



**United States Testing Company, Inc.**

1415 Park Avenue • Hoboken, New Jersey 07030  
201-792-2400 • fax: 201-656-0636

030-33619

December 28, 1994

U.S. Nuclear Regulatory Commission  
Industrial Application Section  
Division of Radiation Safety and Safeguards  
Region 1  
475 Allendale Road  
King of Prussia, PA 19406-1415

Attention: Radioactive Materials Licensing

Subject: Radioactive Materials License  
Number 29-02477-01

United States Testing Company, Inc. would like to request an amendment to our Radioactive Materials License as follows:

- Delete Conditions:**
- 6. A., 6. B., 6. C.
  - 7. A., 7. B., 7. C.
  - 8. A., 8. B., 8. C.
  - 9. A. B. & C.

The materials listed in A., B., C. have been transferred to SGS Industrial Services NRC License Number 04-29067-01 (item A.) and/or 04-29067-02 (items B. & C.). Copies enclosed.

In addition, please modify item number 10 so that the address "616 North Street, Jim Thorpe, Pennsylvania" is no longer listed.

Also, Dr. Alan Schoffman is no longer an employee of United States Testing Company, Inc. and his name should be removed from item 11. A.

Thank you for your immediate attention and cooperation in this matter. However, should you require additional information or clarification, please contact the undersigned.

Sincerely,

Lee H. Fredericks  
Radiation Safety Officer

Log	<i>Jan 8 '95</i>
Remitter	
Check No.	
Amount	
Fee Category	<i>3P</i>
To: / For:	<i>Am D</i>
Numbered	<b>121048</b>

OFFICIAL RECORD COPY

ML 10

JAN - 3 1995

Member of the SGS Group

A9

**MATERIALS LICENSE**

Pursuant to the Atomic Energy Act of 1954, as amended, the Energy Reorganization Act of 1974 (Public Law 93-438), and Title 10, Code of Federal Regulations, Chapter I, Parts 30, 31, 32, 33, 34, 35, 40 and 70, and in reliance on statements and representations heretofore made by the licensee, a license is hereby issued authorizing the licensee to receive, acquire, possess, and transfer byproduct, source, and special nuclear material designated below; to use such material for the purpose(s) and at the place(s) designated below; to deliver or transfer such material to persons authorized to receive it in accordance with the regulations of the applicable Part(s). This license shall be deemed to contain the conditions specified in Section 183 of the Atomic Energy Act of 1954, as amended, and is subject to all applicable rules, regulations and orders of the Nuclear Regulatory Commission now or hereafter in effect and to any conditions specified below.

Licensee		
1. SGS Industrial Services		3. License number 04-29067-01
2. 2506 Davis Street San Leandro, CA 94577		4. Expiration date February 28, 1999
		5. Docket or Reference No. 030-33389
6. Byproduct, source, and/or special nuclear material	7. Chemical and/or physical form	8. Maximum amount that licensee may possess at any one time under this license
A. Cesium 137	A. Sealed sources registered pursuant to 10 CFR 32.210 or an equivalent Agreement State regulation	A. Not to exceed 10 millicuries per source and 500 millicuries total
B. Americium 241	B. Sealed neutron source registered pursuant to 10 CFR 32.210 or an equivalent Agreement State regulation	B. Not to exceed 50 millicuries per source and 1500 millicuries total
9. Authorized Use:		
A and B. Storage only of portable and non-portable gauging devices for determining properties of materials and which have been evaluated and approved for licensing purposes under license issued by the Nuclear Regulatory Commission or an Agreement State.		

**CONDITIONS**

10. Licensed material shall be stored at 1415 Park Avenue, Hoboken, New Jersey or 2506 Davis Street, San Leandro, California.
11. The Radiation Safety Officer for this license is Tom Cuthbertson.
12. Licensed material shall be stored under the supervision of Tom Cuthbertson.
13. A. Sealed sources and detector cells shall be tested for leakage and/or contamination at intervals not to exceed 6 months or at such other intervals as specified by the certificate of registration referred to in 10 CFR 32.210.

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CONDITIONS

(Continued)

- B. In the absence of a certificate from a transferor indicating that a leak test has been made within 6 months prior to the transfer, a sealed source or detector cell received from another person shall not be put into use until tested.
- C. Sealed sources need not be leak tested if:
  - (i) they contain not more than 100 microcuries of beta and/or gamma emitting material or not more than 10 microcuries of alpha emitting material; or
  - (ii) they are not designed to emit alpha particles, are in storage, and are not being used. However, when they are removed from storage for use or transferred to another person, and have not been tested within the required leak test interval, they shall be tested before use or transfer. No sealed source or detector cell shall be stored for a period of more than 10 years without being tested for leakage and/or contamination.
- D. The leak test shall be capable of detecting the presence of 0.005 microcurie of radioactive material on the test sample. If the test reveals the presence of 0.005 microcurie or more of removable contamination, a report shall be filed with the U.S. Nuclear Regulatory Commission in accordance with 10 CFR 30.50(b)(2), and the source shall be removed immediately from service and decontaminated, repaired, or disposed of in accordance with Commission regulations. The report shall be filed within 5 days of the date the leak test result is known with the U.S. Nuclear Regulatory Commission, Region IV, ATTN: Director, Division of Radiation Safety and Safeguards, 611 Ryan Plaza Drive, Suite 400, Arlington, Texas 76011-8064. The report shall specify the source involved, the test results, and corrective action taken.
- E. The licensee is authorized to collect leak test samples for analysis by Radiation Detection Company or Troxler Electronics Laboratories, Inc. Alternatively, tests for leakage and/or contamination may be performed by persons specifically licensed by the Commission or an Agreement State to perform such services.
- 14. The licensee shall conduct a physical inventory every 6 months to account for all sources and/or devices received and possessed under the license.
- 15. Each portable nuclear gauge shall have a lock or outer locked container designed to prevent unauthorized or accidental removal of the sealed source from its shielded position. The gauge or its container must be locked when in transport, storage or when not under the direct surveillance of an authorized user.
- 16. The licensee is authorized to transport licensed material only in accordance with the provisions of 10 CFR Part 71, "Packaging and Transportation of Radioactive Material."

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17. Any cleaning, maintenance, or repair of the gauge(s) that requires removal of the source rod shall be performed only by the manufacturer or by other persons specifically licensed by the Commission or an Agreement State to perform such services.
18. Sealed sources containing licensed material shall not be opened or sources removed from source holders by the licensee.
19. The licensee shall not acquire licensed material in a sealed source or device that contains a sealed source unless the source or device has been registered with the Nuclear Regulatory Commission under 10 CFR 32.210 or with an Agreement State.
20. The licensee shall not vacate or release to unrestricted use a field office or storage location whose address is identified in Condition 10, without prior NRC approval.
21. The licensee shall maintain records of information related to decommissioning at the offices of SGS Industrial Services, 2506 Davis Street, San Leandro, California and 1415 Park Avenue, Hoboken, New Jersey as specified in 10 CFR 30.35(g) until this license is terminated by the Commission.
22. A. The licensee may not possess and use materials authorized in items 6, 7, and 8, until: 1) the licensee has constructed the facilities and obtained the equipment described in the application and supporting documentation; and 2) the U.S. Nuclear Regulatory Commission, Region IV, ATTN: Director, Division of Radiation Safety and Safeguards, 611 Ryan Plaza Drive, Suite 400, Arlington, Texas 76011-8064, has been notified that activities authorized by the license will be initiated.  
B. Within 30 days of the date of a decision not to complete the facility, acquire equipment, or possess and use authorized material, the licensee must notify the Commission, in writing, of the decision.

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CONDITIONS

23. Except as specifically provided otherwise in this license, the licensee shall conduct its program in accordance with the statements, representations, and procedures contained in the documents, including any enclosures, listed below. The Nuclear Regulatory Commission's regulations shall govern unless the statements, representations and procedures in the licensee's application and correspondence are more restrictive than the regulations.

- A. Application dated May 23, 1988
- B. Letter dated December 6, 1988
- C. Letter dated May 8, 1989
- D. Letter dated February 25, 1991
- E. Letter dated November 23, 1993
- F. Letter dated February 9, 1994
- G. Letter dated March 30, 1994



FOR THE U.S. NUCLEAR REGULATORY COMMISSION

Dated: APR 29 1994

By: James L. Montgomery  
James L. Montgomery  
Senior Material Specialist  
Materials Branch  
Region IV, Walnut Creek Field Office

MATERIALS LICENSE

Pursuant to the Atomic Energy Act of 1954, as amended, the Energy Reorganization Act of 1974 (Public Law 93-438), and Title 10, Code of Federal Regulations, Chapter 1, Parts 30, 31, 32, 33, 34, 35, 39, 40 and 70, and in reliance on statements and representations heretofore made by the licensee, a license is hereby issued authorizing the licensee to receive, acquire, possess, and transfer byproduct, source, and special nuclear material designated below; to use such material for the purpose(s) and at the place(s) designated below; to deliver or transfer such material to persons authorized to receive it in accordance with the regulations of the applicable Part(s). This license shall be deemed to contain the conditions specified in Section 183 of the Atomic Energy Act of 1954, as amended, and is subject to all applicable rules, regulations and orders of the Nuclear Regulatory Commission now or hereafter in effect and to any conditions specified below.

Licensee		
1. SGS Industrial Services		3. License number 04-29067-02
2. 2506 Davis Street San Leandro, California 94577		4. Expiration date September 30, 1999
		5. Docket or Reference No. 030-33390
6. Byproduct, source, and/or special nuclear material	7. Chemical and/or physical form	8. Maximum amount that licensee may possess at any one time under this license
A. Iridium 192	A. Sealed sources registered pursuant to 10 CFR 32.210 or an equivalent Agreement State regulation, and complying with 10 CFR 34.20	A. Not to exceed 2,000 curies total
B. Cobalt 60	B. Sealed sources registered pursuant to 10 CFR 32.210 or an equivalent Agreement State regulation, and complying with 10 CFR 34.20	B. Not to exceed 700 curies total
C. Cesium 137	C. Sealed source (Amersham/TechOps Model 77302)	C. Not to exceed 150 millicuries per source and 450 millicuries total
D. Cobalt 60	D. Sealed source (Amersham/TechOps Model 36907)	D. Not to exceed 10 curies

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9. Authorized use

- A. and B. For use in a compatible gamma radiography exposure device for performing industrial radiography and for storage and/or source exchange in a compatible source changer (see Conditions 10, 11 and 16).
- C. For use in a Amersham Corp. Model 773 calibration device for calibration of radiation survey instruments.
- D. Possession for storage only in an Amersham/TechOps Model 151-H radiography exposure device.

CONDITIONS

10. Authorized Exposure Devices:

Manufacturer and Model Number

Amersham/Technical Operations Model 660  
Amersham Model 402  
Amersham Model 680  
Amersham Model 676

Manufacturer and Model Number

Amersham Model 151  
Gamma Industries Model Gammatron 100A  
Gamma Industries Model Gammatron 200A  
Industrial Nuclear Model IR-100

11. Authorized Source Changers:

Manufacturer and Model Number

Amersham Model 650  
Amersham Model 770  
Amersham Model 771  
Amersham Model C-8

Manufacturer and Model Number

Gamma Industries Model C-10  
SPEC Model C-1  
Industrial Nuclear Model IR-50

12. Licensed material shall be used only at temporary job sites of the licensee anywhere in the United States where the U.S. Nuclear Regulatory Commission maintains jurisdiction for regulating the use of licensed material.

13. The Radiation Safety Officer for activities conducted under this license is Tom W. Cuthbertson.

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14. Licensed material shall be used by, or under the supervision and in the physical presence of, radiographers who have been trained and certified according to the following criteria:
- A. The provisions of 10 CFR 34.31.
  - B. Satisfactory completion of the licensee's training program described in letters dated November 23, 1993 and August 22, 1994, and the Radiation Safety Program Administrative Manual, RSP 1093, Revision 0, dated October 1993 and Revision 1, dated April 1994, and have been designated in writing by the Radiation Safety Officer.

The licensee shall maintain records, at the address specified in item 2 above, of individuals designated as radiographers and their qualifications to perform industrial radiography, for three years after the individual's last use of licensed material.

15. A. Notwithstanding the periodic leak test required by 10 CFR 34.25(b), the requirement does not apply to radiography sources that are stored and not being used. The sources exempted from this test shall be tested for leakage before use or transfer to another person. No sealed source shall be stored for a period of more than 10 years without being tested for leakage and/or contamination.
- B. Sealed sources authorized for a use other than radiography shall be tested for leakage in accordance with 10 CFR 34.25.
16. The licensee shall not acquire licensed material in a sealed source nor device that contains a sealed source unless the source and device have been registered with the Nuclear Regulatory Commission under 10 CFR 32.210 or an Agreement State regulation.
17. The licensee is authorized to receive, possess, and use sealed sources of iridium 192 or cobalt 60 where the radioactivity exceeds the maximum amount of radioactivity specified in this license provided:
- A. Such possession does not exceed the quantity per source specified in Item 8 by more than 20% for iridium 192 or 10% for cobalt 60;
  - B. Records of the licensee show that no more than the maximum amount of radioactivity per source specified in this license was ordered from the supplier or transferor of the byproduct material; and
  - C. The levels of radiation for radiographic exposure devices and storage containers do not exceed those specified in 10 CFR 34.21.



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18. Pursuant to 10 CFR Part 40, "Domestic Licensing of Source Material", the licensee is authorized to possess, use, transfer, and import up to 999 kilograms of uranium contained as shielding material in the radiography exposure devices and source changers authorized by this license.
19. The licensee may transport licensed material in accordance with the provisions of 10 CFR Part 71, "Packaging and Transportation of Radioactive Material".
20. Sealed sources containing licensed material shall not be opened.
21. The licensee may not possess and use materials authorized in Items 6, 7, and 8, until: 1) the licensee has constructed the facilities and obtained the equipment described in the application and supporting documentation; and 2) the U.S. Nuclear Regulatory Commission, Region IV, ATTN: Director, Division of Radiation Safety and Safeguards, has been notified in writing that activities authorized by the license will be initiated.
22. In accordance with the requirements set forth in 10 CFR 30.36(b), the licensee shall promptly notify the U.S. Nuclear Regulatory Commission, Region IV in writing, of a decision not to complete the facility, acquire equipment, or possess and use authorized material.

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23. Except as specifically provided otherwise in this license, the licensee shall conduct its program in accordance with the statements, representations, and procedures contained in the documents including any enclosures, listed below. The Nuclear Regulatory Commission's regulations shall govern unless the statements, representations and procedures in the licensee's application and correspondence are more restrictive than the regulations.
- A. Letter dated April 17, 1992
  - B. Letter with attachments dated November 23, 1993, which incorporated the Radiation Safety Program Administrative and Operation and Emergency Procedures Manuals, RSP 1093, Revision 0.
  - C. Letter dated July 28, 1994
  - D. Letter with attachments dated August 22, 1994, which incorporated the Radiation Safety Program Administrative and Operation and Emergency Procedures Manuals, RSP 1093, Revision 1.

FOR THE U.S. NUCLEAR REGULATORY COMMISSION

Date SEP - 9 1994

By James L. Montgomery  
Materials Branch  
Region IV, WCFO  
Walnut Creek, California 94596