NRC FORM 313 (10-2005) 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: 10/31/2008

Estimated burden per response to comply with this mandatory collection request: 4.4 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. Send comments regarding burden estimate to the Records and FOIA/Privacy Services Branch (T-5 F53), U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001, or by internet e-mail to infocollects@nrc.gov, and to the Desk Officer, Office of Information and Regulatory Affairs, NEOB-10202, (3150-0120), Office of Management and Budget, Washington, DC 20503. If a means used to impose an information collection does not display a currently valid OMB control number, the NRC may not conduct or sponsor, and a person is not required to respond to, the information collection.

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:

ALABAMA, CONNECTICUT, DELAWARE, DISTRICT OF COLUMBIA, FLORIDA, GEORGIA, KENTUCKY, MAINE, MARYLAND, MASSACHUSETTS, MISSISSIPPI, NEW HAMPSHIRE, NEW JERSEY, NEW YORK, NORTH CAROLINA, PENNSYLVANIA, PUERTO RICO, RHODE ISLAND, SOUTH CAROLINA, TENNESSEE, VERMONT, VIRGINIA, VIRGIN ISLANDS, OR WEST VIRGINIA, SEND APPLICATIONS TO:

LICENSING ASSISTANCE TEAM
DIVISION OF NUCLEAR MATERIALS SAFETY
U.S. NUCLEAR REGULATORY COMMISSION, REGION I
475 ALLENDALE ROAD
KING OF PRUSSIA, PA 19406-1415

IF YOU ARE LOCATED IN:

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

Br. 3

MATERIALS LICENSING BRANCH
U.S. NUCLEAR REGULATORY COMMISSION, REGION III
2443 WARRENVILLE ROAD, SUITE 210
LISLE, IL 60532-4352

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 BRANCH
U.S. NUCLEAR REGULATORY COMMISSION, REGION IV
611 RYAN PLAZA DRIVE, SUITE 400
ARLINGTON, TX 76011-4005

030 34704

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)*

X

- ☐ A. NEW LICENSE
- ☐ B. AMENDMENT TO LICENSE NUMBER
- ☑ C. RENEWAL OF LICENSE NUMBER 52-25430-01

2. NAME AND MAILING ADDRESS OF APPLICANT *(Include ZIP code)*

David Rhoe
CRMI
Paseo de la Fuente, D-4 Calle Tivoli
San Juan, PR 00926-6459

3. ADDRESS WHERE LICENSED MATERIAL WILL BE USED OR POSSESSED

David Rhoe
CRMI
Paseo de la Fuente, D-4 Calle Tivoli
San Juan, PR 00926-6459

4. NAME OF PERSON TO BE CONTACTED ABOUT THIS APPLICATION

David Rhoe

TELEPHONE NUMBER

(787) 245-7248

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. maiximum 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. LICENSE FEES *(See 10 CFR 170 and Section 170.31)*

FEE CATEGORY 3P AMOUNT ENCLOSED $ 0.00

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 CONTANED 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
David Rhoe, CEO	David Rhoe	07/08/2008

FOR NRC USE ONLY

TYPE OF FEE	FEE LOG	FEE CATEGORY	AMOUNT RECEIVED	CHECK NUMBER	COMMENTS
			$		
APPROVED BY				DATE	142614

NRC FORM 313 (10-2005) PRINTED ON RECYCLED PAPER

NMSS/RGN1 MATERIALS-002

David Rhoe
CRMI
Paseo de la Fuente
D-4 Calle Tivoli
San Juan, PR 00926-6459

July 10, 2008

U.S. Nuclear Regulatory Commission
Region I
475 Allendale Road
King of Prussia, PA 19406

Dear Sir or Madam:

Please find enclosed a renewal application for the use and handling of radioactive materials for license 52-25430-01.

If your need any further information, please feel free to contact me at (787) 245-7248.

Sincerely,

David Rhoe, MS, WSO-CHME, WSO-CSI
Health/Medical Physicist

Item 1 Address

a) Mailing address
David Rhoe
Paseo de la Fuente
D-4 Calle Tivoli
San Juan, PR 00926-6459
(787) 245-7248
Fax (787) 292-7976

b) Main Office address
David Rhoe
Paseo de la Fuente
D-4 Calle Tivoli
San Juan, PR 00926-6459
(787) 245-7248
Fax (787) 292-7976

c) Physical location (storage/location of the Nuclear gauge & records)
David Rhoe
Paseo de la Fuente
D-4 Calle Tivoli
San Juan, PR 00926-6459
(787) 245-7248
Fax (787) 292-7976

Please authorize the use at any temporary job site location within US territories.

The following is based on Portable Gauge Licenses, NUREG 1556 Vol 1, November 2001, Appendix B

Item 5 and 6: Materials to be Possessed and Proposed Uses

Radioisotope	Manufacturer or chemical and/or physical form	Quantity	Use as Listed on SSD Certificate	Other Uses Not Listed on SSD Certificate
A. Any byproduct material with atomic nos. 1-83	Analytical samples	1 millicurie	NA	NA
B. Cesium 137	Sealed Sources (Amersham Model 77302)	165 millicuries	Yes	NA
C. Cesium 137	Sealed Sources (IPL Model GF-137)	10 microcuries	NA	NA
D. Americium 241	Sealed Sources (IPL Model GF-241)	10 microcuries	NA	NA

E. Cesium 137	Sealed Sources (AEA/QSA Model CDCW556; IPL Model HEG-137; HIS Dwg. Model 2200064; CPN Model CPN-131; AEA Model CDC.800, 804, 805, AMN.6002; 3M Model 4P6M; NSS Model AN-HPG, GT-GHP; IPL HEG-137)	9 millicuries per source (AEA/QSA and IPL); 11 millicuries per source (HSI); 10 millicuries per source (CPN); 10 millicuries per source (AEA, 3M, NSS and IPL) and 2000 millicuries total	Yes	NA
F. Am-241	Sealed Sources (AEA/QSA Model AMNV.997; HIS Dwg. Model 2200067; IPL Models Am1.N02, 3021 and 3027; CPN Model CPN-131; AEA Model AMN.Q1954, AMN.PE5, AMN.V997; DuPont Merck NER-550; NSS Model AN-HPG, AN-HP; IPL AM1.NO2)	44 millicuries per source (AEA/QSA; HSI and IPL); 50 millicuries per source (CPN); 50 millicuries per source (AEA; DuPont Merck: NSS and IPL) and 10,000 millicuries total	Yes	NA
G. Californium 252	Sealed Sources (IPL Model HEG-252	66 microcuries	Yes	NA
H. Ra-226	Sealed Sources (AEA Model RAN.C1: Radium Chemical Co. Dwg. 21.94 or RAN-W25	5.5 millicuries per source and 110 millicuries total	Yes	NA
I. Strontium 90	Sealed sources (Atlantic Research Model B-1; Nuclear Assoc. Model 67-850; IPL Model 4850, NEN Model NB-1, Manux Technical Model M-1 and Amersham Model SIA.20)	750 millicuries	Yes	NA

Use:

A. Taking of leak test samples; analysis of test samples as a service for other persons as defined in 10 CFR 20.1003; calibration of instruments.

B. In an AEA Technology Model 773/77314 Calibrator for calibration of instruments as a service for other persons as defined in 10 CFR 20.1003.

C. As reference sources for calibration of instruments.

D. As reference sources for calibration of instruments.

E. through G. In Humboldt Scientific, Inc. Model 551, Troxler Electronic Laboratories Model 3400 Series, CPN MC Series, and Seaman Nuclear Corporation Models R-75BP, C-75BP, C-200, and C-300 Series portable gauging devices for calibration, repair and training.

H. In Seaman Nuclear Corporation Models R-75BP, C-75BP, C-200, and C-300 Series portable gauging devices for calibration, repair and training.

I. For possession incident to disposal/transfer.

Nuclear Gauge Calibration
Use E, F, G, and H

Item No. and Title	Response
7. Individual(s) responsible for the radiation safety program and their training and experience – Radiation Safety Officer. Name: David Rhoe	Before obtaining licensed material, the proposed RSO will have successfully completed one of the training courses described in Criteria in the section entitled "individuals(s) Responsible for Radiation Safety Program and Their Training and Experience-Radiation Safety Officer" in NUREG-1556, Vol 1, Rev. 1 dated November 2001.
8. Training for individuals working in or frequenting Restricted areas.	Before using licensed materials, authorized users will have successfully completed one of the training course described in Criteria in the section entitled "Training for Individuals Working In or Frequenting Restricted Areas" in NUREG-1556, Vol 1, Rev. 1 dated November 2001.
9. Facilities and equipment.	No information needs to be submitted in response to this item; key issues are addressed under "Radiation Safety Program – Public Dose" and "Radiation Safety Program – Operating and Emergency Procedures."
10. Radiation Safety Program – Audit Program.	The applicant is not required to, and should not, submit its audit program to NRC for review during the licensing phase.
10. Radiation Safety Program – Termination of activities.	The applicant is not required to submit a response to the termination of activities section during the initial application. However, when the license expires when the licensee ceases operation, NRC Form 314 must be submitted.
10. Radiation Safety Program – Survey Instrument. 3 – Ludlum 14C 2 – Ludlum 2401-EW	We will either possess and use, or have access to and use, a radiation survey meter that meets the Criteria in the section entitled "Radiation Safety Program – Instruments" in NUREG-1556, Vol 1, Rev. 1 dated November 2001.
10. Radiation Safety Program – 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.
10. Radiation Safety Program – Occupational Dosimetry.	Either we will maintain, for inspection by NRC, documentation demonstrating that unmonitored individuals are not likely to receive a radiation dose in excess of 10 percent of the allowable limits in 10 CFR Part 20, or we will provide Dosimetry processed and evaluated by an NVLAP approved processor that is exchanged at a frequency recommended by the processor.
10. Radiation Safety Program – 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.
10. Radiation Safety Program – Operating and Emergency Procedures.	Operating and emergency procedures will be developed, implemented, and maintained and will meet the Criteria in the section entitled "Radiation Safety Program – Operating and Emergency Procedures" in NUREG-1556, Vol 1, Rev. 1 dated November 2001
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 Sources and Device Registration Sheets. 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 Agreement State to provide leak tests kits to other licensees and according to the kit supplier's instructions.

10. Radiation Safety Program – Maintenance.	*Routine Cleaning and Lubrication* We will implement and maintain procedures for routine maintenance of our gauges according to each manufacturer's recommendations and instructions. *Non-Routine Maintenance* We will implement and maintain procedures for routine maintenance of our gauges according to each manufacturer's recommendations and instructions that require the removal of the source or source rod from the gauge.
10. Radiation Safety Program – Transportation.	The applicant is not required to submit a response to transportation during the licensing process. However, this issue will be reviewed during an inspection.
11. Waste Management – Gauge Disposal and 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.

Service Provider:
Radiation equipment calibration, leak test analysis
Use A, B, C, D, and I

Item No. and Title	Response
7. Individual(s) responsible for the radiation safety program and their training and experience – Radiation Safety Officer. Name: David Rhoe	Before obtaining licensed material, the proposed RSO will have successfully completed one of the training courses described in Criteria in the section entitled "individuals(s) Responsible for Radiation Safety Program and Their Training and Experience-Radiation Safety Officer" in NUREG-1556, Vol 1, Rev. 1 dated November 2001.
8. Training for individuals working in or frequenting Restricted areas.	Before using licensed materials, authorized users will have receive the training described in Appendix H of Nureg-1556, Vol 18, 'Consolidated Guidance About Materials License: Program-Specific Guidance About Service Provider Licenses,' dated November 2000.
9. Facilities and equipment.	No Response is Necessary for this section
10. Radiation Safety Program – Radiation Monitoring Instruments.	A description of the instrumentation described in Section 8.10.2 of Nureg-1556, Vol. 18, 'Consolidated Guidance About Materials Licenses; Program-Specific Guidance About Service Provider Licenses,' dated November 2000, that will be used to perform required surveys. "We will use instruments that meet the radiation monitoring instrument specifications published in Appendix J of Nureg-1556, Vol. 18 'Consolidated Guidance About Materials Licenses; Program-Specific Guidance About Service Provider Licenses,' dated November 2000. Additionally, we will implement the model survey meter calibration program published in Appendix J of Nureg-1556, Vol. 18, 'Consolidated Guidance About Materials Licenses; Program-Specific Guidance About Service Provider Licenses,' dated November 2000. We reserve the right to upgrade our survey instruments as necessary."
10. Radiation Safety Program – Material Receipt and Accountability.	"Ordering licensed material and package receipt and opening will follow the model procedures in Appendix K of Nureg-1556, Vol. 18 'Consolidated Guidance About Materials Licenses; Program-Specific Guidance About Service Provider Licenses,' dated November 2000.
10. Radiation Safety Program – Occupational Dosimetry. ALARA	We will have a prospective evaluation and determine 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 monitor individuals in accordance with the criteria in the section entitled 'Occupational Dose' in Nureg-1556, Vol. 18 'Consolidated Guidance About Materials Licenses; Program-Specific Guidance About Service Provider Licenses,' dated November 2000. Annual radiation dose limit does not exceed 2—mR/yr, radiation film badges are not required.
10. Radiation Safety Program – 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.
10. Radiation Safety Program – Surveys	(Non-sealed sources) We will survey our facility and maintain contamination levels in accordance with the survey frequencies and contamination levels published in Nureg-1556, Vol. 18 'Consolidated Guidance About Materials Licenses; Program-

	Specific Guidance About Service Provider Licenses,' dated November 2000.
10. Radiation Safety Program – Leak Tests	Leak testing procedures and analysis will be done by the applicant. We will follow the model procedure in Appendix O of Nureg-1556, Vol. 18 'Consolidated Guidance About Materials Licenses; Program-Specific Guidance About Service Provider Licenses,' dated November 2000.
10. Radiation Safety Program – Maintenance.	We will implement and maintain procedures for conducting routine maintenance of our devices according to each manufacturer's written recommendations and instructions.
10. Radiation Safety Program – Transportation.	The applicant is not required to submit a response to transportation during the licensing process. However, this issue will be reviewed during an inspection.
10. Radiation Safety Program – Waste Management.	We will use the model waste procedures published in Appendix O of Nureg-1556, Vol. 18 'Consolidated Guidance About Materials Licenses; Program-Specific Guidance About Service Provider Licenses,' dated November 2000.
10. Radiation Safety Program – Operating and Emergency Procedures.	We will implement and maintain operating and emergency procedures of our devices according to each manufacturer's written recommendations and instructions.

This is to acknowledge the receipt of your letter/application dated

7/8/08, and to inform you that the initial processing which includes an administrative review has been performed.

Renew (52-25430-01)

[X] There were no administrative omissions. Your application was assigned to a technical reviewer. Please note that the technical review may identify additional omissions or require additional information.

[ ] Please provide to this office within 30 days of your receipt of this card

_____.

A copy of your action has been forwarded to our License Fee & Accounts Receivable Branch, who will contact you separately if there is a fee issue involved.

Your action has been assigned **Mail Control Number** 142614.
When calling to inquire about this action, please refer to this control number.
You may call us on (610) 337-5398, or 337-5260.

NRC FORM 532 (RI)
(6-96)

Sincerely,
Licensing Assistance Team Leader