



The Chemical Company

Fax Cover Sheet

To: LOREN HUETER From: DEREK HETES  
 Fax: \_\_\_\_\_ Fax: (734) 324-<sup>6775</sup>~~6401~~  
 Phone: 734 324 5282 Phone: (734) 324-  
 Date: 4/22/08  
 Pages: 18 (Including Cover Sheet)  
 Subject: LICENSE AMENDMENT INFO  
 CC: \_\_\_\_\_

Comments: HERE IS LABEL FROM HP 2643A ECD. CLEARLY IT IS GENERALLY LICENSE. INCLUDED IS THE SSDR INFO FROM AGILENT. IT APPLIES TO ALL THREE MODELS WE HAVE IN OUR POSSESSION. WE HAVE A 1223A, (2) 2397As. DON'T KNOW WHY THEY SENT ME THAT OTHER SSDR. FINALLY DEVICE INFO FOR TEXAS NUCLEAR GAUGE DISPOSAL INCLUDED AS WELL PLEASE CALL IF YOU HAVE QUESTIONS.

**CAUTION**  
 RADIOACTIVE MATERIAL  
 15 MILLICURIES OF NICKEL 63  
 G.1223A ELECTRON CAPTURE DETECTOR

SERIAL NO.	DATE
F6148	6 93

HEWLETT • PACKARD

SEE THE 5890 G.C. MANUALS BEFORE OPERATING OR SERVICING THIS DEVICE.

THIS DEVICE MUST BE WIPE (RADIOACTIVE LEAK) TESTED AT INTERVALS NOT GREATER THAN SIX MONTHS.

THE RECEIPT, POSSESSION, USE AND TRANSFER OF THIS DEVICE ARE SUBJECT TO A GENERAL LICENSE OR THE EQUIVALENT, AND THE REGULATIONS OF THE U.S. NRC OR OF A STATE WITH WHICH THE NRC HAS ENTERED INTO AN AGREEMENT FOR THE EXERCISE OF REGULATORY AUTHORITY. OUTSIDE U.S., CONSULT THE APPROPRIATE AGENCIES TO DETERMINE THE EQUIVALENT REGULATIONS.

THE LABEL SHALL BE MAINTAINED ON THIS DEVICE IN A LEGIBLE CONDITION. REMOVAL OF THIS LABEL IS PROHIBITED.

MADE IN USA

REGISTRY OF RADIOACTIVE SEALED SOURCES AND DEVICES  
SAFETY EVALUATION OF DEVICE  
(AMENDED IN ITS ENTIRETY)  
(CORRECTED PAGE 1 - OCTOBER 4, 2005)

NO.: NR-0348-D-111-B      DATE: April 1, 2004      PAGE 1 OF 9

DEVICE TYPE: Electron Capture Detector

MODELS: G1223A, G1533A, G2310A, G2330A, G2397A, G2398A, G2404A,  
and G2405A (Generally Licensed)

G1224A, G1536A (Specifically Licensed)

MANUFACTURER/DISTRIBUTOR:      Agilent Technologies, Inc.  
Little Falls Site  
(previously Hewlett-Packard,  
Little Falls Site)  
2850 Centerville Road  
Wilmington, DE 19808

SEALED SOURCE MODEL DESIGNATION: AEA Technology (formerly  
Amersham Corporation)  
Model NBCD  
Isotope Products Laboratories  
(formerly DuPont Merck  
Pharmaceutical) Model NER-004P

ISOTOPE:

Nickel-63

MAXIMUM ACTIVITY:

15 millicuries (0.56 GBq)  
(G1223A, G1533A, G1224A, G1536A,  
G2397A, G2398A, G2404A, G2405A)

5 millicuries (185 MBq)  
(G2310A, G2330A)

LEAK TEST FREQUENCY: 6 Months

PRINCIPAL USE: (N) Ion Generator, Chromatography

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CUSTOM DEVICE:      \_\_\_\_\_ YES      X      NO

**REGISTRY OF RADIOACTIVE SEALED SOURCES AND DEVICES  
SAFETY EVALUATION OF DEVICE  
(AMENDED IN ITS ENTIRETY)**

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**DEVICE TYPE:** Electron Capture Detector**DESCRIPTION:**

The Models G1223A and G1224A electron capture detector (ECD) assemblies are similar to the previously approved Models 19233 and 19235. The model G1223A will be distributed to persons generally licensed and the Model G1224A will be distributed to persons specifically licensed. The two detectors are the same except that the detector label plate is different for general licenses versus specific licenses. The Models G1223A and G1224A ECDs are for use on the Model 5890 Series gas chromatographs. The manufacture of Model G1223A has been discontinued as of March 1, 2004.

The specific differences of the Models G1223A and G1224A relative to the Models 19223 and 19235 are as follows:

1. The detector heat sink is made of aluminum rather than stainless steel. The new heat sink allows the distributor to down rate their heater from 70 watts to 60 watts. This also limits the maximum temperature of the detector. In the event of a catastrophic failure mode, the 5890 gas chromatograph instrument's main processor would detect a shorted sensor fault, and turn off all heaters to devices on the gas chromatograph.
  2. A 17-4 PH stainless steel will be used rather than 303 stainless steel. The supplier of the lower plated block, Amersham Corporation, has indicated that the plating quality of Ni-63 is better with 17-4 PH stainless steel. A 17-4 PH stainless steel lower block is currently being used on Models 19303 and 19312 ECD's. The inside of the lower block will be plated with non-radioactive nickel prior to plating of the Ni-63 radionuclide.
  3. A metal seal will be used between the lower block (cathode) and the upper block (anode) that is currently used on other ECDs being distributed (for example, Models 18713A, 19282 and 18803-60520). This particular seal uses a silver crushable O-ring. The same tamper proof screws now used on all of the distributor's distributed ECDs will be used.
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REGISTRY OF RADIOACTIVE SEALED SOURCES AND DEVICES  
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DEVICE TYPE: Electron Capture Detector

DESCRIPTION (cont.):

4. The upper anode block design has been redesigned. The non-plated part has reduced mass, a purged anode which has been raised (withdrawn) from the region of the nickel-63 plating within the lower block (cathode). The purged anode remains cleaner and is retained with a special nut and seal removable only with the distributor's anode wrench.
5. The outer cover and insulation are different than the 19233 and 19235 merely to accommodate the new gas chromatograph. The detector label plates will have the same information as our current detectors and will remain permanently attached to a tamper proof screw.

The Models G1533A and G1536A ECD assemblies are same as the Models G1223A and G1224A with the exception of modifications to the mounting hardware and the outer cover and insulation for use with a different gas chromatograph. The Model G1533A will be distributed to persons generally licensed and the Model G1536A will be distributed to persons specifically licensed. The two detectors are the same except that the detector label plate is different for general licenses versus specific licenses. The Models G1533A and G1536A ECDs are for use on the distributor's Model 6890 gas chromatographs.

The Models G2310A and G2330A are identical to the Models G1533A and G1223A respectively, except that the G2310A and G2330A will only contain up to 5 mCi (185 MBq) of Ni-63. The sources will be plated in the same manner as those in the Models G1533A and G1223A.

Models G2397A, G2398A, G2404A, and G2405A are almost identical to the ECD's described above. These ECDs still contain up to 15 mCi (555 MBq) of Ni-63, but instead of being plated onto the lower cell body the radioactive material is plated on a thin nickel cylinder. The cylinder is then press-fitted into the stainless steel lower body. The Model G2397A ECD is for use on both the distributor's Model 6890 and 6850 gas chromatographs. The Model G2398A is for use on the distributor's Model 6890 gas chromatograph.

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DEVICE TYPE: Electron Capture Detector

DESCRIPTION (cont.):

The upper body then attaches to the lower body with the same tamper-proof screws used in all designs. All ten ECDs are approximately 4" (10 cm) long and 1-1/8" (2.86 cm) in diameter at their widest location. General licensees never receive the tamper proof screws wrench or solvent cleaning/disassembly instructions.

Prior to 2000, the devices were distributed under the company name "Hewlett Packard". In 2000, the company split and the products were manufactured under the new company name of "Agilent Technologies". Agilent Technologies accepts returns of both Hewlett Packard and Agilent Technologies devices. The devices are cleaned and refurbished, then redistributed as initial distributions to new recipients.

LABELING:

Each cell is stamped with the radiation symbol, the words, "Caution-Radioactive Material," the isotope and activity. Label plates are attached by cable to a tamper proof screw on the detector body. Users are instructed not to remove these plates. The plate contains the radiation symbol, the words, "Caution-Radioactive Material," the isotope, activity, model number, serial number, date, the words, "Electron Capture Detector," and the distributor name and logo. Additionally, for the Models used by general licensees, the plate contains the labeling requirements of 10 CFR 32.51(a), and refers the user to an instruction manual that tells them not to open or chemically clean the cell.

Devices distributed as of 2000 list "Agilent Technologies". Prior to 2000, the devices were distributed under the company name "Hewlett Packard", and the distributor is listed as "Hewlett Packard". Detector cells that had initially been distributed by

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DEVICE TYPE: Electron Capture DetectorLABELING (cont.):

"Hewlett Packard", and that are redistributed by "Agilent Technologies", list the distributor as "Agilent Technologies (Original Manufacturer: Hewlett-Packard Co.)", and indicate the original Hewlett Packard serial number and manufacturing date, in order to maintain traceability and to preserve accurate age information.

DIAGRAM:

See attachments 1, 2 and 3.

CONDITIONS OF NORMAL USE:

Each ECD is designed to be used in conjunction with gas chromatographs in analytical laboratories. Each ECD will be used in laboratory environs and by persons trained in the use of gas chromatography equipment. The ECD will normally be operated at temperatures up to 410°C (770°F). The working life of the ECDs is > 10 years.

PROTOTYPE TESTING:

Hewlett Packard tested the detector cells G1223A, G1533A, G2330A, G2310A, G1224A and G1536A to the criteria used on their presently licensed detector cells. The tests consisted of:

- Pressure test to 60 psi (414 kPa).
- Drop test from 1.5 meters (59").
- Vibration test to 55 Hz with an amplitude of 0.015" (0.38 mm).
- Freeze test to -40°C (-40°F).
- Loss of Nickel-63 in carrier gas during normal use.
- Loss of Nickel-63 from detector when all heat control systems fail.
- Loss of Nickel-63 during solvent cleaning of the detector.
- ~~• Loss of Nickel-63 at abnormally high temperatures (625°C [1157°F] and 800°C [1472°F]).~~

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DEVICE TYPE: Electron Capture Detector

PROTOTYPE TESTING (cont.):

The ECD's met the above tests and exceeded the minimum ANSI N542 classification of 77C32211 for ion generators, chromatography.

The following tests were performed on the G2397A, G2398A, G2404A, and G2405A designs: drop, impact, pressure, elevated temperature, and freeze. Because the ECDs are similar to the approved designs, no further testing was deemed necessary.

EXTERNAL RADIATION LEVELS:

The distributor has reported that radiation levels on all accessible surfaces do not exceed background levels for measurements taken from a detector with 15 millicuries (555 MBq) of Ni-63. Attachment 3 is a dose rate report showing dose rate from an opened detector cell.

QUALITY ASSURANCE AND CONTROL:

The distributor maintains an ISO 9001 quality assurance and control program which has been deemed acceptable for licensing purposes by NRC.

LIMITATIONS AND/OR OTHER CONSIDERATIONS OF USE:

- The Models G1224A and G1536A shall be distributed only to persons specifically licensed by the NRC or an Agreement State.
  - The Models G1223A, G1533A, G2310A, G2330A, G2397A, G2398A, G2404A, and G2405A shall be distributed to persons generally licensed by the NRC or an Agreement State.
  - Handling, storage, use, transfer, and disposal: To be determined by the licensing authority or as required by 10 CFR 31.5 or Agreement State equivalent.
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REGISTRY OF RADIOACTIVE SEALED SOURCES AND DEVICES  
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DEVICE TYPE: Electron Capture DetectorLIMITATIONS AND/OR OTHER CONSIDERATIONS OF USE (cont.):

- The devices shall be leak tested at intervals not to exceed 6 months using techniques capable of detecting 0.005 microcurie (185 Bq) of removable contamination.
- The user may install the device into gas chromatographs. However, the device may not be dismantled in any way by the user unless he obtains a specific license from NRC or an Agreement State to perform such activities.
- This registration sheet and the information contained within the references shall not be changed without the written consent of the NRC.

SAFETY ANALYSIS SUMMARY:

The distributor has submitted sufficient information to provide reasonable assurance that:

- The device can be safely operated by persons not having training in radiological protection.
  - Under ordinary conditions of handling, storage, and use of the device, the byproduct material contained in the device will not be released or inadvertently removed from the source housing, and it is unlikely that any person will receive in any period of one year a dose in excess of 10 percent of the limits specified in Section 20.1201(a), 10 CFR Part 20.
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DEVICE TYPE: Electron Capture Detector

SAFETY ANALYSIS SUMMARY (cont.):

- Under accident conditions associated with handling, storage, and use of the source housing, it is unlikely that any person would receive an external radiation dose or dose commitment in excess of the dose to the appropriate organ as specified in the following chart:

<u>PART OF BODY</u>	<u>DOSE</u>
Whole body; head and trunk; active blood-forming organs; gonads; or lens of eye	15 rem (0.15 Sv)
Hands and forearms; feet and ankles; localized areas of skin averaged over areas no larger than 1 square centimeter	200 rem (2.0 Sv)
Other organs	50 rem (0.50 Sv)

Based on review of the ECD Models listed in this certificate of registration, and the information and test data cited below, we continue to conclude that the devices are acceptable for licensing purposes.

Furthermore, we continue to conclude that the devices would be expected to maintain their containment integrity for normal conditions of use and accidental conditions which might occur during uses specified in this certificate.

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DEVICE TYPE: Electron Capture DetectorREFERENCES:

The following supporting documents for the ECDs are hereby incorporated by reference and are made a part of this registry document.

- Hewlett-Packard's letters dated January 30, 1990, February 2, 1990, May 9, 1990, September 17, 1990, October 3, 1990, October 10, 1990, June 8, 1994, August 4, 1995, April 9, 1996, May 6, 1996, June 19, 1996, August 19, 1999, and November 1, 1999, with enclosures thereto.
- Agilent Technologies' letters dated, February 21, 2002, October 24, 2001, October 19, 2001, September 4, 2001, March 9, 2001, March 5, 2001, May 24, 2000, March 2, 2000, February 18, 2000, November 21, 1999, November 15, 1999, and November 1, 1999, with enclosures thereto.
- Agilent Technologies' letter dated September 26, 2003, email dated February 27, 2004, and email dated March 31, 2004, with enclosures thereto.

ISSUING AGENCY:

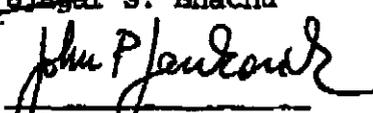
U.S. Nuclear Regulatory Commission

Date: April 1, 2004

Reviewer:

  
Vijayar S. BhachuDate: April 1, 2004

Concurrence:

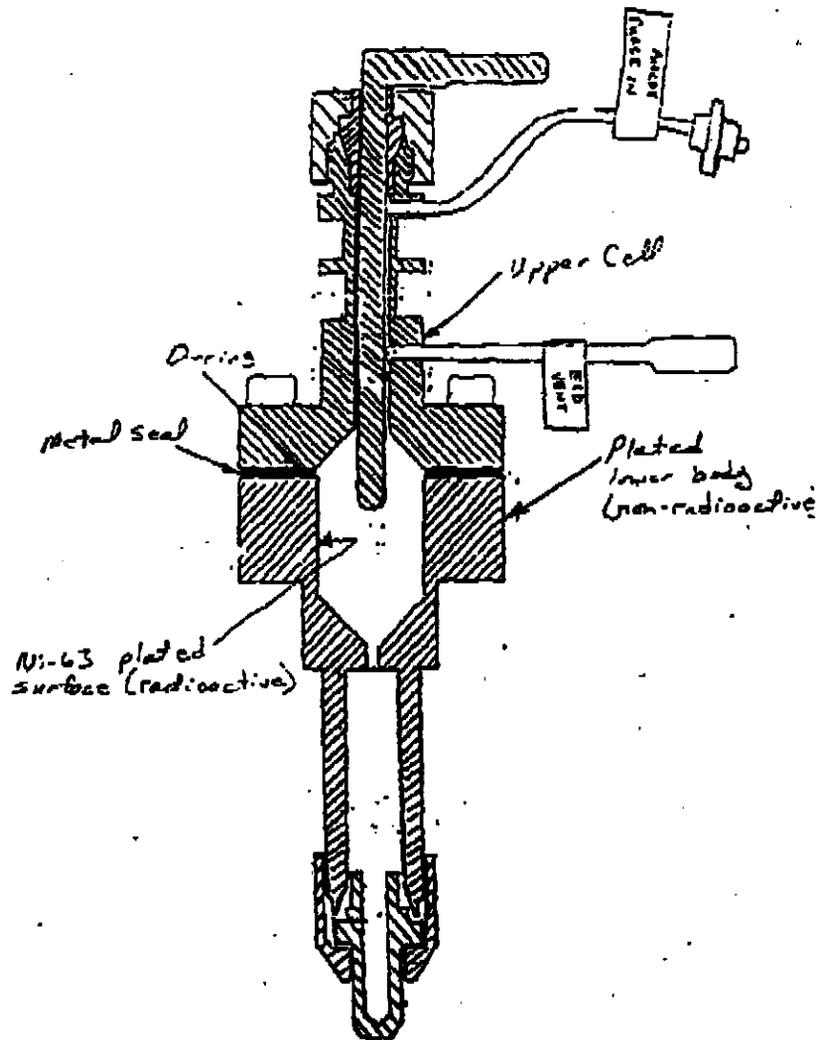
  
John P. Jankovich

REGISTRY OF RADIOACTIVE SEALED SOURCES AND DEVICES  
SAFETY EVALUATION OF DEVICE  
(AMENDED IN ITS ENTIRETY)

NO.: NR-348-D-111-B

DATE: April 1, 2004

ATTACHMENT 1



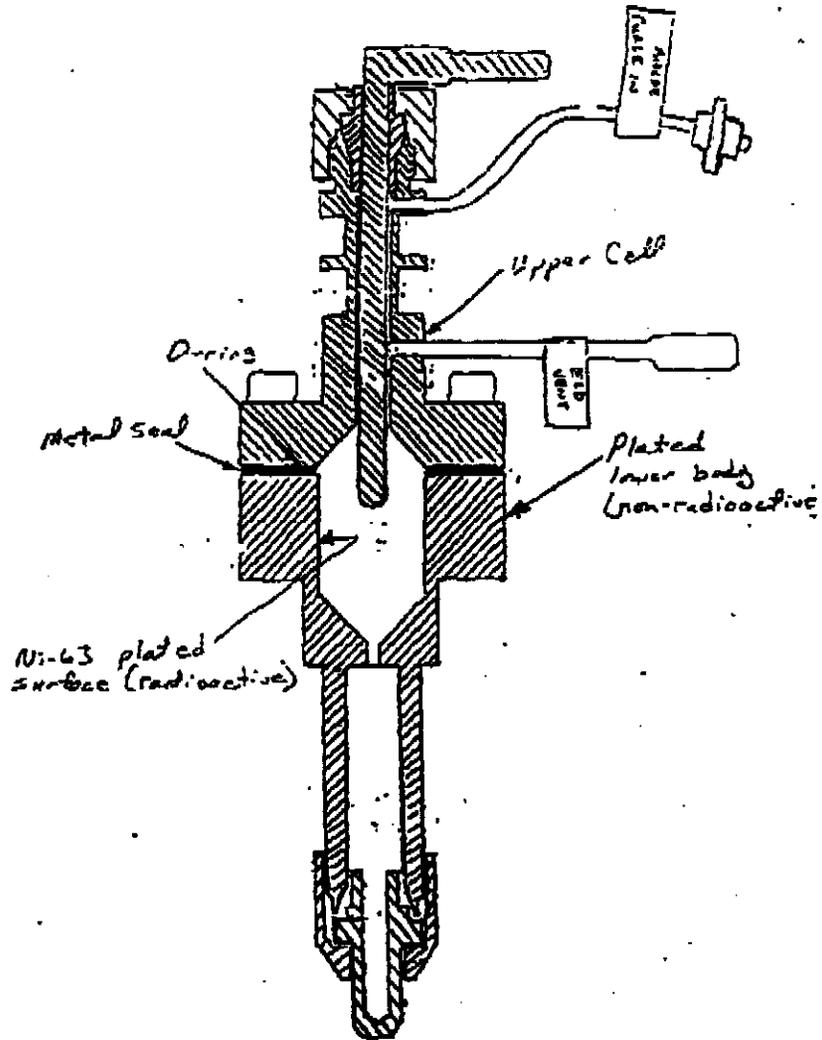
Models G1223A, G1533A, G2310A, G2330A, G1224A, and G1536A

REGISTRY OF RADIOACTIVE SEALED SOURCES AND DEVICES  
SAFETY EVALUATION OF DEVICE  
(AMENDED IN ITS ENTIRETY)

NO.: NR-348-D-111-B

DATE: April 1, 2004

ATTACHMENT 1



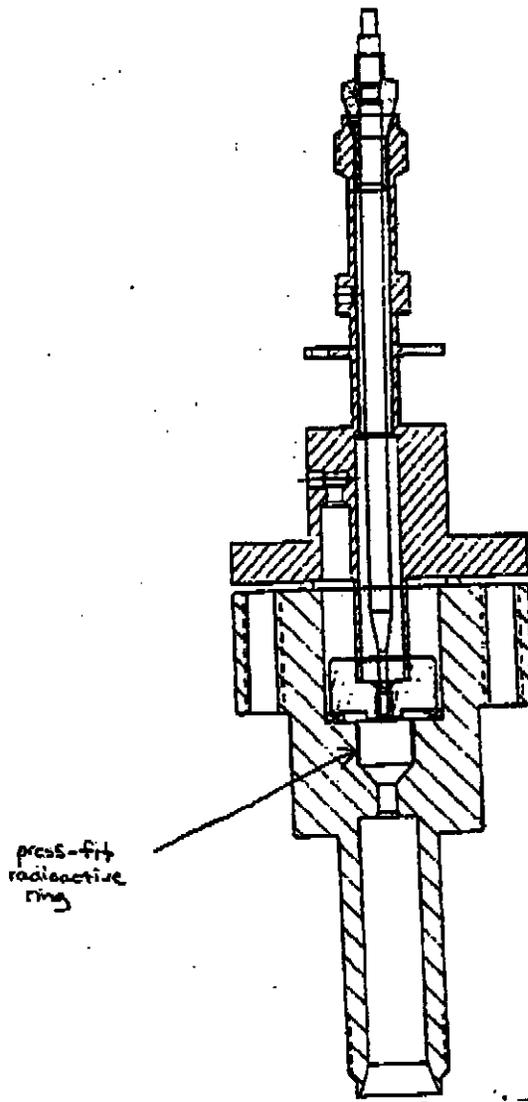
Models G1223A, G1533A, G2310A, G2330A, G1224A, and G1536A

REGISTRY OF RADIOACTIVE SEALED SOURCES AND DEVICES  
SAFETY EVALUATION OF DEVICE  
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NO.: NR-348-D-111-B

DATE: April 1, 2004

ATTACHMENT 2



Models G2397A, G2398A, G2404A, and G2405A

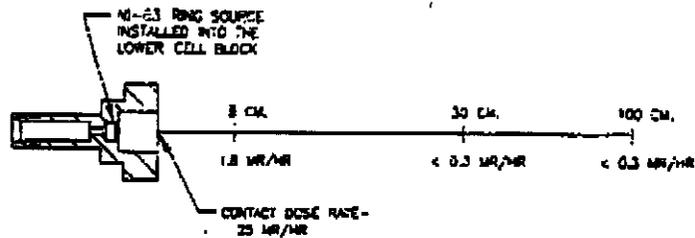
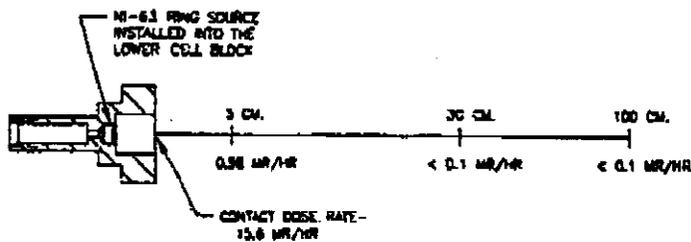
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REGISTRY OF RADIOACTIVE SEALED SOURCES AND DEVICES  
SAFETY EVALUATION OF DEVICE  
(AMENDED IN ITS ENTIRETY)

NO.: NR-348-D-111-B

DATE: April 1, 2004

ATTACHMENT 3

NER-004P NI-63 RING SOURCE DOSE RATE REPORTBETA (SHALLOW) DOSE RATESGAMMA (DEEP) DOSE RATESNOTES

1. Source used: NER-004P 15 mCi Ni-63 on 4/98.
2. Beta dose rate measurements are performed with 'Landauer' Type G film badges having 7 milligrams/square centimeter filter. Minimum detectable dose rate is 0.3 mR/hour.
3. Gamma dose rate measurements are performed with 'Landauer' Type G film badges having 300 milligrams/square centimeter filter. Minimum detectable dose rate is 0.1 mR/hour.

# Thermo MeasureTech

TN Technologies + Kay Ray + Sensall

2555 North IH-35  
Round Rock, TX 78664

(512) 388-9100  
(800) 736-0801  
Fax: (512) 388-9200  
www.thermomeasuretech.com

## ACKNOWLEDGMENT OF RECEIPT OF RADIOACTIVE MATERIAL

February 9, 2002

BASF Corporation  
1609 Biddle Ave.  
Wyandotte, MI 48192

RMA Number 27411

Attention Brad Martin:

This is to certify that Thermo MeasureTech has received and accepted ownership of the radioactive material described below pursuant to applicable regulations and as authorized by our Texas Radioactive Material License L03524.

Manufacturer	Model	Serial	Isotope	Source	Activity Units	Assay
TN TECHNOLOGIES	5205	B26	Cs-137	GV-0121	50 mCi	5/19/83
TN TECHNOLOGIES	5206	B36	Cs-137	MB-3771	200 mCi	9/6/83
TN TECHNOLOGIES	5205	B27	Cs-137	GV-0124	50 mCi	5/19/83

Summary (3 sources)

300 mCi

This receipt should be retained in your files as a permanent record showing the disposition of this radioactive material. If you are not the Radiation Safety Officer or responsible for maintaining regulatory records for radioactive material, please forward this letter to the appropriate person.

If you have any questions or require additional assistance, please contact us at 512-388-9100 or 800-736-0801.

Sincerely,  
Thermo MeasureTech



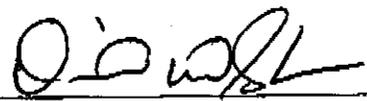
Martha Hernandez  
Licensing & Regulatory Specialist

# BILL OF LADING

<b>CONSIGNEE:</b> Thermo MeasureTech 2555 North IH-35 Round Rock, TEXAS 78664	<b>SHIPPER:</b> BASF CORPORATION 1609 BIDDLE AVE. WYANDOTTE, MI 48192
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NATURE AND QUANTITY OF CONTENTS		PACKAGE			
PROPER SHIPPING NAME	FORM	ACTIVITY	CATEGORY	TRANSPORT INDEX	TYPE
HAZARDOUS MATERIALS DESCRIPTIONS AND PROPER SHIPPING NAME (FORM 49 CFR 172.101 HAZARDOUS MATERIALS TABLE)	CHEMICAL FORM AND PHYSICAL STATE (GAS/ LIQUID/SOLID) OR SPECIAL FORM	NUMBER OF BECQUERELS AND CURIES	I - WHITE OR II - YELLOW OR III - YELLOW LABEL	FOR YELLOW LABEL CATEGORIES ONLY	TYPE A OR TYPE B
RADIOACTIVE MATERIAL, Type A PACKAGE, 7 UN2915, Cs-137 ERG 163	SOLID	7.4 GBq (200 mCi)	II - YELLOW	0.3	A
RADIOACTIVE MATERIAL, Type A PACKAGE, 7 UN2915, Cs-137 ERG 163	SOLID	1.85 GBq (50 mCi)	II - YELLOW	0.4	A
RADIOACTIVE MATERIAL, Type A PACKAGE, 7 UN2915, Cs-137 ERG 163	SOLID	1.85 GBq (50 mCi)	II - YELLOW	0.3	A

This is to certify that the above-named materials are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation according to the applicable regulations of the Department of Transportation.  
**FOR EMERGENCY 24 HRS. 1-800-832-HELP**

RMA #: 27411  
 REMARKS:  
 BASF P.O. # 100445618  
 for 3 RETURNED GAUGES.  
  
 AUTHORIZED SIGNATURE

12/12/01  
 DATE

**Thermo MeasureTech**

2555 North IH-35  
 Round Rock, Texas 78664  
**Emergency Telephone: (512) 388-9310**  
 Telephone: (512) 388-9100  
 Fax: (512) 388-9200  
[www.thermomeasuretech.com](http://www.thermomeasuretech.com)

NATIONAL LEAK TEST CENTER

NLTC Industries, Inc.  
P.O. Box 1480, N. Tonawanda, NY 14120  
Phone 716-693-2550 TIN 16-1234141

Gauge  
WIPES

DATE: 12/19/2001

INVOICE NO. 28041

CUSTOMER NUMBER: 11732

PURCHASE ORDER: PREPAID AMEX

SHIP TO:

MR MARK MCKINNEY  
INDUSTRIAL HYGIENIST  
BASF CORP  
1609 BIDDLE AVE  
WYANDOTTE MI 48192

BILL TO:

ACCTS PAYABLE  
INDUSTRIAL HYGIENIST  
BASF CORP  
1609 BIDDLE AVE  
WYANDOTTE MI 48192

DESCRIPTION	QUANTITY	PRICE	EXTENSION	TOTAL DUE
BETA LEAK TEST	5	\$50.00	\$250.00	
		Sales Tax	\$0.00	\$250.00

\* \* LEAK TEST CERTIFICATE \* \*

NUMBER OF SAMPLES: 10

TEST METHOD: WET WIPE

RADIONUCLIDE AS IDENTIFIED BY CUSTOMER IS CESIUM-137

ANALYSED FOR BETA CONTAMINATION USING WINDOWLESS PROPORTIONAL COUNTER

SAMPLES TAKEN BY CUSTOMER

ANALYSED BY L KEATING

\* \* TEST RESULTS \* \*

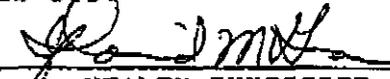
DEVICE I D	SAMPLE I D	MICROCURIES/SAMPLE	PASS/FAIL
s/n B-25	Sample #1	< 16 x 10E-6	PASS
s/n B-26	Sample #2	< 16 x 10E-6	PASS
s/n M0079	Sample #1	< 16 x 10E-6	PASS
s/n M0079	Sample #2	< 16 x 10E-6	PASS
s/n 75740	Sample #1	< 16 x 10E-6	PASS
s/n 75740	Sample #2	< 16 x 10E-6	PASS
s/n B-27	Sample #1	< 16 x 10E-6	PASS
s/n B-27	Sample #2	< 16 x 10E-6	PASS
s/n B-36	Sample #1	< 16 x 10E-6	PASS

LIMIT IS 5000 x 10E-6 MICROCURIES PER DEVICE

TESTED UNDER NYS DOL LICENSE #2323-3154

DATE: 12/19/2001

SIGNED BY

  
HEALTH PHYSICIST

CONTINUATION OF PO PREPAID AMEX

CONTINUATION OF INV NO. 23241

\* \* TEST RESULTS \* \*

DEVICE I D	SAMPLE I D	MICROCURIES/SAMPLE	PASS/FAIL
s/n B-36	Sample #2	< 16 x 10E-6	PASS

LIMIT IS 5000 x 10E-6 MICROCURIES PER DEVICE

TESTED UNDER NYS DOL LICENSE #2323-3164

DATE: 12/19/2001

SIGNED BY



HEALTH PHYSICIST

PAGE 2 OF 2