U.S. ATOMIC ENERGY COMMISSION
REGULATORY OPERATIONS, REGION I
Inspection Field Notes

Rev. 11/15/72

A. Docket Number	B. Report Number	C. Priority/ Category	D. Inspection Dates
70-1255	7301	K-V	AUG 30-31, 1973

E. Licensee	F. Facility	G. License No.
GENERAL ELECTRIC Co PHILA PA	VALLEY FORGE SPACE CTR	SNM 1199

H. Type of Inspection	I. No. and date of last Amendment	J. Dates of Last Inspection
INITIAL	#2 9/15/71	N/A

K. Principal Inspector and Date of Report	L. Accompanying Inspector	M. Other Accompanying Personnel
W.D. ALLEN	NONE	NONE

N. Proprietary Info.	O. Reviewer	P. Date of Review
NONE	R.O. McClintock	9/6/73

Q. Individuals Interviewed* and Titles
a. R. OSTERLING RSO
b. T.P. HANDLEY, CHEMN IRAG
c.
d.
e.
f.
g.
h.

R. Date of Interview: AUG 31, 1973

S. Place of Interview: B'o OFFICE

T. Enforcement Action
1. L/C 7 - Excessive amount Pu 238 SEE A-8
2. L/C 10A - IMPROPER LEAK TEST FREQUENCY SEE A-8
3. 20.206(b) - PART 20 90.D SEE A-5

U. Previous Outstanding Items: N/A

V. Unresolved Items: NONE

W. Previously Reported Unresolved Items: N/A

X. Recom. Reinspection	Y. Name & Tele. # of RSO	Z. RMS Code Number
—	A-	

ZZ. Scope of Inspection: ( ) complete, ( ) partial, ( ) special _____

*Identify individuals who attended Management Interview by asterisks.

B37

DETAILS

Scope of the Program

-Number of individuals occupationally exposed 3 .

-Number of individuals subject to significant* risk 0 .

-Potential for external exposure

	Negligible	Slight	Moderate	High
Whole body	✓			
Skin	✓			
Extremities	✓			

-Potential for internal exposure NON ( ) negligible ( ) slight ( ) moderate ( ) high

-Effluents

	Negligible	Slight	Moderate	High
Airborne	None			
Liquids				

-Unusual aspects

General

All records examined and all inquiries made by the inspector related to records and events made or experienced in the time interval from the date of the last inspection, or the date of license issuance in the case of initial inspections, until the date of this inspection, unless otherwise noted.

Unless otherwise specified, radiation level measurements, shown in these notes as having been made by the inspector, were made using a radiation survey meter type BERLINE, model 120 , calibrated 6/73 by BNL .

The findings reported here were based on: (1) observations made by the inspector during his physical inspection of the licensee's facilities (2) a selective examination of procedures and representative records and documents, (3) Information furnished by Individuals Interviewed and (4) Measurements made by the inspector.

*Reasonable probability of incurring 25% or more of MPC or MPE.

Items of Noncompliance and Safety Found in the Last Inspection

The licensee's action to correct and prevent recurrence of items of noncompliance and/or safety, found in the last inspection, were given particular attention during this inspection. Unless these items are shown under the section below, entitled "Findings Indicating Noncompliance or Conditions Prejudicial to Health and Safety", the inspector found that the licensee's corrective and preventive action was adequate.

Findings Indicating Compliance

Annex A identifies the specific procedures followed by the inspector in determining compliance with each relevant section of Title 10. The inspector also made such inquiries, examined such records and made such observations as were necessary for him to determine that the licensee had complied with the requirements of each license condition.

When a section of Annex A is notated "N/I", this means that compliance with this section was not determined during this inspection. During the next inspection this area will be covered.

When a section of Annex A is notated "N/A", this means that it is readily apparent that the section is not applicable to the licensee's program (e.g. the requirements of 10 CFR 20.103 or 106 are not applicable if the licensee possesses only sealed sources).

The paragraphs in Annex A that are initialed by the inspector indicate how the inspector determined compliance.

Status of Previously Reported Unresolved Items

N/A

Additional Information Relating to Incidents Reported Since Last Inspection

Attached as Annex B, or referenced on identified pages of these notes.

Findings Indicating Noncompliance or Conditions Prejudicial to Health and Safety

Attached as Annex C, or referenced on identified pages of these notes.

Principals

Persons	Radionuclides	Locations of Use	Rate of Use
A	Th 232, 59 U 235	Storage	Assigned to work as needed

Line of Authority (from user to Management)

USER → RSO → Committee CHRM → ADMIN

Facilities

Use: ( ) Radiochemistry labs used exclusively for licensed material; ( ) Conventional labs used exclusively for licensed material; (✓) Conventional labs with shared use; (✓) Room or area used exclusively for preparation and application of licensed material, and storage; ( ) Mfg or processing areas designated for radiologic operations only; ( ) Entire building used exclusively for radiologic operations ( ) Other:

Storage:

(✓) Ample space, (✓) Adequate lighting, (✓) Uncluttered, (✓) Shielding adequate
(✓) Material identified
( ) Refrigerator, ( ) cabinet, ( ) fume hood, (✓) cave, (✓) separate room, ( ) separate building

Access Control:

(✓) locked, (✓) posted and administratively controlled
(✓) locked when unattended, ( ) custodial personnel instructed

Control Devices and Alarms: None ( ) 20.203(c)(2), ( ) Other

Comments:

Equipment

Monitoring, portable: (✓) alpha, (✓) beta, (✓) gamma, (✓) neutron
(✓) adequate no., (✓) accessible, (✓) calibrated, (✓) appropriate sensitivity

Monitoring, area: None ( ) alpha, ( ) beta, ( ) gamma, ( ) air sampling, ( ) adequate no.
( ) properly located, ( ) calibrated, ( ) tested, ( ) appropriate sensitivity.

Special Equipment:

( ) BZ samplers: ( ) adequate no., ( ) properly used, ( ) accessible ( ) fume hoods, ( ) glove boxes, ( ) hot cells-large, ( ) hot cells-small ( ) local exhaust ventilation, (✓) remote tongs, (✓) shields, (✓) protective handwear, (✓) protective footwear, (✓) protective clothing, ( ) absorbent paper, ( ) working trays, ( ) designated radioactive waste disposal sinks, ( ) respirators, ( ) eye wash fountains, ( ) DOP filter testing equipment, ( ) disposable pipettes, ( ) disposable syringes, ( ) Other:

Management Interview

The inspector(s) met with _____, _____ and _____ in _____'s office, on _____, at the conclusion of the inspection. The inspector(s) gave
date
_____a Form AEC-591 indicating (that no items of) noncompliance had been found during the inspection.

- - - - - - - - - - - - - - - - -

The inspector(s) met with _____, _____, and _____ in _____'s office, on _____, at the conclusion of the inspection. The inspector(s) informed
date
_____ that no items of noncompliance had been found during this inspection. He informed _____ that he would receive a letter enclosing a Form AEC-591 confirming these findings. (Inspector: No Form AEC-591 may be issued if there were Outstanding Items reviewed during this inspection except, if our acknowledgement letter, written following the issuance of an AEC Form 592, predated July 1, 1971.)

No form AEC-591 was issued because Outstanding Items had been reviewed during this inspection.

- - - - - - - - - - - - - - - - -

The inspector(s) met with _____, _____, and _____ in _____'s office, on _____, at the conclusion of the inspection. The inspector(s) explained the purpose of the inspection. With respect to the item(s) of noncompliance, the inspector(s) explained the relevant requirements of the AEC regulations and described the inspection findings that indicated noncompliance with these requirements. _____ acknowledged the validity of the citation(s) and stated that prompt action would be taken to correct them. He also described procedures whereby he would assure that these and similar item(s) of noncompliance would not recur. He signed and dated the Form AEC-591.

- - - - - - - - - - - - - - - - -

The inspector(s) met with _____, A and B in B's office, on 8/31/73, at the conclusion of the inspection. The inspector(s) ex-
date

plained the purpose of the inspection. With respect to the items of noncompliance, the inspector(s) explained the relevant requirements of the AEC regulations and/or the conditions of the license and described the inspection findings that indicated noncompliance with these requirements. B acknowledged the validity of the citations and stated that prompt action would be taken to correct them. He also described procedures whereby he would assure that these and similar items of noncompliance would not recur.

- - - - - - - - - - - - - - - - -

Other:

ANNEX A

1.0 10 CFR 20

1.1 20.101, "EXPOSURE OF INDIVIDUAL TO RADIATION IN RESTRICTED AREAS"

1.1.1 By examination of records of ( ) receipts, (✓) inventories, (✓) surveys, ( ) personnel dosimetry, ( ) bioassay, and ( ) disposal transfers, and/or (✓) by questioning the RSO and/or ( ) these users _____ _____ _____, (✓) and by my physical inspection of the restricted areas, I IDENTIFIED those INDIVIDUALS WHOSE external EXPOSURES MIGHT reasonably be expected to EXCEED 25% OF THE LIMITS of 20.101(a). WDa

1.1.1.1 I asked the RSO and/or the principal users HOW the EXPOSURES to these individuals had been EVALUATED and what magnitudes of exposure had been found. WDa

1.1.2 I found that the licensee's METHODS of evaluating exposures was in each case APPROPRIATE to the type and energy of the radiation and the area of the individuals body that was at risk. WDa

1.1.3 I found that the licensee's evaluations of exposures showed that NO INDIVIDUAL had been EXPOSED IN EXCESS of the limits of 20.101. WDa

1.1.4 A stated that the licensee did not avail himself of the provisions of 10 CFR 20.101(b) and therefore NO FORMS AEC-4 WERE MAINTAINED. WDa

1.1.5 ( ) I observed a CORRECTLY COMPLETED FORM AEC-4 for each individual whose quarterly whole body exposure exceeded 1.25 rems; or

( ) I identified approximately ____% of the individuals whose quarterly whole body exposure had exceeded 1.25 rems and examined each individual's Form AEC-4 and found each to be correctly completed.

1.2 20.103, "EXPOSURE OF INDIVIDUALS TO CONCENTRATIONS OF RADIOACTIVE MATERIAL IN RESTRICTED AREAS"

1.2.1 By examination of records of ( ) receipts, ( ) inventories, ( ) surveys, ( ) personnel dosimetry, ( ) effluent monitoring, and ( ) disposals/transfers, by questioning the RSO and these users _____ _____ _____, and by my physical inspection of the restricted areas, I IDENTIFIED those INDIVIDUALS WHOSE internal EXPOSURES MIGHT reasonably be expected to EXCEED 25% OF THE LIMITS of 20.103. N/A

1.2.1.1 I asked the RSO and/or the principal users HOW the EXPOSURES to these individuals had been EVALUATED and what magnitude of exposure had been found.

1.2.2 I found that the licensee's METHODS of evaluating compliance with 20.103 was APPROPRIATE to the circumstances of exposure in each case. N/A

1.2.3 I found that the licensee's evaluations of exposures showed that in NO instance had an INDIVIDUAL been EXPOSED IN EXCESS of the limits of 20.103.

1.3 20.104, "EXPOSURE OF MINORS"

1.3.1 I determined by questioning (✓) the RSO, and/or ( ) _____, and/or (✓) examining Forms AEC-5 or their equivalents and/or (✓) observing individuals in the restricted areas that NO INDIVIDUALS under 18 years of age had been EXPOSED in the restricted areas, or WBB

1.3.2 In the manner indicated above, I IDENTIFIED those INDIVIDUALS under 18 years of age who had been exposed in the restricted areas by questioning ( ) the RSO, ( ) the minors, ( ) the minor's supervisors. I determined the circumstances of exposure and the licensee's method of evaluating the minor's exposures. I determined that the METHOD OF EVALUATION had been ADEQUATE. I found that the evaluations showed that the exposures had NOT EXCEEDED 10% of the limits of 10 CFR 20.101(a).

1.4 20.105, "PERMISSIBLE LEVELS OF RADIATION IN UNRESTRICTED AREAS"

1.4.1 By questioning the RSO and/or the principal users, and (✓) by examining records of ( ) receipts, (✓) inventories, (✓) disposals/transfers, and (✓) surveys, and by a physical inspection of the restricted areas, I DETERMINED the TIMES AND CIRCUMSTANCES under WHICH the licensee's use and/or storage of materials would have resulted in the generation of exposure levels in the unrestricted area of a magnitude of WARRANTED CALCULATION OR MEASUREMENT to assure compliance with 20.105. WBB

1.4.2 I questioned the RSO and/or the involved principal users to determine if these calculations or MEASUREMENTS had been MADE; HOW they had been MADE; and what CONCLUSIONS had been DRAWN. I found that adequate surveys had been made indicating that the levels of radiation in the unrestricted area had not exceeded the limits of 20.105.

1.4.3 I MEASURED THE EXPOSURE RATES IN THE UNRESTRICTED AREAS and found that at the time of inspection none exceeded the allowed levels.

1.4.4 Following the procedures described in paragraph 1.4.1 above, I determined that there had been NO circumstances under which there was any REASONABLE PROBABILITY OF the levels HAVING EXCEEDED the limits of 20.105. WDA

1.5 20.106, "CONCENTRATION IN EFFLUENTS TO UNRESTRICTED AREAS"

1.5.1 By questioning the RSO and these principal users _____ _____ _____, by examination of records of ( ) receipts, ( ) inventories, ( ) effluent monitoring, and ( ) surveys, ( ) and by observations made during my physical inspection of the restricted areas, I IDENTIFIED those OPERATIONS WHERE there was a REASONABLE PROBABILITY of generation OF CONCENTRATIONS of radioactive material in effluents to the unrestricted area. N/A

1.5.2 I asked the RSO or the principal user to describe the evaluation that had been made to ASSURE that the CONCENTRATION of radioactive material in these effluents DID NOT EXCEED THE LIMITS of 20.106.

1.5.3 I determined that the licensee's ( ) calculations, ( ) location of samplers, ( ) collection methods, and ( ) assay methods were SUITABLE for EVALUATION of the concentrations of the types of radioactive material that were discharged (i.e. considering its identity, physical and chemical form, particle size, the presence of dust loading or moisture . . . etc). I noted that the licensee's evaluations showed compliance with 20.106.

1.5.4 Having assured myself, from the findings of previous AEC inspectors, that the licensee's procedures for calculating, sampling and assaying the samples were in accord with accepted practices I ONLY EXAMINED the RECORDS of his measured concentrations. I found that these showed him to be in compliance with 20.106.

1.5.5 Following the procedures described in paragraph 1.5.1 above, I determined that quantities and forms of the material, and the circumstances under which it was handled were such that THERE WAS NO SIGNIFICANT PROBABILITY OF VIOLATION OF THE SECTION.

1.6 20.201, "SURVEYS"

1.6.1 In the course of determining the licensee's status of compliance with all sections of Part 20, I found that ADEQUATE SURVEYS had been CONDUCTED. WDA

1.7 20.202, "PERSONNEL MONITORING"

1.7.1 As stated in paragraph 1.1.1 above, I identified those individuals whose external exposure might reasonably be expected to exceed 25% of the 20.101(a) limits. I ascertained that a FORM AEC-5 or its equivalent was maintained FOR EACH of these INDIVIDUALS. WDR

1.7.1.1 I concurred in the licensee's evaluation that personnel monitoring was not required for any individual using material under this license.

1.7.1.2 A stated that each of these individuals had been INSTRUCTED TO WEAR his personnel DOSIMETER while he was in the restricted areas. WDR

1.7.1.3 I noted that the licensee's written OPERATING PROCEDURES directed occupants of the restricted areas to wear their personnel dosimeters. WDR

1.7.1.4 During my inspection of the restricted areas I OBSERVED that all individuals who I encountered, and who were required to wear PERSONNEL DOSIMETERS, were wearing them. WDR

1.7.2 _____ identified those individuals under 18 YEARS OF AGE who entered the restricted areas. He DESCRIBED the PROCEDURES followed by each of these individuals and the duration of times spent in the restricted areas. I noted that for each individual whose exposures could reasonably be expected to EXCEED 5% of the LIMITS of 20.101(a) there was on file a Form AEC-5 or its equivalent.

1.7.3 A stated that NO individuals UNDER 18 YEARS OF AGE entered the restricted areas. WDR

1.7.4 By questioning the following individuals ____, ____, and ____ who were responsible for controlling access to High Radiation Areas or who entered these areas, I determined that all INDIVIDUALS WHO ENTERED the HIGH RADIATION AREAS were PROVIDED with PERSONNEL MONITORING equipment.

1.7.5 A stated, and my findings verified the fact, that there were NO HIGH RADIATION AREAS under the licensee's control. WDR

1.8 20.203, "CAUTION SIGNS, LABELS, SIGNALS, AND CONTROLS"

1.8.1 In my physical inspection of the operational areas I observed that EACH ROOM OR AREA I visited was POSTED with the appropriate sign reading (✓ CRM, (✓ CRA, ( ) CHRA, or ( ) CARA, as applicable, and showing the radiation caution symbol. WDA

1.8.2 In my physical inspection of the operational area I observed that EACH CONTAINER that required a label was in fact LABELED CRM, showing the radiation caution symbol, the identity of its contents and sufficient information to permit individuals handling or using the containers, or working in the vicinity thereof, to take precautions to avoid or minimize exposures. WDA

1.9 20.206, "INSTRUCTION OF PERSONNEL; POSTING OF NOTICES TO EMPLOYEES"

1.9.1 A stated that all INDIVIDUALS working in or frequenting the restricted areas were ORALLY INSTRUCTED to a degree commensurate with the radiation hazards encountered. WDA

1.9.2 I examined the licensee's OPERATING PROCEDURES and found that they PROVIDED individuals working in or frequenting the restricted areas with INSTRUCTIONS for the safe handling of material that were commensurate with the radiation hazards encountered. WDA

1.9.3 I observed that the licensee had POSTED a current COPY of 10 CFR 20 a copy of the LICENSE and a copy of OPERATING PROCEDURES applicable to work under the license in a sufficient number of places to permit occupants of the restricted areas to observe them on the way to or from their place of employment. Only copy available was outdated last 5 changes were missing N/C

1.9.3.1 _____ stated that these DOCUMENTS were AVAILABLE for employee's examination upon request. I saw these documents.

1.9.4 I observed that FORMS AEC-3 were conspicuously POSTED in a sufficient number of places to permit employees working in or frequenting any portion of the restricted areas to observe a copy on the way to or from their place of employment. WDA

1.10 20.207, "STORAGE OF LICENSED MATERIALS"

1.10.1 In my inspection of the licensee's facilities, I observed that NO MATERIAL was STORED IN an UNRESTRICTED AREA. WDA

1.10.1.1 _____ stated that all areas in which MATERIAL was stored were SECURED WHEN UNATTENDED by individuals who had been instructed in the safe use of the material.

1.10.2 I ASCERTAINED by physical inspection that all MATERIAL stored in unrestricted areas was SECURED against unauthorized removal from the place of storage.

1.11 20.301, "WASTE DISPOSAL - GENERAL REQUIREMENTS"

1.11.1 By questioning the RSO and these principal users _____ _____ _____, by examination of records of ( ) receipts, ( ) surveys, ( ) effluent monitoring, ( ) inventories, ( ) disposal/transfer, and by my physical inspection of the licensee facilities, I IDENTIFIED the PROCEDURES used by the licensee to dispose of waste material.

1.11.1.1 I determined that no material had been disposed of as waste. WDR

1.11.2 I determined that these procedures INVOLVED either one or a combination of the FOLLOWING METHODS: ( ) Transfer to an authorized recipient, ( ) In accordance with a license condition, ( ) Release into sanitary sewage system, ( ) Burial in soil, or ( ) As allowed by 20.106.

1.12 20.303, "DISPOSAL BY RELEASE INTO SANITARY SEWAGE SYSTEMS"

1.12.1 A stated that no licensed material had been released into the sanitary sewage system. WDR

1.12.2 In the manner indicated in Paragraph 1.11.1, I IDENTIFIED those OPERATIONS from which waste was discharged to the sanitary sewage system.

1.12.3 By questioning the RSO and these principal users _____ _____ _____ regarding the details of the procedures being followed, I determined that the effluent was READILY SOLUBLE or DISPOSABLE in water.

1.12.4 By questioning the RSO and these principal users _____ _____ _____, and by my examination of records of ( ) receipts, ( ) disposals/transfers, ( ) survey of sewage release rates, ( ) calculations of concentrations of material per unit volume of sewage, or ( ) measurements of concentration of material per unit volume of sewage, I determined that:

1. The QUANTITY of radioactive material RELEASED in any one DAY did not exceed the larger of the following limits: (a) Appendix B, Table I, Col. 2 concentrations averaged over any one day or (b) Ten times the quantity of such material specified in Appendix C.

2. The MONTHLY average did not exceed Appendix B, Table I, Col. 2 CONCENTRATIONS.

3. The GROSS quantity of radioactive MATERIAL did not exceed 1 curie/year.

1.13 20.304, "DISPOSAL BY BURIAL IN SOIL"

1.13.1 By questioning the RSO and these principal users _____ and by examination of records of burials I DETERMINED that the LICENSEE had MET the requirements of this section.

1.13.2 A stated that no licensed material was disposed of by burial in soil. WM

1.13 20.305, "TREATMENT OR DISPOSAL BY INCINERATION"

1.13.1 Having noted that incineration was AUTHORIZED BY THE LICENSE, I questioned the RSO and these principal users who utilized this method of disposal, I EXAMINED the RECORDS, which showed the identity of the material, its quantity, and the date of incineration. I also determined that the QUANTITY LIMITATIONS (if any) given in the license had NOT been EXEEDED. I determined that the licensee had made valid surveys to ensure that the EFFLUENT AND ASH limits given in the license had not been exceeded. I did this by examining his sample collection techniques and his assay procedures.

1.13.2 By examination of waste disposal records, by questioning the principal users and the RSO, and by physical inspection of the licensee's facilities, I determined that he had NOT UTILIZED INCINERATION as a means of treatment or disposal of material. WM

1.14 20.401 "RECORDS OF SURVEYS, RADIATION MONITORING, AND DISPOSAL"

1.14.1 I examined ( ) all, (✓) approximately 50 % of, the RECORDS OF RADIATION EXPOSURE of all individuals for whom monitoring was required under 20.202. I found that these records were maintained on FORMS AEC-5 or on clear and legible forms containing all the information required by Form AEC-5. I found they were kept in accordance with the INSTRUCTIONS contained ON THE REVERSE SIDE of Form AEC-5. WM

1.14.2 As indicated in paragraph 1.7.1.1 of these notes no individuals were required to wear personnel monitoring equipment.

Ref 2.1.1 -

L/C 7 limits possession of Pu^{238} to 2.5 mg as sealed sources. Inventory records indicate possession of 3 30mci and 1 5mci Pu^{238} sealed sources

$$SpA = \frac{3.558 \times 10^5}{(87.4)(238)} = \frac{3.58 \times 10^5}{2.07 \times 10^4} = 1.72 \times 10^1 \frac{Ci}{gm}$$

$$\frac{9 \times 10^{-2}\ Ci}{1.72 \times 10^1\ \frac{Ci}{gm}} = 5.2 \times 10^{-3}\ gm = 5.2\ mg$$

Receipts OK.

2.1.1

L/C 10 A requires sealed sources not in storage to be leak tested every 3 months. Records indicate the 3 30mci sources mentioned above were leak tested on 10/23/72. These sources were not returned until 5/29/73. RSO had to assume they were in use during that period as 5/29/73 was the date of return from an assigned user.

1.18.2 In the course of my inspection of all sections of Part 20, I found that in each instance where a 20.405 REPORT had been required the report HAD BEEN SUBMITTED in accordance with the specifications of the section.

1.19 20.406, "NOTICE TO EMPLOYEES OF EXPOSURE TO RADIATION"

1.19.1 A stated that NO EMPLOYEE had REQUESTED an annual REPORT of his exposure. WPR

1.19.2 _____ stated that each employee who had requested an annual REPORT of his exposure HAD BEEN FURNISHED with such report.

1.20 20.407, "PERSONNEL EXPOSURE AND MONITORING REPORTS"

1.20.1 By comparing the licensee's program with the specifications of this section I determined that the provisions of THIS SECTION DID NOT APPLY to the licensee. WPR

1.20.2 I compared the licensee's copies of REPORTS with the specifications of this section and determined that they MET THE REQUIREMENTS.

1.21 20.408, "REPORTS OF PERSONNEL EXPOSURE ON TERMINATION OF EMPLOYMENT OR WORK"

1.21.1 As indicated above, I determined that the requirements of 20.407, and hence 20.408, were NOT APPLICABLE to this licensee. WPR

1.21.2 By questioning _____ and by examining all records that gave evidence of the presence or absence of individuals who were using licensed materials (e.g. Forms AEC-5, B.Z sampling, bioassay isotope committee authorizations, etc.) I IDENTIFIED those INDIVIDUALS who had TERMINATED employment or work. I examined the licensee's copies of reports of their exposures which he had submitted to the individuals and to the AEC. I found that they had been completed in accordance with the requirements of this section.

2.1 30.3, 40.3 and 70.3 "ACTIVITIES REQUIRING LICENSE"

2.1.1 By questioning (✓) the RSO and/or (✓) the following individuals, _____, and/or ( ) by examination of records of ( ) receipts and ( ) transfer/disposal, I determined that the licensee had neither manufactured, produced, transferred, received, acquired, owned, possessed, used imported or exported licensed material except as authorized in a specific or general license issued pursuant to the regulations of Title 10. N/C with L/C 7 See A-8 N/C with L/C 10A See A-8

2.2 30.51, 40.61 and 70.51, "RECORDS"

2.2.1 I inspected the licensee's records of receipt, transfer, export and disposal and found them to be complete; indicating the identities of the materials and the dates of change of status.

3 Pu 238 @ 30 millicuries called curie

1 " " @ 5 microcuries → 5.3 mg

Pu 239 @ 8.25×10^{-4} curie

@ 2.84×10^{-3} curie

@ 3.1×10^{-2} curie

@ 3.36×10^{-1} curie

@ 5 curie ✓

@ 5 curie ✓

1 U^{235} 1 curie ✓

3 30 curie Pu^{238} last listed 29 MAY 73