



4106 New West Drive, Pasadena, Texas 77507

Tel: (281) 291-7769 Fax: (281) 291-7709

www.tracerco.com

August 17, 2009

Br. 4

U.S. Nuclear Regulatory Commission  
Region 1  
475 Allendale Road  
King of Prussia, PA 19406

FedEx: 7978-5825-5300

Attn: Ms. Kathy Modes  
Division of Nuclear Materials Safety

RE: License No. 07-28386-01 – Docket No. 030-31174  
Amendment Request – Condition 8.N, Activation Products

Dear Ms. Modes:

We have been advised by one of our unsealed source suppliers that to avoid any future issues regarding the receipt of activation products we should amend the possession limits authorized by Condition 8.N of our current NRC license (Amendment No. 23). Subsequently, we are requesting that Condition 8.N be amended to increase the **per radionuclide** activity to **1 curie** and the **total** activity to **10 curies**. Pursuant to Condition 9, these activities are for storage only, in "Swage-Lok" containers as activation products. "Swage-Lok" containers are used to contain unsealed source material provided by various reactor suppliers that provide unsealed source material used in tracer studies.

Please contact me as soon as possible if additional information is required to process our amendment request.

Respectfully,

Norman P. Lanier  
Corporate Radiation Safety Officer

cc: Troy Votaw – Tracerco NE Area Supervisor/RSO  
Dave Ferguson – Tracerco Business Development Manager for Tracer Studies

2009 AUG 19 AM 11:06  
RECEIVED  
REGION 1



Johnson Matthey

Tracerco is a trading name of Johnson Matthey Incorporated

144072  
NRC/SS/RGNI MATERIALS-002



4106 New West Drive, Pasadena, Texas 77507

Tel: (281) 291-7769 Fax: (281) 291-7709

www.tracerco.com

August 18, 2009

U.S. Nuclear Regulatory Commission  
Region 1  
475 Allendale Road  
King of Prussia, PA 19406

FedEx: 7978-5825-5300

Attn: Ms. Kathy Modes  
Division of Nuclear Materials Safety

RE: License No. 07-28386-01 – Docket No. 030-31174  
Amendment Request – Condition 17, Tracer Studies

Dear Ms. Modes:

Condition 17 of our current NRC license (Amendment No. 23) prohibits us from introducing byproduct material into a customer's product as contamination in tracer studies if the product is incorporated in any food, beverage, cosmetic, or other commodity or product designed for ingestion or inhalation by, or application to, a human being. We are assuming the intent of this license condition is to re-state the requirements of 10 CFR 32.11(c), which states: "...that the product or material is **not likely** to be incorporated in any food, beverage, cosmetic, or other commodity or product designed for ingestion or inhalation by, or application to, a human being...". So that our Condition 17 parallels the intended requirements of 10 CFR 32.11(c) we are requesting that Condition 17 be amended to include the following suggested wording:

".... The concentrations of byproduct material at the time of transfer shall not exceed the concentrations in 10 CFR 30.70 nor shall **it be likely that** the product be incorporated in any food, beverage, cosmetic, or other commodity or product designed for ingestion or inhalation by, or application to, a human being..."

Please contact me as soon as possible if additional information is required to process our amendment request.

Respectfully,

Norman P. Lanier  
Corporate Radiation Safety Officer

cc: Troy Votaw – Tracerco NE Area Supervisor/RSO  
Dave Ferguson – Tracerco Business Development Manager for Tracer Studies



Johnson Matthey

Tracerco is a trading name of Johnson Matthey Incorporated

This is to acknowledge the receipt of your letter/application dated 8/17/09 and 8/18/09 and to inform you that the initial processing which includes an administrative review has been performed.

Amendments (03031174) 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 144072.  
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