

Arch Chemicals, Inc.
Innovation & Technology Center
1200 Bluegrass Lakes Parkway
Suite 100
Alpharetta, GA 30004
Tel: 678.624.5800



P-7

September 8, 2011

Nuclear Materials Safety Branch
U.S. Nuclear Regulatory Commission, Region 1
475 Allendale Road
King of Prussia, PA 19406-1415
Licensing Assistance Section

Attn.: Thomas Thompson
License Assistance Team

RE: Submission of Decommissioning Records
Material License No. 06-08166-03
Docket No. 030-36891
575795

Subsequent to the letter dated August 10, 2011, additional information is submitted to address the requirement for submission of decommissioning records.

10 CFR 30

(g) Each person licensed under this part or Parts 32 through 36 and 39 of this chapter shall keep records of information important to the decommissioning of a facility in an identified location until the site is released for unrestricted use. Before licensed activities are transferred or assigned in accordance with § 30.34(b), licensees shall transfer all records described in this paragraph to the new licensee. In this case, the new licensee will be responsible for maintaining these records until the license is terminated. If records important to the decommissioning of a facility are kept for other purposes, reference to these records and their locations may be used. Information the Commission considers important to decommissioning consists of—

(1) Records of spills or other unusual occurrences involving the spread of contamination in and around the facility, equipment, or site. These records may be limited to instances when contamination remains after any cleanup procedures or when there is reasonable likelihood that contaminants may have spread to inaccessible areas as in the case of possible seepage into porous materials such as concrete. These records must include any known information on identification of involved nuclides, quantities, forms and concentrations.

There was no occurrence of any spills of this nature.

(2) As-built drawings and modifications of structures and equipment in restricted areas where radioactive materials are used and/or stored, and of locations of possible inaccessible contamination such as buried pipes which may be subject to contamination. If required drawings are referenced, each

— 575795
NMSS/RGN1 MATERIALS-002

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1200 Bluegrass Lakes Parkway
Suite 100
Alpharetta, GA 30004
Tel: 678.624.5800



relevant document need not be indexed individually. If drawings are not available, the licensee shall substitute appropriate records of available information concerning these areas and locations.

Radioactive materials were used only in typical laboratories with no structural modifications. Equipment that would result in possible inaccessible contamination was restricted to typical laboratory hoods and sink traps. These were surveyed as part of the submitted decommissioning survey.

(3) Except for areas containing only sealed sources (provided the sources have not leaked or no contamination remains after any leak) or byproduct materials having only half-lives of less than 65 days, a list contained in a single document and updated every 2 years, of the following:

(i) All areas designated and formerly designated restricted areas as defined in 10 CFR 20.1003 (For requirements prior to January 1, 1994, see 10 CFR 20.3 as contained in the CFR edition revised as of January 1, 1993):

These areas are defined in the submitted decommissioning survey.

(ii) All areas outside of restricted areas that require documentation under § 30.35(g)(1).

There are no areas meet these criteria.

(iii) All areas outside of restricted areas where current and previous wastes have been buried as documented under 10 CFR 20.2108; and

The licensee did not bury or incinerate any radioactive waste on site, or dispose of any radioactive waste to the sanitary sewer. Manifests for off-site disposal by licensed contractors have been submitted.

(iv) All areas outside of restricted areas that contain material such that, if the license expired, the licensee would be required to either decontaminate the area to meet the criteria for decommissioning in 10 CFR part 20, subpart E, or apply for approval for disposal under 10 CFR 20.2002.

No such areas exist.

(4) Records of the cost estimate performed for the decommissioning funding plan or of the amount certified for decommissioning, and records of the funding method used for assuring funds if either a funding plan or certification is used.

No decommissioning funding plan is required under the provisions of the license.

20.2103(b)(4) Records of surveys

No radioactive effluents were released to the environment.

Arch Chemicals, Inc.
Innovation & Technology Center
1200 Bluegrass Lakes Parkway
Suite 100
Alpharetta, GA 30004
Tel: 678.624.5800



We also were licensed to possess Ni-63 sealed sources for electron capture gas chromatography detectors. This provision was removed from our license by amendment in 2007 after all of the sources were disposed of. The final leak tests for these sources are attached.

Source S/N	Disposition	Final wipe test
A-3822	Returned to Varian	6/19/1985
S-8256	Exchanged for S-8104	1/27/1986
S-8104	Exchanged for S-10430	4/27/1987
S-10430	Exchanged for S-10646	11/9/1987
H-2694	Exchanged for H-3577	11/9/1988
S-9987	Exchanged for S-11125	11/30/1989
L-0135	Returned to Hewlett Packard	6/8/1993
H-3577	Returned to Hewlett Packard	6/8/1993
A-1206	Sent to Barnwell	6/8/1993
1549	Sent to Barnwell	6/8/1993
1048	Sent to Barnwell	6/8/1993
1006	Sent to Barnwell	6/8/1993
L-0200	Exchanged for L-3750	10/20/1994
S-11125	Returned to Hewlett Packard	5/2/1995
S-10646	Returned to Hewlett Packard	5/2/1995
218701	Sent to Barnwell	4/25/1997
L-3750	Returned to Hewlett Packard	10/21/1998
A-10933	Returned to Varian	2/27/2007

Sincerely,

James Ritter
Consulting Scientist
Arch Chemicals, Inc.
1200 Bluegrass Lakes Parkway
Alpharetta, GA 30004
678-624-5821
jcritter@archchemicals.com

Nuclear Radiation Development

2937 Air Blvd. North Grand Island, New York 14072
 Telax: 91-578 Telephone: 716-773-7634

NRD

SOLD TO ☐ **OLIN RESEARCH CENTER**
 350 Knollier Drive
 1P.O. BOX 588
 CHESTER, CT 06410-0586
☐ **ACCOUNTS PAYABLE**

000220SHIP TO ☐**6-19-85****ATTN: R. J. THOMAS**

CUSTOMER P.O. **RC-04228** NRD S.O.

DATE OF ANALYSIS
6-19-85

24 **WIPR TEST RESULTS** \$320.00 24 0 \$320.00
 Ser. #s: S9987, 1048, 1006, 1549, H2694.
 S8236, A3822, A1206
 WIPRS TAKEN 4/30/85

LEAK TEST CERTIFICATENUMBER OF SAMPLES ANALYZED (**24**)LEAK TEST METHOD WiprsRADIOACTIVE MATERIAL N1 63

PERSON PERFORMING TEST

/ ANALYSIS

L. Murphy

SAMPLE ANALYZED IN A

(**X**)

WINDOWLESS GAS FLOW PROPORTIONAL COUNTER

()

ALPHA SCINTILLATION COUNTER

()

LIQUID SCINTILLATION COUNTER

()

OTHER

TESTS ARE WITHIN PRESCRIBED LIMITS

GREATER THAN PRESCRIBED LIMITS

TEST RESULTS

WIRE NUMBER	MODEL NUMBER	SERIAL NUMBER	MICROCURIES / SAMPLES
Entrance	S9987		Less than .0001
Housing	"		"
Exit	"		"
Entrance	1048		"
Housing	"		"
Exit	"		"
Entrance	1006		"
Housing	"		"
Exit	"		"
Entrance	1549		"
Housing	"		"
Exit	"		"

SIGNED

TITLE

DATE

Eugene Olakoy HPJune 19, 1985**ORIGINAL CERTIFICATE**

Nuclear Radiation Developments

2342 Air Blvd. North Grand Island, New York 14072
 Telax 716-778-7581 Telephone 716-774-7581

NRDSource: **Olín**

380 Knotters Dr. P.O. Box 846

Cheshire CT 06410-0580

Accounts Payable

000548

SHIP TO **Same**

1-27-86

Attn: **R. J. Thomas**

CUSTOMER P.O.

WV 05484

NRD P.O.

DATE OF ANALYSIS

1-27-86

27 Wipe Test Results

Ser. # H2694, S8256, A1206, S9987, L0200,
 L0135, 1006, 1549, 1048

Wipes Taken 10-24-85, 10-24-85, 11-1-85,
 11-1-85, 11-4-85, 11-4-85,
 11-4-85, 11-4-85, 11-4-85

360.00

27

0

\$360.00

LEAK TEST CERTIFICATENUMBER OF SAMPLES ANALYZED (**27**)LEAK TEST METHOD **Wipes**RADIOACTIVE MATERIAL **Ni 63**

PERSON PERFORMING TEST

ANALYSIS **L. Murphy**

SAMPLE ANALYZED IN A

(**X**)WINDOWLESS GAS FLOW PROPORTIONAL
COUNTER

()

ALPHA SCINTILLATION COUNTER

()

LIQUID SCINTILLATION COUNTER

()

OTHER

TESTS ARE WITHIN PRESCRIBED LIMITS

(**X**)

GREATER THAN PRESCRIBED LIMITS

TEST RESULTS

WIPE NUMBER	MODEL NUMBER — SERIAL NUMBER	MICROCURIES / SAMPLES
Entrance	H2694	Less than .0001
Housing	"	"
Exit	"	"
Entrance	S8256	"
Housing	"	"
Exit	"	"
Entrance	A1206	"
Housing	"	"
Exit	"	"
Entrance	S9987	"
Housing	"	"
Exit	"	"

SIGNED

TITLE

DATE

*Eugene Oleksy***Eugene Oleksy, HP****January 27, 1986****ORIGINAL CERTIFICATE**

NRD Inc. A Subsidiary of Mark IV Industries Inc.

2937 Alt Blvd. North - Grand Island, New York 14072

Telex: 91-578

Telephone: 716-773-7634

NRD

SOLD TO

OLIN CORPORATION
120 Long Ridge Road
P.O. Box 1355
Stamford, CT 06904
Accounts Payable

001349

SHIP TO

OLIN RESEARCH CENTER
350 Knotter Drive
P.O. Box 586
Cheshire, CT 06410
Attn: R. Thomas

5-29-87

CUSTOMER P.O.
RC-0142

NRD S.O.

DATE OF ANALYSIS

4-27-87

15 WIPE TEST RESULTS

\$200.00

\$ 200.00

Serial #'s: S8104, H2694, A1206, L0135, S9987

Wipes taken: 4/20/87

LEAK TEST CERTIFICATE

NUMBER OF SAMPLES ANALYZED (15)

LEAK TEST METHOD WipesRADIOACTIVE MATERIAL Ni 63

PERSON PERFORMING TEST

ANALYSIS Thomas B. Wilkinson

SAMPLE ANALYZED IN A

(X)

WINDOWLESS GAS FLOW PROPORTIONAL
COUNTER

()

ALPHA SCINTILLATION COUNTER

()

LIQUID SCINTILLATION COUNTER

()

OTHER

TESTS ARE WITHIN PRESCRIBED LIMITS

(X)

GREATER THAN PRESCRIBED LIMITS

()

TEST RESULTS

WIPE NUMBER	MODEL NUMBER	SERIAL NUMBER	MICROCURIES / SAMPLES
Entrance	BCD	S 8104	Less than .0001
Housing	"	"	"
Exit	"	"	"
Entrance	BCD	H 2694 5790	Less than .0001
Housing	"	"	"
Exit	"	"	"
Entrance	ECD	A 1206 8	Less than .0001
Housing	"	"	"
Exit	"	"	"
Entrance	ECD	L 0135	Less than .0001
Housing	"	"	"
Exit	"	"	"
Entrance	"	S 9987	Less than .0001
Housing	"	"	"
Exit	"	"	"

S 9987

TITLE

DATE

B Eugene Oleksy, HP
5-28-87*Eugene Oleksy*

NRD Inc. A Subsidiary of Mark IV Industries Inc.

2937 All Blvd. North - Grand Island, New York 14072

Telex: 91-578

Telephone: 716-773-7634

NRD

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OLIN CORPORATION
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P.O. Box 1355
Stamford, CT 06904
Accounts Payable

SHIP TO

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350 Knotter Drive
P.O. Box 586
Cheshire, CT 06410
Attn: J. Thomas

001550**12-17-87**

CUSTOMER P.O.

RC-PT1727

NRD S.O.

DATE OF ANALYSIS

11-9-87

15

WIPN TEST RESULTS**\$200.00****15 0****\$200.00**

Serial #'s: H2694, S10430, A1206, S9987,
L0135

Wipes taken: 10/27/87

LEAK TEST CERTIFICATE

NUMBER OF SAMPLES ANALYZED (15)

LEAK TEST METHOD WipesRADIOACTIVE MATERIAL N1 63PERSON PERFORMING TEST Thomas Wilkinson ANALYSIS

SAMPLE ANALYZED IN A (X) WINDOWLESS GAS FLOW PROPORTIONAL COUNTER

() ALPHA SCINTILLATION COUNTER

() LIQUID SCINTILLATION COUNTER

() OTHER _____

TESTS ARE WITHIN PRESCRIBED LIMITS

(X)

GREATER THAN PRESCRIBED LIMITS

()

TEST RESULTS

WIPE NUMBER	MODEL NUMBER	SERIAL NUMBER	MICROCURIES / SAMPLES
Entrance	H2694		Less than .0001
Housing	"		"
Exit	"		"
Entrance	S10430		"
Housing	"		"
Exit	"		"
Entrance	A1206		"
Housing	"		"
Exit	"		"
Entrance	S9987		"
Housing	"		"
Exit	"		"

SIGNED

TITLE

DATE

Eugene Oleksy

Eugene Oleksy-HP

December 17, 1987

2935 Alt Blvd. North - Grand Island, New York 14072
Telex: 91-578 Telephone: 716-773-7634

NRD

OLIN CORPORATION
120 Long Ridge Road
P.O. Box 1355
Stamford, CT 06904
Accounts Payable

001858

OLIN RESEARCH CENTER
350 Knotter Drive
P.O. Box 586
Cheshire, CT 06410
Attn: R. J. Thomas

11-30-88

NRD'S.O.

RC-CH5723

DATE OF ANALYSIS: 11/11/1964

11-9-80

18

0

\$300.00

Serial #'s: 810646, 89987, 107812, H2694,
L0280, A1206
Wipes taken: 10/24/89

NUMBER OF SAMPLES ANALYZED (18)

LEAK TEST METHOD Wipes

RADIOACTIVE MATERIAL Ni-63

PERSON PERFORMING TEST

ANALYSIS

Thomas Wilkinson

SAMPLE ANALYZED IN A:

X

WINDOWLESS GAS FLOW PROPORTIONAL COUNTER

(

,

ALPHA SCINTILLATION COUNTER

(

)

LIQUID SCINTILLATION COUNTER

(

)

OTHER

TESTS ARE WITHIN PRESCRIBED LIMITS

(X)

GREATER THAN PRESCRIBED LIMITS

$$\left(\begin{array}{c} \cdot \\ \cdot \\ \cdot \end{array} \right)$$

TEST RESULTS

[illegible]

SIGNED

TITLE

Eugene Oleksy-HP

DATE _____

November 30 1988

NRD Inc. A Subsidiary of Mark IV Industries Inc.

2937 Alt Blvd. North - Grand Island, New York 14072

Telex: 91-578

Telephone: 716-773-7634

NRDSOLD TO: ☐ Olin350 Knotter Drive
Cheshire, CT 06410
Accounts PayableSHIP TO ☐

Attn: R. J. Thomas

002112

2/2/90

CUSTOMER P.O.
RC-CH10451

NRD S.O.

DATE OF ANALYSIS

11-30-89

12 Wipe Test Results

\$200.00

12

\$200.00

Serial #: L0200, S10646, 218701, S9987

Wipes taken: 10/30/89

LEAK TEST CERTIFICATE

NUMBER OF SAMPLES ANALYZED (12)

LEAK TEST METHOD Wipe TestLEAK TEST INSTRUMENT NI C7

PERSON PERFORMING TEST

/ ANALYSIS

Gregory McClellan

SAMPLE ANALYZED IN A

(X)

WINDOWLESS GAS FLOW PROPORTIONAL
COUNTER

()

ALPHA SCINTILLATION COUNTER

()

LIQUID SCINTILLATION COUNTER

()

OTHER

TESTS ARE WITHIN PRESCRIBED LIMITS

(X)

GREATER THAN PRESCRIBED LIMITS

()

TEST RESULTS

WIPE NUMBER	MODEL NUMBER	SERIAL NUMBER	MICROCURIES / SAMPLES
Entrance	ECD	L0200	Less than .0001
Housing	ECD	L0200	Less than .0001
Exit	ECD	L0200	Less than .0001
Entrance	ECD	218701	Less than .0001
Housing	ECD	218701	Less than .0001
Exit	ECD	218701	Less than .0001
Entrance	ECD	S9987	Less than .0001
Housing	ECD	S9987	Less than .0001
Exit	ECD	S9987	Less than .0001
Entrance	ECD	S10646	Less than .0001
Housing	ECD	S10646	Less than .0001
Exit	ECD	S10646	Less than .0001

SIGNED

TITLE

Eugene Olekey - HP

DATE

2/2/90*Eugene Olekey*

NRD Inc. A Subsidiary of Mark IV Industries Inc.

2937 Alt Blvd. North - Grand Island, New York 14072

Telex: 91-578

Telephone: 716-773-7634

SOLD TO ☐ Olin Corporation
350 Knotter Dr
Cheshire, CT 06410
Attn: Accts Payable

SHIP TO ☐ Olin Corporation
350 Knotter Dr
Cheshire, CT 06410
Attn: John Bucciarelli

CUSTOMER P.O. ☐ NRD S.O.
RC-4417972

Rec 7/6/93
NRD

003179

6/29/93

DATE OF ANALYSIS
6-8-93

7st Wipe Test Results

\$50.00

7st

\$350.00

Serial #L0200, A1206, 1549, 1048, L0135, 1006, H3577

Wipes Taken 5/13/93

LEAK TEST CERTIFICATE

NUMBER OF SAMPLES ANALYZED (21)

LEAK TEST METHOD Wipe TestRADIOACTIVE MATERIAL N163

PERSON PERFORMING TEST

ANALYSIS

Gregory McCellan

SAMPLE ANALYZED IN A

(X)

WINDOWLESS GAS FLOW PROPORTIONAL
COUNTER

()

ALPHA SCINTILLATION COUNTER

()

LIQUID SCINTILLATION COUNTER

()

OTHER

TESTS ARE WITHIN PRESCRIBED LIMITS

(X)

GREATER THAN PRESCRIBED LIMITS

()

TEST RESULTS

WIPE NUMBER	MODEL NUMBER	SERIAL NUMBER	MICROCURIES / SAMPLES
Entrance	ECD	L0135	Less than .0001 uCi
Housing	ECD	L0135	Less than .0001 uCi
Exit	ECD	L0135	Less than .0001 uCi
Entrance	ECD	1549	Less than .0001 uCi
Housing	ECD	1549	Less than .0001 uCi
Exit	ECD	1549	Less than .0001 uCi
Entrance	ECD	1048	Less than .0001 uCi
Housing	ECD	1048	Less than .0001 uCi
Exit	ECD	1048	Less than .0001 uCi
Entrance	ECD	1006	Less than .0001 uCi
Housing	ECD	1006	Less than .0001 uCi
Exit	ECD	1006	Less than .0001 uCi

SIGNED

TITLE Eugene Olaksy - HPDATE 6/29/93

Continued on next page

Eugene Olaksy

NRD Inc. A Subsidiary of Mark IV Industries Inc.2937 Alt Blvd. North Grand Island, New York 14072
Fax 716-773-7744 Telephone: 716-773-7634

Rec 11/1/94

NRDSOLD TO ☐ **OlIn Research**
350 Knotter Dr
Cheshire CT 06410**003717**

10/18/94

SHIP TO ☐ **OlIn Research Center**
Attn: John Buccarelli
350 Knotter Dr
CHESHIRE CT 06410

CUSTOMER P.O. NRD S.O.

DATE OF ANALYSIS
10/20/94

4sets Wipe Test Results

\$ 50.00

\$200.00

S/N EC218701, 10200, S10646, S11125
Wipes Taken: 10/10/94

PAID IN FULL ON CHECK # 215169

LEAK TEST CERTIFICATE

NUMBER OF SAMPLES ANALYZED (12)

LEAK TEST METHOD Wipe TestRADIOACTIVE MATERIAL Ni-63

PERSON PERFORMING TEST

ANALYSIS

Gregory McClellanSAMPLE ANALYZED IN A (X) WINDOWLESS GAS FLOW PROPORTIONAL
COUNTER
() ALPHA SCINTILLATION COUNTER
() LIQUID SCINTILLATION COUNTER
() OTHERTESTS ARE WITHIN PRESCRIBED LIMITS
GREATER THAN PRESCRIBED LIMITS

(X)

()

TEST RESULTS

WIPE NUMBER	MODEL NUMBER	SERIAL NUMBER	MICROCURIES / SAMPLES
Entrance	ECD	S11125	Less than .0001 uCi
Housing	ECD	S11125	Less than .0001 uCi
Exit	ECD	S11125	Less than .0001 uCi
Entrance	ECD	S10646	Less than .0001 uCi
Housing	ECD	S10646	Less than .0001 uCi
Exit	ECD	S10646	Less than .0001 uCi
Entrance	ECD	L0200	Less than .0001 uCi
Housing	ECD	L0200	Equals .0002 uCi
Exit	ECD	L0200	Less than .0001 uCi
Entrance	ECD	EC218701	Less than .0001 uCi
Housing	ECD	EC218701	Less than .0001 uCi
Exit	ECD	EC218701	Less than .0001 uCi

SIGNED

TITLE

DATE

Eugene Oleksy, Health Physicist

10/20/94

ORIGINAL CERTIFICATE

2937 Alt Blvd. North Grand Island, New York 14072
Fax 716-773-7744 Telephone 716-773-7634

NRD

003532

04/27/05

DATE OF ANALYSIS
05/02/95

\$ 200.00

PAID IN FULL ON CHECK # 270549

NUMBER OF SAMPLES ANALYZED (12)
LEAK TEST METHOD Wipe Test
RADIOACTIVE MATERIAL Ni-63
PERSON PERFORMING TEST ANALYSIS Gregory McClellan
SAMPLE ANALYZED IN A (X) WINDOWLESS GAS FLOW PROPORTIONAL COUNTER
() ALPHA SCINTILLATION COUNTER
() LIQUID SCINTILLATION COUNTER
() OTHER _____

TESTS ARE WITHIN PRESCRIBED LIMITS
GREATER THAN PRESCRIBED LIMITS

[illegible]

Eugene Oleksy, Health Physicist
05/02/95

ORIGINAL CERTIFICATE

NRD Inc. A Subsidiary of Mark IV Industries Inc.2937 Alt Blvd. North Grand Island, New York 14072
Fax 716-773-7744 Telephone: 716-773-7634**NRD**SOLD TO ☐
Olin Chemicals Research
Accounts Payable
350 Knotter Drive
Cheshire CT 06410

4102

SHIP TO ☐
Olin Chemicals Research
Attn: J. Ritter
350 Knotter Drive
Cheshire CT 06410

04/24/97

CUSTOMER P.O.

NRD E.O.

DATE OF ANALYSIS
04/25/97

2 sets Wipe Test Results

\$ 50.00

\$ 100.00

S/N L3750, 218701

Wipes Taken: 04/15/97

LEAK TEST CERTIFICATE

NUMBER OF SAMPLES ANALYZED (6)

LEAK TEST METHOD Wipe TestRADIOACTIVE MATERIAL Ni-63

PERSON PERFORMING TEST

ANALYSIS Gregory McClellanSAMPLE ANALYZED IN A () WINDOWLESS GAS FLOW PROPORTIONAL
COUNTER
() ALPHA SCINTILLATION COUNTER
(X) LIQUID SCINTILLATION COUNTER
() OTHER _____TESTS ARE WITHIN PRESCRIBED LIMITS (X)
GREATER THAN PRESCRIBED LIMITS ()**TEST RESULTS**

WIPE NUMBER	MODEL NUMBER	SERIAL NUMBER	MICROCURIES / SAMPLES
Entrance	ECD	L3750	Less than .0001 uCi
Housing		L3750	Less than .0001 uCi
Exit		L3750	Less than .0001 uCi
Entrance	ECD	218701	Less than .0001 uCi
Housing		218701	Less than .0001 uCi
Exit		218701	Less than .0001 uCi

SIGNED

TITLE

DATE

Brandon L. Graber
Brandon L Graber, Health Physicist
04/25/97

ORIGINAL CERTIFICATE

2937 Alt Blvd. North Grand Island, New York 14072
Fax 716-773-7744 Telephone: 716-773-7634

[illegible]

ALL INFORMATION CONTAINED
HEREIN IS UNCLASSIFIED
DATE 08-10-2010 BY
60322/UCBAW/STP/06810

NRD S.O.

DATE OF ANALYSIS
10/21/98

דעת, ומה שכתבנו

Wings Taken: 10/11/49

PARTE LA FINE - Vige

Lawrence Keating
Lawrence Keating, Health Physicist
10/21/98

ORIGINAL CERTIFICATE

IMPORTANT DOCUMENT

Keep this certificate and future leak test records for display on request by an inspecting radiation official. Failure to supply records may result in a citation, suspension of your license, and/or a fine.

CERTIFICATE OF LEAK TEST

The Electron Capture Detector (ECD) indicated below has been surveyed for external radioactive contamination as indicated in the Ni⁶³ Radiation Safety Manual, Publication 03-913999-00, paragraph 3.

Isotope: Ni⁶³

ISO 2919 Classification C42211

Activity: 555 MBq Maximum (15mCi)

Date: 2/27/07

ECD Serial No: A10933

Model No.: 02-001972-00 Source Serial No: —

The removable radioactivity from the surface of this ECD cell was measured to be:

.00001 microcuries

Note: Varian Chromatography Systems is required by the U.S. NRC and the California Department of Health to inform you that the Ni⁶³ ECD must be leak tested every 36 months.

The California Department of Health - Radiation Authority has granted an extension of the time required between leak tests (for Varian ECDs) from the standard 6 month interval, to a 36 month interval per "Registry of Radioactive Sealed Sources and Devices, Safety Evaluation of Devices," Number CA662D101B, which is on file with all radiation authorities.

Larry Steinwandt
Radiation Safety Officer
Varian Chromatography Systems
2700 Mitchell Drive
Walnut Creek, CA 94598