not applicable ___ [ ] Uses are:
		Americium-241	Sealed sources in compatible device as specified in Sealed Source and Device Registration Sheet	Not to exceed maximum activity per source as specified in Sealed Source and Device Registration Sheet	Measure Physical Properties of Materials	[ ] Not applicable ___ [ ] Uses are:

Yes	No	Radioisotope	Mfg/model No.	Quantity	Purpose of Use	Specify Other Uses Not Listed on SSD Certificate
		Other (specify)				

[1] If titanium tritide foils or scandium tritide foils are requested, provide operating temperature control and venting information. (See "Note" in Item 5 of this appendix.)

D.6 ITEMS 7 THROUGH 11: TRAINING AND EXPERIENCE, FACILITIES AND EQUIPMENT, RADIATION SAFETY PROGRAM, AND WASTE DISPOSAL

Item No.	Title and Criteria	Yes	Description Attached
7	**INDIVIDUAL(S) RESPONSIBLE FOR RADIATION SAFETY PROGRAM AND THEIR TRAINING EXPERIENCE** **RSO** Name: _____		
	Before obtaining licensed materials, the proposed RSO will have successfully completed the training described in Appendix D, in NUREG - 1556, Vol. 7.	[ ]	[ ]
	AND		
	Before being named as the RSO, future RSOs will have successfully completed the training described in Appendix D, in NUREG - 1556, Vol. 7.	[ ]	
8	**TRAINING FOR INDIVIDUALS WORKING IN OR FREQUENTING RESTRICTED AREAS** Individuals working under the supervision of a responsible person named in item 7, above, are not required to have any specific radiation safety training prior to using a GC/XRF.	N/A	

Item No.	Title and Criteria	Yes	Description Attached
9	**FACILITIES AND EQUIPMENT** Describe the facilities where GC/XRFs will be used and stored. Additional information regarding the use and storage of GC/XRFs at a temporary jobsite should also be included in the response.	Submit description with application.	
10	**RADIATION SAFETY PROGRAM** **Audit Program** The applicant is not required to, and should not, submit its audit program to the NRC for review during the licensing phase.	N/A	
	Survey Instruments No survey instrument is required if proposed use involves neither the removal of sources from the device nor any maintenance and repair of a device that involves the source.	[ ]	
	OR If the applicant proposes to perform operations that involve the removal of sources from the device or maintenance and repair of a device that involves the source, we will possess or have access to a radiation survey meter that meets the requirements in the procedures for performing removal or repair of the sources.	[ ]	[ ]
	Material Receipt and Accountability 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.	[ ]	[ ]

Item No.	Title and Criteria	Yes	Description Attached
10	**RADIATION SAFETY PROGRAM** ***(Cont'd)***		
	Occupational Dosimetry		
	No personnel monitoring is required if proposed use does not involve the removal of sources from the device or any maintenance and repair of a device that involves the source.	[ ]	
	OR		
	If the applicant proposes to perform operations that involve the removal of sources from the device or maintenance and repair of a device that involves a source (other than in gaseous form, H-3 or Ni-63), we will maintain, for inspection by NRC, documentation demonstrating that unmonitored individuals are not likely to receive a radiation dose in excess of 10% of the allowable limits in 10 CFR Part 20, or "we will provide dosimetry processed and evaluated by a NVLAP-approved processor that is exchanged at a frequency recommended by the processor."	[ ]	[ ]
	Public Dose		
	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.	N/A	
	Leak Test		
	Leak tests will be performed at intervals specified in the Sealed Source and Device Registration Certificate. 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.	[ ]	[ ]

Item No.	Title and Criteria	Yes	Description Attached
10	**RADIATION SAFETY PROGRAM** ***(Cont'd)***		
	Maintenance		
	If authorization has been requested to perform the maintenance and repair operations described in Item 7, state in the application that the written procedures provided by the device manufacturer will be followed for each such operation requested.	[ ]	
	OR		
	If a procedure will be followed other than that provided by the device manufacturer, submit a proposed procedure to use for each operation	[ ]	[ ]
	Transportation		
	The applicant is not required to submit its response to transportation during the licensing process; however, this issue will be reviewed during inspection.	N/A	
	Minimization of Contamination		
	The applicant is not required to submit a response to the minimization of contamination section if the applicant's responses meet the criteria for the following sections: "Radiation Safety Program - Leak Tests," "Facilities and Equipment," and "Waste Management."	N/A	
11	**WASTE MANAGEMENT**		
	GC/XRFs Disposal & Transfer		
	The applicant is not required to submit a response to waste management during the licensing process. The licensee should, however, develop, implement, and maintain GC/XRF transfer and disposal procedures in its radiation safety program.	N/A	

TRANSMISSION VERIFICATION REPORT

TIME : 07/05/2007 11:07
NAME : USNRC RIII
FAX : 6308299782
TEL :
SER.# : 000A7J925774

DATE,TIME	07/05 11:03
FAX NO./NAME	88109845830
DURATION	00:04:20
PAGE(S)	15
RESULT	OK
MODE	STANDARD ECM

UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION III
2443 WARRENVILLE ROAD, SUITE 210
LISLE, ILLINOIS 60532-4352

TELEFAX TRANSMITTAL

DATE: July 5, 2007

NUMBER OF PAGES: 15
(Including this page)

SEND TO: Ronald Koglin - Radiation Safety Officer - OR - Sachitanand Karnakote

LOCATION: Dunn Paper, Inc.

FAX NUMBER: (810) 984-5830

☒ ***VERIFY BY CALLING SENDER***

FROM:
(SENDER) **Bill Reichhold**

TELEPHONE NUMBER **(630) 829-9839** FAX NUMBER **(630) 515-1078**

If you do not receive the comp[illegible] ease contact the sender as soon as possible at the telephone nu[illegible] above.

MESSAGE

UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION III
2443 WARRENVILLE ROAD, SUITE 210
LISLE, ILLINOIS 60532-4352

TELEFAX TRANSMITTAL

DATE: July 5, 2007 NUMBER OF PAGES: 15
(Including this page)

SEND TO: Ronald Koglin - Radiation Safety Officer - OR - Sachitanand Karnakote

LOCATION: Dunn Paper, Inc.

FAX NUMBER: (810) 984-5830 ☒ ***VERIFY BY CALLING SENDER***

FROM:
(SENDER) **Bill Reichhold**

TELEPHONE NUMBER **(630) 829-9839** FAX NUMBER **(630) 515-1078**

If you do not receive the complete fax transmittal, please contact the sender as soon as possible at the telephone number provided above.

MESSAGE

Please see accompanying documents.

NOTICE
This message is intended only for the use of the individual or entity to which it is addressed and may contain information that is privileged, confidential, or exempt from disclosure under applicable law. If the reader of this message is not the intended recipient or the employee responsible for delivering the message to the intended recipient, you are hereby notified that any dissemination, distribution or copying of this communication is strictly prohibited. If you have received this communication in error, please notify the sender immediately by telephone and return the original to the above address, by U.S. Mail. Thank you.

Thank you for your response to my facsimile dated May 2, 2007, however, we still need additional information, and clarification. Please provide the following:

Fixed Gauge Renewal Information

1. **Please specify the model number of the source holder for the Impact Systems Gauge you are using. Your license currently lists models 4400 and 4401.**

2. **Please provide a copy of the disposal records for the promethium-147 sources that were disposed of. Please include a copy of the leak test records for these sources that were current at the time the sources were disposed.**

3. **Please address the item regarding NON-ROUTINE MAINTENANCE OPERATIONS for the Impact Systems Gauge. See attached.**

Gas Chromatograph

The Shimadzu gas chromatograph may be purchased as a generally licensed device or a specifically licensed device. Before we can remove this device as a specifically licensed item, we need a letter from the manufacturer stating that your gas chromatograph meets the "generally licensed gas chromatograph requirements", (such as proper labeling, hardware, etc.). You may wish to keep the gas chromatograph on your specific license at this time until you can get the proper documentation from the manufacturer showing that your gas chromatograph is suitable to be generally licensed. In the meantime, please complete the attached application for a gas chromatograph, so that we can renew your license.

Ownership Change

1. **Please specific the date when the ownership change occurred.**

2. **Please specify if there have been any changes in the information in your letter dated October 8, 2003, describing the change of ownership/control.**

Please send a facsimile of your response to the above within 7 days and refer to control *316045*. Please call me at 630-829-9839 if you have any questions.

From the desk of:

Bill Reichhold

Bill Reichhold

Item No. and Title	Suggested Response	Yes	Alternative Procedures Attached
10. Radiation Safety Program - Maintenance	ROUTINE MAINTENANCE We will implement and maintain procedures for routine maintenance of our fixed gauges according to each manufacturer's or distributor's written recommendations and instructions.	[ ]	[ ]
NEED THIS	NON-ROUTINE MAINTENANCE OPERATIONS The gauge manufacturer, distributor or other person authorized by NRC or an Agreement State will perform non-routine operations such as installation, initial radiation survey, repair, and maintenance of components related to the radiological safety of the gauge, gauge relocation, replacement, and disposal of sealed sources, alignment, or removal of a gauge from service.	[ ]	[ ] The information listed in Appendix N supporting a request to perform non-routing operations in-house is attached
10. Radiation Safety Program - Transportation	The applicant is *not* required to submit its response to transportation during the licensing process; this issue will be reviewed during inspection. However, the licensee should develop, implement, and maintain transportation procedures according to NRC and DOT regulations.	Need Not Be Submitted with Application	
10. Radiation Safety Program - Fixed Gauges Used at Temporary Job Sites	This is not applicable to our program. We will not use fixed gauges at temporary job sites.	[ ] Not Applicable	
	OR		
	We will develop, implement, maintain and distribute procedures that meet the Criteria in the section entitled "Radiation Safety Program - Fixed Gauges Used at Temporary Job Sites" in NUREG-1556, Vol. 4, dated ~~August~~ OCTOBER 1998.	[ ]	[ ]
10. Radiation Safety Program - Minimization of Contamination	The applicant is not required to submit a response to minimization of contamination if the applicant's responses meet the criteria for the following sections: Radioactive Material - Sealed Sources and Devices, Facilities and Equipment, Radiation Safety Program - Operating and Emergency Procedures, Radiation Safety Program - Leak Testing, and Waste Management - Gauge Transfer and Disposal.	Need Not Be Submitted with Application	

Appendix D

Gas Chromatography Devices and X-ray Fluorescence Analyzer Applications

Gas Chromatography Devices and X-ray Fluorescence Analyzer Applications

This appendix is designed either to assist the applicant with obtaining a separate license for a gas chromatograph (GC) and/or an X-RAY fluorescence analyzer (XRF) or to be used as part of a license application that may contain other requested radioisotopes and proposed uses.

Regulations

Licensees are subject to all applicable provisions of the regulations in 10 CFR Parts 20, 21, 30, 71, 170 as they pertain to GC and XRFs.

Information for completing Items 1 through 4 of the application have already been provided in this NUREG.

Additional information for Item 3 is requested below.

Item 3: Address(es) Where Licensed Material Will Be Used or Possessed

Specify the street address, city, and state or other descriptive address (e.g., on Highway 10, 5 miles east of the intersection of Highway 10 and State Route 234, Anytown, State) for each facility at which licensed material will be used or stored. A Post Office Box address is not acceptable. In addition, state whether GC/XRFs will be used at temporary jobsites.

Item 5: Material to Be Possessed

1 Provide the radioisotopes(s) that will be used in each GC/XRF.

2. Provide the manufacturer and model number of the detector cell, foil source, plated source, or sealed source that will be used in each GC/XRF.

3. Specify the quantity (activity) of radioactive material that will be in each foil source, plated source, or other sealed source. Provide the number of sources of each foil source, plated source or sealed source that will be possessed, if known. If the total number for each type of source is unknown, provide an anticipated total.

Note: GCs that contain titanium tritide foils or scandium tritide foils require operating temperature control mechanisms and venting to the outside. Provide information on operating temperature controls and venting information with the application, if these kinds of foils are requested in the application. See license condition no. 15 of the sample GC at the end of this appendix.

Item 6: Purpose For Which Licensed Material Will Be Used

Specify the purpose for which each GC/XRF will be used.

Note: For use of portable GCs and/or XRFs, refer to NUREG - 1556, Vol. 1, for additional guidance about portable devices containing licensed material.

Item 7: Individual(s) Responsible For Radiation Safety Program And Their Training And Experience - Radiation Safety Officer

Provide the name of the person(s) who will be responsible for the GCs/ XRFs. That person(s) will be specifically named on the license.

If no repair or maintenance on the GC/XRFs is proposed by the applicant, then no specific training and experience in the use and handling of radioactive materials is necessary for individuals who will use the device(s) or supervise its use. No special training or experience is needed to perform leak tests using a leak-test kit or to clean detector cells used in GC devices, provided the source or foil is not removed from the detector cell.

If the applicant proposes to perform any operations that involve removal of sources containing radioactive material from the device or maintenance and repair of a device that involves the source, then they must ensure a "responsible individual" performs these operations. The responsible individual shall have received instruction and training in the principles and practices of radiation safety, the use of radiation detection instruments, and the performance of these operations. Such training may normally be accomplished in 1 or 2 days. In the application, provide the following information:

- Name of each responsible individual who will perform the operations
- Outline of the instruction and training each responsible individual has received in the principles and practices of radiation safety, the use of radiation detection instruments, and the operations that will be performed, including actual practice in performing the operations. The amount of time spent on each topic in the training should be specified.

Item 8: Training Provided to Other Users

Persons who will only use a GC or XRF under the supervision of the responsible individual named in Item 7 need no special training and their names do not need to be submitted. These supervised individuals should not be permitted to perform any maintenance or repair operations. Only responsible individuals specifically named in Item 7 shall perform such operations.

Item 9: Facilities And Equipment

10 CFR 30.33(a)(2) states that an application will be approved if the applicant's proposed equipment and facilities are adequate to protect health and to minimize danger to life or property. 10 CFR 20.1801 and 20.1802 also state that licensed material stored in an unrestricted area must be secured from unauthorized removal, and licensed materials in an unrestricted area and not in storage must be under the constant surveillance and immediate control of the licensee.

The room, laboratory, or storage area in which the device is located should be (1) accessible only to persons authorized to use the device and (2) locked when an authorized person is not physically present. The application should state that the laboratory or area will be locked or secured when an authorized person is not present. The room, laboratory, or storage area cannot be considered a restricted area if it is accessible to unauthorized persons.

Item 10: Radiation Safety Program

10.1 Audit Program

Licensees must review the content and implementation of their radiation protection programs annually, to ensure compliance with NRC regulations and with the terms and conditions of the license. Appendix J contains a suggested audit program that is acceptable to NRC. All areas indicated in Appendix J may not be applicable to every licensee and may not need to be addressed during each audit.

10.2 Radiation Detection Instruments

A survey meter for routine uses of GC/XRF is not required.

If maintenance and repair operations are proposed as described in Item 7, and the operations involve the sealed source, provide information about what surveys will be performed, what type of survey meter will be used for conducting surveys, the range of the survey instrument, and calibration information including frequency of calibration. It is not necessary to specify the manufacturer and model number of the survey meter. For more information on survey meters, see "Radiation Safety Program - Instruments," in the main body of this NUREG.

10.3 Material Receipt and Accountability

Licensees are required to maintain records of receipt, transfer, and disposal of licensed material. Loss, theft, or misplacement of licensed material can occur; therefore control and accountability of GC/XRFs must be ensured. Licensees who use and/or possess sealed sources are required by license conditions to perform inventories of sealed sources every six months (see sample license, condition no. 16). Some sealed sources may not be in use or are rarely used and are placed in

storage. In these cases, licensees should confirm that these sealed sources have not been disturbed at least every 6 months.

10.4 Personnel Monitoring Equipment

Personnel monitoring devices are not required for the following:

- Routine use and normal operation of GC/XRFs
- Maintenance and repair operations described in Item 7, if the radiation source in the GC/XRF is in a gaseous form or is nickel-63 (Ni-63).

If proposed uses of GC/XRFs include the maintenance and repair operations described in Item 7, and these operations involve sealed sources other than in gaseous form or Ni-63, an evaluation for personnel monitoring devices is required for persons performing these operations.

The application should indicate that maintenance and/or repair personnel will be provided with either film badges or thermoluminescence dosimeters (TLDs) for use while performing service operations or provide a dose evaluation which indicates that personnel will not be required to wear monitoring devices.

10.5 Leak-Testing

NRC requires testing to determine whether there is any radioactive leakage from sealed/plated foil sources. Records of surveys and leak tests results must be maintained.

When issued, a license will require performance of leak tests of sealed/plated foil sources at intervals as approved by NRC or an Agreement State and specified by the SSD Registration Certificate. The measurement of the leak-test sample is a quantitative analysis requiring that instrumentation used to analyze the sample be capable of detecting 185 Bq (0.005 μCi) of radioactivity.

Manufacturers, consultants, and other organizations may be authorized by NRC or an Agreement State either to perform the entire leak test sequence for other licensees or to provide leak test kits to licensees. In the latter case, the licensee is expected to take the leak test sample according to the sealed source or plated foil manufacturer's (distributor's) and the kit supplier's instructions and return it to the kit supplier for evaluation and reporting results. Leak test samples should be collected at the most accessible area where contamination would accumulate if the sealed source were leaking. Licensees may also be authorized to conduct the entire leak test sequence themselves. For more information about leak testing sealed/plated foil sources, see "Radiation Safety Program - Surveys," in the main body of this NUREG.

10.6 Maintenance and Repair

If authorization has been requested to perform maintenance and repair operations as stated in Item 7, then state in the application that the written procedures provided by the device manufacturer will be followed for each such operation requested. If a procedure will be followed other than that provided by the device manufacturer, submit a proposed procedure to use for each operation requested.

10.7 Transportation

If authorization has been requested in the application to use GC/XRFs at a temporary jobsite, the applicant must take into consideration DOT regulations, particularly blocking and bracing the device containing licensed material. The applicant is not required to submit transportation information with the application.

10.8 Minimization of contamination

New license applicants are required by 10 CFR 20.1406 to describe how facility design and procedures for operation will minimize, to the extent practicable, contamination of the facility and the environment, facilitate eventual decommissioning, and minimize, to the extent practicable, the generation of radioactive waste.

Item 11: Waste Management

Because of the nature of the licensed material contained in GC/XRF devices, the usual disposal option is to transfer the licensed material to an authorized recipient. State in the application that disposal will be by transfer of the radioactive material to a licensee specifically authorized to possess it, or provide information for an alternate method of disposal for NRC review.

Authorized recipients are the original supplier of the device, a commercial firm licensed by NRC or an Agreement State to accept radioactive waste from other persons, or another specific licensee authorized to possess the licensed material. No one else is authorized to receive licensed material.

Suggested Format for Providing Information Requested in Items 1 through 4 of NRC Form 313

D.1 ITEM 1: ACTION TYPE

ACTION TYPE:	**ADMINISTRATIVE REVIEW:**
[ ] New [ ] Amendment [ ] Renewal	[ ] Current Guidance Used [ ] References in Application Based On Current Regulations [ ] All Attachments Referenced Included [ ] Signature on Application

D.2 ITEM 2: LEGAL IDENTITY

NAME:	

D.3 ITEMS 2 & 3: ADDRESS

STORAGE & LOCATION OF USE ADDRESS:	**MAILING ADDRESS:**
Temporary Job Sites [ ] YES [ ] NO	

D.4 ITEM 4: PERSON TO BE CONTACTED ABOUT THIS APPLICATION

CONTACT PERSON:	
TELEPHONE NUMBER:	

Suggested Format for Providing Information Requested in Items 5 through 11 of NRC Form 313.

D.5 ITEMS 5 & 6: MATERIALS TO BE POSSESSED AND PROPOSED USES

Yes	No	Radioisotope	Mfg/model No.	Quantity	Purpose of Use	Specify Other Uses Not Listed on SSD Certificate
		Hydrogen-3[1]	Sealed sources in a compatible device as specified in Sealed Source and Device Registration Sheet	Not to exceed maximum activity per source as specified in Sealed Source and Device Registration Sheet	Measure Physical Properties of Materials	[ ] Not applicable ___ [ ] Uses are:
		Nickel-63	Sealed sources in compatible device as specified in Sealed Source and Device Registration Sheet	Not to exceed maximum activity per source as specified in Sealed Source and Device Registration Sheet	Measure Physical Properties of Materials	[ ] Not applicable ___ [ ] Uses are:
		Americium-241	Sealed sources in compatible device as specified in Sealed Source and Device Registration Sheet	Not to exceed maximum activity per source as specified in Sealed Source and Device Registration Sheet	Measure Physical Properties of Materials	[ ] Not applicable ___ [ ] Uses are:

Yes	No	Radioisotope	Mfg/model No.	Quantity	Purpose of Use	Specify Other Uses Not Listed on SSD Certificate
		Other (specify)				

[1] If titanium tritide foils or scandium tritide foils are requested, provide operating temperature control and venting information. (See "Note" in Item 5 of this appendix.)

D.6 ITEMS 7 THROUGH 11: TRAINING AND EXPERIENCE, FACILITIES AND EQUIPMENT, RADIATION SAFETY PROGRAM, AND WASTE DISPOSAL

Item No.	Title and Criteria	Yes	Description Attached
7	**INDIVIDUAL(S) RESPONSIBLE FOR RADIATION SAFETY PROGRAM AND THEIR TRAINING EXPERIENCE** **RSO** Name: _____		
	Before obtaining licensed materials, the proposed RSO will have successfully completed the training described in Appendix D, in NUREG - 1556, Vol. 7.	[ ]	[ ]
	AND		
	Before being named as the RSO, future RSOs will have successfully completed the training described in Appendix D, in NUREG - 1556, Vol. 7.	[ ]	
8	**TRAINING FOR INDIVIDUALS WORKING IN OR FREQUENTING RESTRICTED AREAS** Individuals working under the supervision of a responsible person named in item 7, above, are not required to have any specific radiation safety training prior to using a GC/XRF.	N/A	

Item No.	Title and Criteria	Yes	Description Attached
9	**FACILITIES AND EQUIPMENT** Describe the facilities where GC/XRFs will be used and stored. Additional information regarding the use and storage of GC/XRFs at a temporary jobsite should also be included in the response.	Submit description with application.	
10	**RADIATION SAFETY PROGRAM** **Audit Program** The applicant is not required to, and should not, submit its audit program to the NRC for review during the licensing phase.	N/A	
	Survey Instruments No survey instrument is required if proposed use involves neither the removal of sources from the device nor any maintenance and repair of a device that involves the source.	[ ]	
	OR If the applicant proposes to perform operations that involve the removal of sources from the device or maintenance and repair of a device that involves the source, we will possess or have access to a radiation survey meter that meets the requirements in the procedures for performing removal or repair of the sources.	[ ]	[ ]
	Material Receipt and Accountability 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.	[ ]	[ ]

Item No.	Title and Criteria	Yes	Description Attached
10	**RADIATION SAFETY PROGRAM** ***(Cont'd)***		
	Occupational Dosimetry		
	No personnel monitoring is required if proposed use does not involve the removal of sources from the device or any maintenance and repair of a device that involves the source.	[ ]	
	OR		
	If the applicant proposes to perform operations that involve the removal of sources from the device or maintenance and repair of a device that involves a source (other than in gaseous form, H-3 or Ni-63), we will maintain, for inspection by NRC, documentation demonstrating that unmonitored individuals are not likely to receive a radiation dose in excess of 10% of the allowable limits in 10 CFR Part 20, or "we will provide dosimetry processed and evaluated by a NVLAP-approved processor that is exchanged at a frequency recommended by the processor."	[ ]	[ ]
	Public Dose		
	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.	N/A	
	Leak Test		
	Leak tests will be performed at intervals specified in the Sealed Source and Device Registration Certificate. 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.	[ ]	[ ]

Item No.	Title and Criteria	Yes	Description Attached
10	**RADIATION SAFETY PROGRAM** ***(Cont'd)***		
	Maintenance		
	If authorization has been requested to perform the maintenance and repair operations described in Item 7, state in the application that the written procedures provided by the device manufacturer will be followed for each such operation requested.	[ ]	
	OR		
	If a procedure will be followed other than that provided by the device manufacturer, submit a proposed procedure to use for each operation	[ ]	[ ]
	Transportation		
	The applicant is not required to submit its response to transportation during the licensing process; however, this issue will be reviewed during inspection.	N/A	
	Minimization of Contamination		
	The applicant is not required to submit a response to the minimization of contamination section if the applicant's responses meet the criteria for the following sections: "Radiation Safety Program - Leak Tests," "Facilities and Equipment," and "Waste Management."	N/A	
11	**WASTE MANAGEMENT**		
	GC/XRFs Disposal & Transfer		
	The applicant is not required to submit a response to waste management during the licensing process. The licensee should, however, develop, implement, and maintain GC/XRF transfer and disposal procedures in its radiation safety program.	N/A	