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D.E. Mueller
MANUFACTURING MANAGER, AMERICAS

February 21, 1997

James M. Bondick, Health Physicist
Division of Nuclear Materials Safety
United States Nuclear Regulatory Commission
Region 1, 475 Allendale Road
King of Prussia, PA 19406-1415

Re: License No. 29-03044-04 - Amendment 1
Docket #030-11084 -- Control No. 123940

Dear Mr. Bondick:

The following information/clarification is offered per your inquiries on the requested amendment to the above named license:

- 1) **The** radiation source we propose adding to our license is a NITON Model XL-309, serial number **D4364**. The Cd-109 source is integrated into an instrument to detect lead in paints and coatings. Delivery of the source is pending approval of our license amendment.
 - Add item **#6(c): "Cadmium 109"**
 - Add item **#8(c): "50 millicuries"**
 - Add item **#9(c): "for possession and use of NITON Model XL-309 for detection of lead in paints/coatings"**

- 2) **Item #10** references the facilities covered by the license:

The "**Bayway** Chemical Plant" is still our primary license facility and is still at 1400 Park Avenue, Linden, New Jersey.

Keep reference to "**Bayway** Chemical Plant" as is.

The "**Bayway** Refinery" was sold in April, 1993 to the TOSCO Corporation and is operated today as the "TOSCO Refining Company". Any licensing for this facility would be done by that company.

- Delete reference to "**Bayway** Refinery".

The "**Bayonne** Chemical Plant and **Bayway** Plant", 250 East 22nd Street, Bayonne, New Jersey, was sold to IMTT also in April of 1993. No radioactive **sources/materials** covered by this license were ever used at the "**Bayonne** Chemical Plant".

- Delete reference to "**Bayonne** Chemical Plant and **Bayway** Plant".

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The other facility currently **owned/operated** by Exxon Chemical Company in New Jersey is the Linden Technology Center, 1900 East Linden Avenue, Linden, New Jersey (approximately 1 mile from the **Bayway** Chemical Plant). We wish to add this facility to the license **only** for use of the portable NITON lead detector. The NITON would be the only licensed source used at this facility and no licensed **source/equipment** would be stored at this facility.

- Add reference to "Linden Technology Center".

3) Mr. Thomas J. Lisk is requested to be added as an authorized user to our license. Mr. Lisk is responsible for maintaining the Radiation Health Program at the Exxon **Bayway** Chemical Plant. His duties include management of the radiation badges for lab associates, conducting leak tests, performing routine **monitoring/surveys**, and interpretation and communication of results as needed. His training was received at the University of Michigan Graduate School of Public Health, Ann Arbor. Mr. Lisk's curriculum included a course entitled "EIH 511 Radiological Health and Radon Control" which was a comprehensive overview of basic radiation principles. The first unit of the course included discussions of basic radiation chemistry, calculations, decay theory, and biochemical and cellular basis of radiation injury. The second unit included the topics of fundamental beta dosimetry, basic instrumentation, the effects of radiation exposure and radiation risk analysis. The last unit of the course focused on radon control which included lectures on radon chemistry, measurement, and health effects.

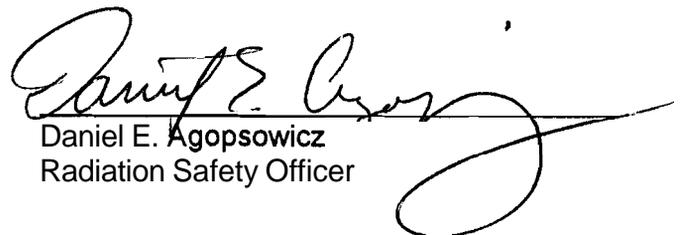
- Delete "Peter S. **DeFao, Jr**". Add "Thomas J. **Lisk**".

4) One other minor correction is requested. **Item 7(b)** reads: "Sealed neutron sources (Texas Nuclear Model 696935)". We have no current or past record of a TN "Model 696935" either in source inventories or license documents. It is our belief that model number reference is a typographical error.

- Delete "(Texas Nuclear Model **696935**)".

We believe these changes will amend our license to be current, complete and accurate. Thank you for the careful attention you have given this matter and for the cooperation you've exhibited.


D. E. Mueller
Manufacturing Manager, Americas


Daniel E. Agopsowicz
Radiation Safety Officer