



International Isotopes Inc.

June 25, 2013

ATTN: Document Control Desk
Director, Office of Nuclear Material Safety and Safeguards
U.S. Nuclear Regulatory Commission
One White Flint North
11555 Rockville Pike
Rockville, MD 20852-2738

Subject: Request to Amend License SUB-1587

International Isotopes Inc. (INIS) is no longer conducting research and development activities under U.S. Nuclear Regulatory Commission (NRC) License SUB-1587 and therefore requests to amend the license as follows:

Revise Block 9 to remove Building 1359 from an authorized location for use,

Revise Block 10 to limit authorized activities to possession and storage,

Revise Block 19 to remove the requirement to maintain a site security plan as there are no longer any toxic gases (i.e. GeF₄, BF₃) stored at the facility.

The following attachments are enclosed to support this request:

- Completed Form 313
- Blocks 5 through 11 NRC Form 313
- 1359 Decommissioning Plan dated February 18, 2013
- 1359 Final Status Survey Report dated June 25, 2013

Please contact me at 208.524.5300 or via email at jjmiller@intisoid.com if you have any questions or comments regarding this request.

Sincerely,

John J. Miller, CHP
Radiation Safety Officer
JJM-2013-24
Enclosures as Stated

NMSS 01

Blocks 5 Through 11 NRC Form 313

5. RADIOACTIVE MATERIAL.
 - a. Element and mass number; b. chemical and/or physical form; and c. maximum amount which will be possessed at any one time.
No change requested.

6. PURPOSE(S) FOR WHICH LICENSED MATERIAL WILL BE USED.
Possession and Storage

7. INDIVIDUAL(S) RESPONSIBLE FOR RADIATION SAFETY PROGRAM AND THEIR TRAINING EXPERIENCE.
No change requested

8. TRAINING FOR INDIVIDUALS WORKING IN OR FREQUENTING RESTRICTED AREAS.
No change requested

9. FACILITIES AND EQUIPMENT.
Depleted uranium compounds and equipment contaminated with depleted uranium compounds will be stored at 4137 Commerce Circle Idaho Falls, ID 83401.

10. RADIATION SAFETY PROGRAM.
No change requested

11. WASTE MANAGEMENT.
No change requested

1359 Decommissioning Plan

International Isotopes, Inc.
1359 Commerce Way Facility
NRC License Number SUB-1587

February 18, 2013

| | |
|---|------------------|
| Prepared By: <u>/s/ John Miller</u> | <u>2/18/2013</u> |
| John Miller CHP, Radiation Safety Officer, International Isotopes Inc. | Date |
| Reviewed By: <u>/s/ Carrie Wildman</u> | <u>2/18/2013</u> |
| Carrie Wildman, Project Manager International Isotopes Inc. | Date |
| Reviewed By: <u>/s/ Audrey Nelson</u> | <u>2/18/2013</u> |
| Audrey Nelson, Quality Assurance Manager International Isotopes Inc. | Date |
| Approved By: <u>/s/ Steve Laflin</u> | <u>2/18/2013</u> |
| Steve Laflin, President and C.E.O. International Isotopes Inc. | Date |

1359 Decommissioning Plan

International Isotopes, Inc.
1359 Commerce Way Facility
NRC License Number SUB-1587

February 18, 2013

This 1359 Decommissioning Plan has been developed using guidance provided in NUREG-1575 Multi-Agency Radiation Survey and Site Investigation Manual (MARSSIM) and NUREG-1757, Consolidated Decommissioning Guidance, Volumes 1 & 2.

Decommissioning of the International Isotopes Inc. Building 1359 facility is being conducted to support an Amendment to NRC License SUB-1587, to remove the Building 1359 facility from the license and to revise the license from Possession and Use to Possession and Storage. Depleted uranium and potentially contaminated equipment will be stored at the 4137 Commerce Circle facility warehouse until it is either disposed of as radioactive waste, released for unrestricted use or transferred to another license, such as SUB-1011 for future use.

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1.0 FACILITY BACKGROUND

Building History & Description

The 1359 facility is located in the St. Leon Business Park on the north side of Idaho Falls, Idaho. The building is constructed of expanded polymer block filled with approximately four inches of concrete. International Isotopes Inc. acquired the facility in February 2004. Prior to acquisition the facility was occupied by Alliance Contractors, a vinyl siding and window distributor. There is no reason to believe radioactive materials were introduced into this facility by the prior occupants.

The 1359 facility is equipped with its own septic system that currently serves the restrooms and floor drains located in the restrooms and utility closet.

The facility is approximately 80 feet wide by 100 feet deep. Room numbers and functions are listed in the table below. Refer to the facility diagram enclosed with this plan.

| Room | Function |
|------|---|
| 101 | Reception Area |
| 102 | Utility Hall Way |
| 102A | Utility Closet |
| 102B | Men's Restroom |
| 102C | Women's Restroom |
| 201 | Second Floor Conference Room |
| 301 | Gas Production Skid |
| 302 | Analytical Laboratory |
| 303 | Count Room |
| 304 | Powder Handling (UF ₄ , U ₃ O ₈ , GeO ₂ , B ₂ O ₃) |
| 401 | Process Floor Mezzanine |
| 402 | Count Room/DU Handling Room Mezzanine |

Interior walls of the production area are constructed of steel siding. The production area floors are constructed of sealed concrete. There are no floor drains associated with the production area. Approximately 350 linear feet of ventilation ducting exists in the facility, only a small run of ducting has the potential for radiological contamination. Approximately 90% of the gas production system is located on a skid, which can be removed from the facility utilizing a fork lift.

The following list describes the major pieces of equipment that have been used in the radiological work and fluorine gas production processes equipment.

DUF₄/DUOxide Stainless Steel Glove Box: A stainless steel glove box had been used to transfer batches of UF₄ into the reaction tray. This glove box was used very infrequently because small batch sizes did not require the use of the glove box.

DUF₄/DUOxide Plexiglas Glove Box: A small Plexiglas glove box has been utilized to transfer batches of UF₄ into the reaction tray. Low levels of residual depleted uranium are expected to be present in this glove box.

DUF₄/DUOxide Fume Hood: A small Plexiglas fume hood has been utilized to perform visual inspections of the reacted depleted uranium and GeO₂ or B₂O₃ following a batch run. Low levels of residual depleted uranium are expected to be present in this fume hood.

Gas Production Fume Hood: A fume hood approximately, 12 ft wide by 6 ft deep and 9 feet in height has been used to house the fluorine gas extraction system. This fume hood has not become contaminated during operations. This fume hood is located in Room 301 Gas Production and is not expected to contain any residual radioactive materials.

ICP-MS Fume Hood: A fume hood approximately, 12 ft wide by 6 ft deep and 9 feet in height will be used to house the Perkin Elmer ICP-MS system. This fume hood has not become contaminated during operations. This fume hood is located in Room 302 Analytical Laboratory and is not expected to contain any residual radioactive materials.

Perkin Elmer ICP-MS: The Perkin Elmer ICP-MS is an automated trace element gas/liquid sampling system. The system is currently utilized to determine the impurity concentrations at the parts per trillion level of fluorine gas products. This unit is located in Room 302, Analytical Laboratory and has not become contaminated during operations.

Operational History

The facility operated in a research and development (R&D) mode from January 2006 until January 2013. Between January 23, 2006 and November 25, 2008 a total of 57 test runs using DUF₄ and GeO₂ to produce GeF₄ were completed. A total of 41.896 kg of DUF₄ was utilized in the GeF₄ production studies. The largest batch size consisted of 2.67 kg of DUF₄.

Given the small quantities of uranium needed for the studies license SUB-1587 was amended in July 2007 to limit the total quantity of depleted uranium in the 1359 facility to 25 kg and to move storage of DUF₄ to the 4137 Warehouse. A modular room was erected in the 4137 Warehouse to house the DU Drum fume hood to support the 25 kg batch restriction to the 1359 facility. The modular room and equipment remain in place and are outside the scope of this decommissioning effort. R&D activities were curtailed between December 2008 and July 2010 to re-configure the gas production and collection system to support studies on the production and collection of BF₃. After configuration a total of 26 test runs were conducted commencing on July 12, 2010 and ending with the last run on December 12, 2012.

A total of 11.368 kg of DUF₄ was utilized in the BF₃ production studies. In total, the R&D activities conducted at the 1359 facility under SUB-1587 utilized 53.264 kg of DUF₄, refer to the table below.

Test Runs with GeO₂

| Date | UF ₄ (grams) | Date | UF ₄ (grams) | Date | UF ₄ (grams) |
|------------|----------------------------|------------|----------------------------|------------|----------------------------|
| 1/23/2006 | 135 | 3/12/2007 | 211 | 1/31/2008 | 211 |
| 5/15/2006 | 135 | 4/23/2007 | 212 | 2/4/2008 | 211 |
| 5/17/2006 | 135 | 5/2/2007 | 211 | 2/6/2008 | 212 |
| 6/21/2006 | 135 | 5/4/2007 | 211 | 3/11/2008 | 633 |
| 6/30/2006 | 801.3 | 5/9/2007 | 211 | 3/17/2008 | 638 |
| 7/20/2006 | 685 | 5/18/2007 | 211 | 3/19/2008 | 1329 |
| 7/26/2006 | 135 | 5/29/2007 | 213 | 3/27/2008 | 1330 |
| 8/1/2006 | 135 | 6/1/2007 | 213 | 4/7/2008 | 1334 |
| 8/3/2006 | 180 | 6/5/2007 | 211 | 4/10/2008 | 1367 |
| 11/17/2006 | 211.2 | 6/7/2007 | 222 | 4/14/2008 | 2658 |
| 11/22/2006 | 213 | 6/12/2007 | 211 | 4/16/2008 | 2660 |
| 11/28/2006 | 212 | 6/15/2007 | 211 | 4/18/2008 | 2660 |
| 11/30/2006 | 212 | 6/19/2007 | 211 | 6/19/2008 | 2660 |
| 12/5/2006 | 211 | 8/8/2007 | 211 | 6/26/2008 | 2263 |
| 12/7/2006 | 213 | 8/10/2007 | 211 | 6/27/2008 | 2532 |
| 12/15/2006 | 215 | 8/27/2007 | 211 | 6/30/2008 | 2670 |
| 12/19/2006 | 211 | 8/29/2007 | 209 | 8/29/2008 | 493.7 |
| Total 2006 | 4174.5 | 10/1/2007 | 211 | 9/10/2008 | 1225.9 |
| | | 10/2/2007 | 211 | 10/6/2008 | 1639.1 |
| | | Total 2007 | 4023 | 11/21/2008 | 2260 |
| | | | | 11/25/2008 | 2712 |
| | | | | Total 2008 | 33698.7 |

Test Runs with B₂O₃

| Date | UF ₄ (grams) | Date | UF ₄ (grams) | Date | UF ₄ (grams) |
|------------|----------------------------|------------|----------------------------|------------|----------------------------|
| 7/12/2010 | 346 | 2/14/2011 | 386 | 6/12/2012 | 375 |
| 7/15/2010 | 380 | 5/26/2011 | 1854 | 6/20/2012 | 382 |
| 7/19/2010 | 386 | 9/30/2011 | 372 | 6/26/2012 | 380 |
| 9/23/2010 | 391 | 10/12/2011 | 376 | 7/16/2012 | 380 |
| 10/20/2010 | 386 | 10/18/2011 | 382 | 7/24/2012 | 380 |
| 11/15/2010 | 387 | Total 2011 | 3370 | 9/4/2012 | 382 |
| 11/18/2010 | 388 | | | 9/25/2012 | 382 |
| 12/15/2010 | 386 | | | 10/23/2012 | 382 |
| Total 2010 | 3050 | | | 11/13/2012 | 384 |
| | | | | 11/17/2012 | 384 |
| | | | | 11/29/2012 | 381 |
| | | | | 12/5/2012 | 384 |
| | | | | 12/12/2012 | 372 |
| | | | | Total 2012 | 4948 |

During this period of operation depleted uranium compounds were only handled in glove boxes or fume hoods. During this time routine radiological surveys were conducted throughout the facility. Contamination was never identified outside of glove boxes or fume hoods used to handle depleted uranium compounds. Uranium contamination was never identified in the gas collection manifold outside of the reaction vessel or in the fluorine gas product and there was never any spill involving depleted uranium compounds.

Individual's that worked at the 1359 facility were monitored for whole body and extremity exposures, dosimeters were exchanged on a quarterly basis. During this period of operations the highest whole body dose recorded was 14 mrem in one quarter. This was the only instance when a whole body dose exceeding the 10 mrem detection limit of the dosimeter was recorded.

Routine bioassay via urinalysis had been conducted as a precautionary measure from January 2006 until December 2008. The results of these bioassays and continuous air monitoring and grab air sampling indicated that the engineering controls implemented prevented the release of uranium contamination in the work place and subsequent uptakes and routine bioassays were curtailed.

2.0 DECOMMISSIONING PLAN

The scope of this decommissioning activity is to release Building 1359 for unrestricted use in order to support an amendment to NRC license SUB-1587 that removes the Building 1359 facility from the license and revises the authorized licensed activities to possession and storage.

Consistent with NUREG-1757 Volume 2; Building 1359 facility is categorized as Decommissioning Group 2 based on the operational history of the facility and results of routine contamination and airborne radioactive surveys performed during operations and extended periods of shut-down.

Decommissioning of the 1359 Building is sub-divided into the following tasks:

1. Planning and Preparation
2. Facility Characterization
3. Decontamination/Dismantling
4. Packaging
5. Radioactive Material Disposition
6. Final Status Survey and Evaluation

2.1 PLANNING AND PREPARATION

The planning and preparation phase of this decommissioning activity consists of developing a task sequence and schedule, identifying and acquiring as necessary the equipment needed to complete the project, ensuring this equipment is available, calibrated as needed, and operable, identifying disposition path for items to be removed from the facility including the identification of storage areas, identifying release requirements for items to be left behind in the facility.

Background survey measurements were conducted on the concrete floor of the Utility Room (Room 102A) and along the concrete slab along the north and south roll-up doors; these areas are considered non-impacted.

Instrumentation utilized during the R&D activities will be utilized during the decommissioning process, these instruments are identified below:

| Instrument | Serial Number | Calibration Due Date |
|--|---------------|----------------------|
| Ludlum 3030 | 210766 | 07/18/2013 |
| Ludlum 3030 | 210769 | 02/16/2013 |
| Ludlum 2929 w/ 43-01 probe | 236413/255983 | 11/07/2013 |
| Ludlum 2929 w/ 43-01 probe | 202409/221513 | 09/04/2013 |
| Ludlum 2360 w/ 43-93 probe | 202409/221513 | 07/08/2013 |
| Note that Eberline Alpha 7A continuous air monitors as well as Ortec Alpha Spectroscopy are available but are not expected to be required given the levels of residual contamination in the fume hood and glove boxes. | | |

A disposition log will be maintained for equipment and components that are removed from the facility that may have been in contact with uncontained uranium. The disposition log will identify the piece of equipment by name and serial number (as applicable), a brief description of the equipment, and type of disposition, i.e. storage for future use, storage for subsequent disposal as radioactive material, or unrestricted release. Items that have been released for unrestricted use will include a survey indicating it has been surveyed and shown to be free of residual radioactivity.

The Decommissioning Schedule is provided below; tasks may be completed in parallel.

| Task | Estimated Duration |
|--|--------------------|
| Develop Decommissioning Plan | 2 week |
| Review operating history and radiological surveys to identify items and areas with the potential for containing residual radioactive materials | 1 week |
| Identify items to be removed from facility and categorize as having potential or having no potential for containing residual radioactive materials | 3 days |
| Remove items having no potential for containing residual radioactive materials from the facility | 3 weeks |
| Remove items having a potential for containing residual radioactive materials that will be stored for future use or radioactive material disposal from the facility. | 1 week |
| Survey for release and remove items having a potential for containing residual radioactive materials that will be released for unrestricted use from the facility. | 1 week |
| Survey facility in accordance with the Final Status Survey Plan | 3 weeks |

2.2 FACILITY CHARACTERIZATION

Facility characterization will be performed following the guidance provided in NUREG-1575, *Multi-Agency Radiation Survey and Site Investigation Manual*, (MARSSIM). Characterization typically consists of; historical site assessment followed by scoping and characterizations surveys, and remedial action surveys if necessary. Considering INIS has been the sole occupant to utilize radioactive materials at the 1359, characterization will be conducted through a review of the routine surveys performed at the facility, which include weekly, monthly and quarterly contamination surveys air sampling data. These surveys have been documented and maintained at the facility since the introduction of depleted uranium. It is important to note that during the course of depleted uranium operations the presence of uranium was never observed in any continuous air monitoring samples, in-line ventilation air samples, work coverage grab samples or in the fluorine gas production stream; and that contamination was never identified on building surfaces. The following definitions from the MARSSIM are included for clarity:

Class 1 area: An *area* that is projected to require a *Class 1 final status survey*.

Class 1 survey: A type of *final status survey* that applies to *areas* with the highest potential for contamination, and meet the following criteria: (1) *impacted*; (2) potential for delivering a dose above the *release criterion*; (3) potential for small *areas of elevated activity*; and (4) insufficient evidence to support reclassification as *Class 2* or *Class 3*.

Class 2 area: An *area* that is projected to require a *Class 2 final status survey*.

Class 2 survey: A type of *final status survey* that applies to *areas* that meet the following criteria: (1) *impacted*; (2) low potential for delivering a dose above the *release criterion*; and (3) little or no potential for small *areas of elevated activity*.

Class 3 area: An *area* that is projected to require a *Class 3 final status survey*.

Class 3 survey: A type of *final status survey* that applies to *areas* that meet the following criteria: (1) *impacted*; (2) little or no potential for delivering a dose above the *release criterion*; and (3) little or no potential for small *areas of elevated activity*.

Impacted area: Any *area* that is not *classified* as *non-impacted*. Areas with a possibility of containing *residual radioactivity* in excess of natural background or fallout levels.

Non-impacted area: Areas where there is no reasonable possibility (extremely low probability) of residual contamination.

Based on the operational history of the facility there are no Class 1 areas identified in the Building 1359 facility. Radioactive contamination is expected in the ventilation duct that serviced the fume hood and glove boxes located in Room 304. The portion of ducting affected is the run between Room 304 and the in line HEPA filters. This portion of ducting will be removed from the facility and disposed of as radioactive waste, in whole or in part. In-line air monitoring during operations downstream of the HEPA filters never identified the presence of uranium.

The facility areas have been classified based on the routine survey data and operational history. Area classifications are provided in the table below.

| Area Description | Floor | Walls (≤ 8 ft) | Ceilings/Walls (> 8 ft.) |
|---|-----------------|-------------------|-----------------------------|
| Reception Area Room 101 | Class 3 | Non-impacted | Non-impacted |
| Hallway 102 | Class 3 | Non-impacted | Non-impacted |
| Utility Room 102A | Non-impacted | Non-impacted | Non-impacted |
| Restrooms Rooms 102B & 102C | Class 3 | Non-impacted | Non-impacted |
| 2 nd Floor Conference Room 201 | Non-impacted | Non-impacted | Non-impacted |
| Gas Production Room 301 | Class 3 | Non-impacted | Non-impacted |
| Analytical Laboratory Room 302 | Class 3 | Non-impacted | Non-impacted |
| Count Room 303 | Class 2 | Class 3 | Non-impacted |
| DU Handling Room 304 | Class 2 | Class 3 | Non-impacted |
| Remainder of Process Area | Class 3 | Non-impacted | Non-impacted |
| 401 Process floor Mezzanine | Class 3 | N/A | Non-impacted |
| 402 Count Room/DU Handling Room Mezzanine | Class 3 | Non-impacted | Non-impacted |
| Building Exterior | Non-impacted | Non-impacted | Non-impacted |
| | | | |
| | Upstream Filter | Downstream Filter | |
| Room 304 Ventilation ⁽¹⁾ | Class 1 | Non-impacted | |
| Fluorine Gas Production Manifold ⁽²⁾ | Class 3 | Non-impacted | |
| Notes: (1) HEPA Filter, (2) Metal Micron Filter | | | |

2.3 DECONTAMINATION/ DISMANTLING

Decontamination and dismantling efforts are expected to be minimal. The following supports the basis for this assumption.

- a. Prior to licensed operations, the building surfaces in the areas where radioactive materials were handled and stored have been sealed in an effort to prevent the migration of radioactive contamination into the building materials as a result of a radioactive spill or through process activities.
- b. The interior walls in the production areas are constructed of steel siding or drywall with the original painted surface (prior to license operations) exposed.
- c. There are no floor drains and minimal ventilation ductwork in the production area.
- d. The fluorine extraction process was a dry process; depleted uranium was never handled as a liquid.

- e. There was never a spill of material containing depleted uranium compounds; contamination was never identified during routine facility surveys outside of the fume hoods or glove boxes located in Room 304.
- f. Handling of uncontained depleted uranium was only performed in HEPA filtered fume hoods or glove boxes.
- g. Air sample, including in-line air samples, grab air samples and continuous air monitoring samples never detected the presence of uranium.
- h. The short operating history, small quantity of depleted uranium processed, work control procedures and engineering controls prevented the build-up of radioactive contamination within the structure.
- i. The gas production system was never contaminated downstream of the in-line gas particulate filter, uranium was never detected in the fluorine gas product.

Minimal radiological controls, i.e. housekeeping, work in progress surveys and PPE (lab coat and gloves) will be implemented during decontamination/disassembly activities.

2.4 PACKAGING

Packaging of material will be conducted as follows:

Any DUF₄ remaining in the facility will be weighed (if weight is not known), packaged in PVC bag and placed in 1 gallon tin can(s) prior to being transferred to the 4137 warehouse. All other depleted uranium compounds (oxides and oxide/fluoride mixes) will be weighed (if weight is unknown) packaged in PVC bag and placed in a 1 gallon tin can and placed into radioactive waste storage at the 4137 warehouse.

Compactable waste, such as lab trash, swipes and PPE, will be consolidated in double PVC bags for subsequent compaction at the 4137 facility.

Potentially contaminated equipment that will be stored for future use will be decontaminated as necessary to ensure that external surfaces are free of residual contamination. The equipment will be sealed, as needed, to prevent internal contamination from migrating out of the equipment.

Potentially contaminated equipment that will be stored for subsequent disposal as radioactive waste will be packaged in a manner to prevent the spread of contamination. In lieu of packaging, equipment with only internally contaminated surfaces may be sealed to prevent internal contamination from migrating out of the equipment.

When possible, the internal void space of contaminated equipment that is destined for subsequent disposal will be utilized as disposal volume for other contaminated or potentially contaminated items. For example, a length of ventilation duct that is destined for disposal may be filled with other potentially contaminated items destined for disposal.

2.5 RADIOACTIVE MATERIAL DISPOSITION

Radioactive active materials, including contaminated equipment will initially be transferred from the 1359 facility to the 4137 warehouse waste where it will be placed into storage until final disposition.

Unreacted DUF₄ will be placed back into the remaining DUF₄ inventory currently stored in the 4137 warehouse. Some, or all, of this inventory will either be transferred to International Isotopes Inc. NRC License SUB-1011 once the facility has been constructed or it will be disposed of at US Ecology's Richland, Washington waste disposal facility.

Reacted depleted uranium compounds will be transferred to the 4137 warehouse and placed into radioactive waste storage to be disposed of at US Ecology's Richland, Washington waste disposal facility during the next waste disposal campaign.

Compactable radioactive waste collected from or generated during the decommissioning of the 1359 facility will be added to the reactor produced compactable waste stream to be compacted and subsequently disposed of at US Ecology's Richland, Washington waste disposal facility during the next waste disposal campaign.

Contaminated or potentially contaminated equipment/components that have no residual value will be packaged as described in section 2.4 above. These items will be identified on Form F-336 *Potentially Contaminated Equipment Disposition Log* and then transferred to the 4137 warehouse for storage and subsequently disposed of at US Ecology's Richland, Washington waste disposal facility during the next waste disposal campaign.

Contaminated or potentially contaminated equipment/components that have residual value will be packaged as described in section 2.4 above. These items will be identified on Form F-336 *Potentially Contaminated Equipment Disposition Log* and then transferred to the 4137 warehouse for storage and subsequent reuse or resale. Potentially contaminated equipment/components may be reused as is, if transferred to an authorized licensee. Potentially contaminated equipment/components would require decontamination prior to release for unrestricted use.

Uncontaminated equipment/components of residual value that will be removed from the facility will be placed into appropriate storage containers/locations until final disposition.

2.6 FINAL STATUS SURVEY AND EVALUATION

Final status surveys will be performed in accordance with the MARSSIM. Final status surveys will consist of direct and removable contamination surveys conducted in the Class 2 and Class 3 areas identified in the building, note that there are no Class 1 areas located in Building 1359. Surveys exterior to the building as well as soil and building media samples, i.e. paint, piping insulation, or concrete are not considered to be necessary given the operating history of the facility and the physical and chemical form of the depleted uranium compounds handled during the brief operating history of the facility.

The Building 1359 facility has been divided into 8 survey units as follows:

| Floor | | Walls (≤ 8 ft) | Ceilings/Walls (> 8 ft.) |
|---|--|--|---|
| Survey Unit #1 | | | |
| Stair way Conference Room 201 | Random scan of area, Direct survey followed by swipe at highest scan location in each room | No survey | No Survey |
| Survey Unit #2 | | | |
| Reception Area Room 101 Hallway 102 Restrooms 102B & 102C | Scan 5% of area, Direct survey followed by swipe at 5 highest scan locations in each room | No survey | No Survey |
| Survey Unit #3 | | | |
| Gas Production Room 301 Analytical Lab Room 302 | Scan 5% of area, Direct survey followed by swipe at 5 highest scan locations in each room | No survey | No Survey |
| Survey Unit #4 | | | |
| 401 Mezzanine 402 Mezzanine | Scan 5% of area, Direct survey followed by swipe at 5 highest scan locations in each area | No survey | No Survey |
| Survey Unit #5 | | | |
| SE Quarter of Process Area SW Quarter of Process Area | Scan 5% of high traffic area and random scan remainder Direct survey 5 followed by swipe at highest scan locations in each quadrant | No survey | No Survey |
| Survey Unit #6 | | | |
| NE Quarter of Process Area NW Quarter of Process Area | Scan 5% of high traffic area and random scan remainder Direct survey followed by swipe at 5 highest scan locations in each quadrant | No survey | No Survey |
| Survey Unit #7 | | | |
| DU Handling Room 304 | Scan 25% of area. Direct survey followed by swipe at 10 highest scan locations | Scan 5% of area Direct survey, 2 highest scan locations each wall | Scan 100% of ceiling in 6 inch width along circumference of duct penetration Direct survey highest scan location |
| Survey Unit #8 (To be surveyed after all other Final Status Surveys have been conducted and evaluated) | | | |
| Count Room 303 | Scan 25% of area. Direct survey followed by swipe at 5 highest scan locations | Scan 5% of area Direct survey highest scan location each wall | No survey |

Surveys will be documented on Forms F-33A Radiological Survey Report and F33-B, Radiological Survey Report Map.

Final Status Survey results will be evaluated against a screening dose model in accordance with Appendix H of NUREG-1757, Vol. 2. An average Derived Concentration Guideline Level (DCGL_w) for the survey unit of 235 dpm/100 cm² was derived using the US Nuclear Regulatory Commission's DandD Code, Version 2.1.0

resulting in a TEDE = 2.16E+01 mRem (with 95% CI of 1.92E+01 to 2.45E+01 mRem) using the default Building Occupancy parameters.

A reference area background for scan and direct survey measurements was developed by obtaining 20 direct survey measurements utilizing the Ludlum Model 2360 with Model 43-93 probe. A mean background of 10.95 cpm/100cm² with a standard deviation of 2.96 cpm/100cm² (54.75 dpm/100cm² with a standard deviation of 14.28 dpm/100cm²) was determined for the concrete floor surfaces. The minimum detectable activity for a static 1 minute measurement was calculated as 91.98 dpm/100 cm², 39.1% of the DCGL_r and within the recommended 50% MDA:DCGL ratio. The MDA equation is provided below:

$$MDA = \frac{3 + 3.29 \sqrt{RbTs \left(1 + \frac{T_s}{T_b}\right)}}{eff_1 \times T_s \times \frac{\text{Probe Area (cm}^2\text{)}}{100}}$$

Where: Rb = Background countrate (10.95 cpm)
Ts = Sample count time (1 minute)
Tb = Background count time (1 minute)
eff₁ = Insturment efficeiciency (20%)

Assuming a human performance efficiency of 50% and a scan rate of 5 inches/second, a scanning MDA of 881 dpm/100cm² would be observed. During the scan it is assumed that the radiological technician would pause for a period of 10 seconds above an area that exhibited elevated count rates. The scanning MDA during the pause period is calculated at 185 dpm/100cm². The Scanning MDA equation is provided below:

$$MDA_{scan} = \frac{3.29 \times \left[\sqrt{\frac{Rb \times i}{60}} \times \frac{60}{i} \right]}{eff_1 \times eff_s \times \frac{\text{Probe Area (cm}^2\text{)}}{100}}$$

Where: Rb = Background countrate (10.95 cpm)
i = Observation interval during scan (0.44 seconds)
p = Performance efficeiciency (50%)
eff₁ = Insturment efficeiciency (20%)
Eff_s = Surface efficeiciency (100%)

Note: The MDA scan equation during the 10 second pause period is the same as above, where i = 10 seconds.

3.0 REFERENCES

- [1] NUREG-1575, *Multi-Agency Radiation Survey and Site Investigation Manual*, Washington D.C: Nuclear Regulatory Commission, December 1997
- [2] NUREG-1757, *Consolidated Decommissioning Guidance*, Volumes 1 & 2 Washington D.C: Nuclear Regulatory Commission, September 2006
- [3] US Nuclear Regulatory Commission DandD Version 2.1.0
- [4] ORNL-6913, *Total Effective Dose Equivalent Associated with Fixed Uranium Surface Contamination*, Oak Ridge National Laboratory, Oak Ridge TN, April 1997

Figure 1. International Isotope Inc. FEP First Floor

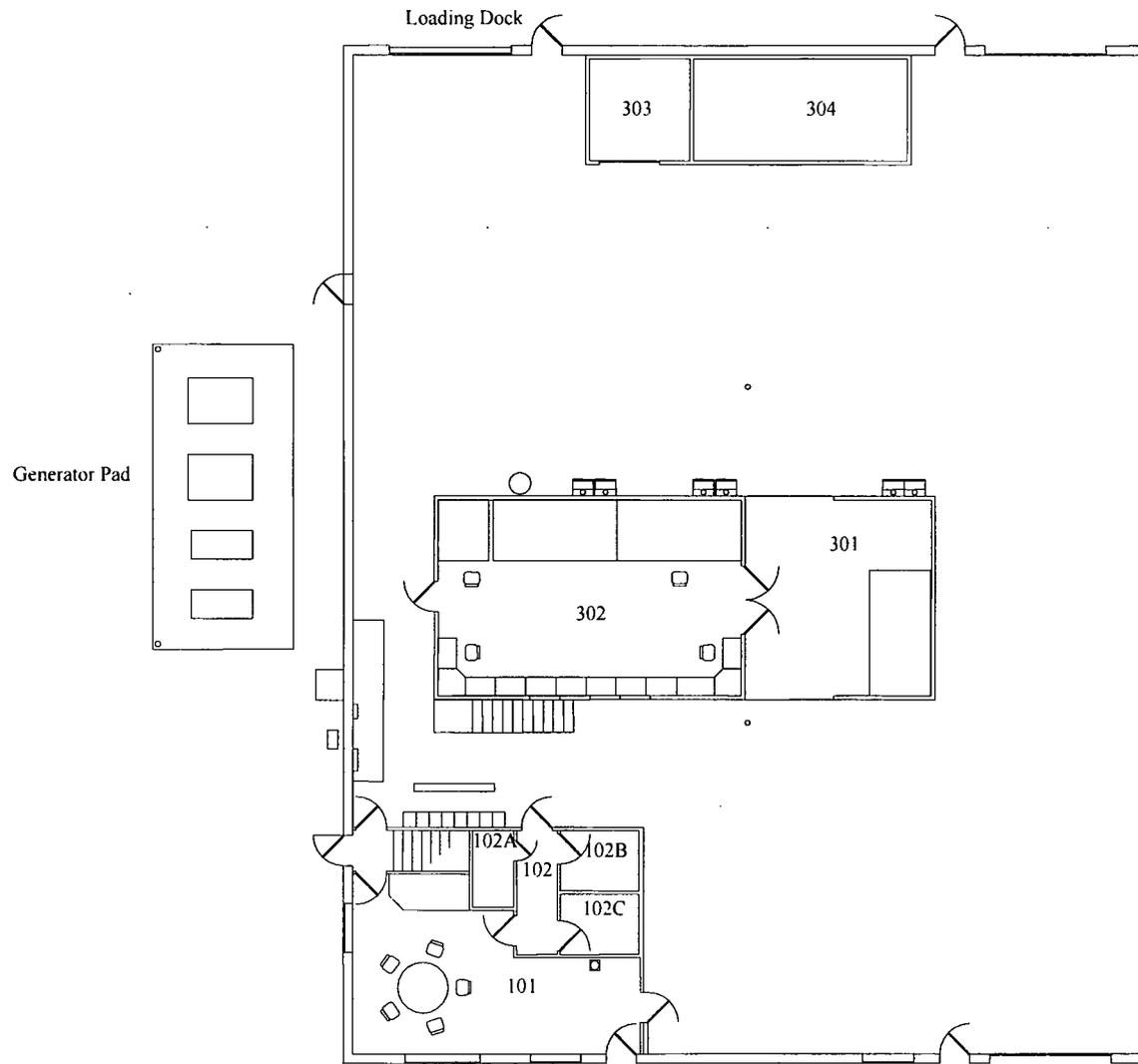
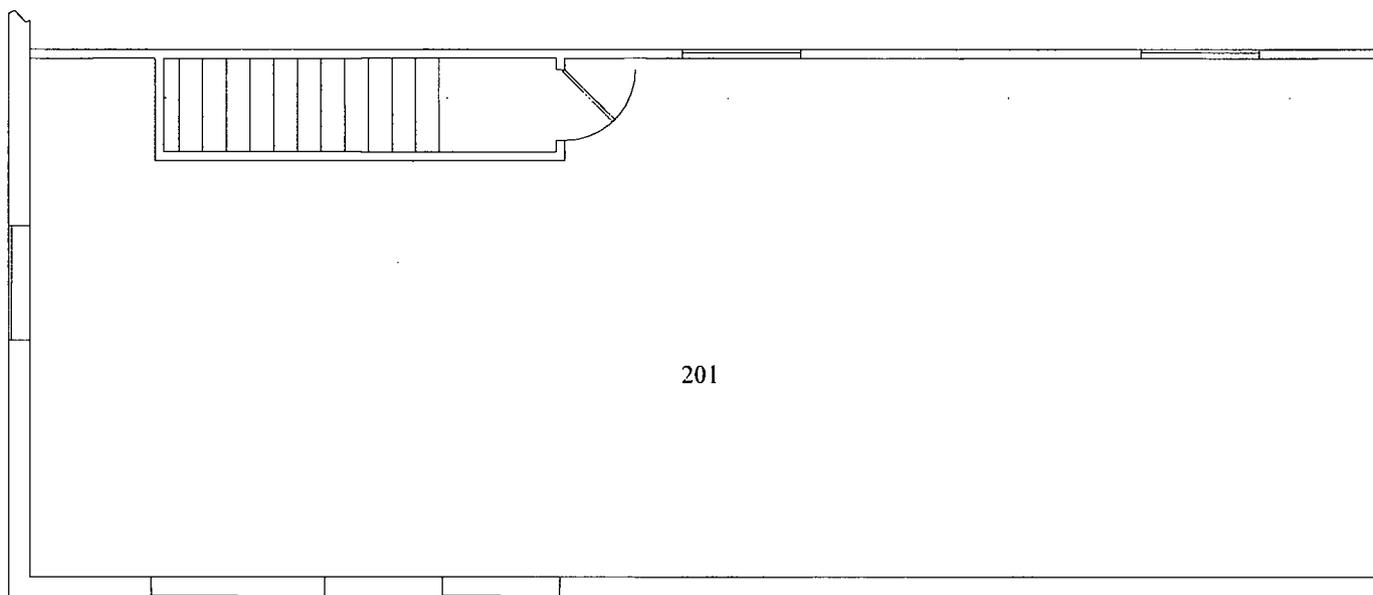


Figure 2. International Isotope Inc. FEP Second Floor



1359 Final Status Survey Report

International Isotopes, Inc.
1359 Commerce Way Facility
NRC License Number SUB-1587

June 25, 2013

| | |
|---|------------------|
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| John Miller CHP, Radiation Safety Officer, International Isotopes Inc. | Date |
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| Audrey Nelson, Quality Assurance Manager International Isotopes Inc. | Date |
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| Steve Laflin, President and C.E.O. International Isotopes Inc. | Date |

1359 Final Status Survey Report

International Isotopes, Inc.
1359 Commerce Way Facility
NRC License Number SUB-1587

June 25, 2013

This 1359 Final Status Survey Report summarizes the results of the final status surveys conducted in Building 1359 following the removal of all depleted uranium and potentially contaminated equipment and components. Depleted uranium and potentially contaminated equipment will be stored at the 4137 Commerce Circle facility warehouse until it is either disposed of as radioactive waste, released for unrestricted use, or transferred to another license, such as SUB-1011 for future use.

The Building 1359 was subdivided into 8 survey units as described in the 1359 Decommissioning Plan and surveyed in accordance with International Isotopes Inc. procedure OP-RSP-010, Facility Radiological Surveys. The results of these surveys demonstrate Building 1359 is free of residual radioactive material and can be released for unrestricted use and can be removed from US NRC license SUB-1587.

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1.0 FACILITY BACKGROUND

Building History & Description

The 1359 facility is located in the St. Leon Business Park on the north side of Idaho Falls, Idaho. The building is constructed of expanded polymer block filled with approximately four inches of concrete. International Isotopes Inc. (INIS) became the sole leasing tenant (lease) of the facility in February 2004. Prior to the INIS lease the facility was occupied by Alliance Contractors, a vinyl siding and window distributor. There is no reason to believe radioactive materials were introduced into this facility by the prior occupant and this was the sole occupant prior to INIS's lease.

The 1359 facility is equipped with its own septic system that currently serves the restrooms and floor drains located in the restrooms and utility closet. There are no floor drains in the remainder of the building.

The facility is approximately 80 feet wide by 100 feet deep. Room numbers and functions are listed in the table below. Refer to the facility diagram enclosed with this plan.

| Room | Function |
|------|---|
| 101 | Reception Area |
| 102 | Utility Hall Way |
| 102A | Utility Closet |
| 102B | Men's Restroom |
| 102C | Women's Restroom |
| 201 | Second Floor Conference Room |
| 301 | Gas Production Skid |
| 302 | Analytical Laboratory |
| 303 | Count Room |
| 304 | Powder Handling (UF ₄ , U ₃ O ₈ , GeO ₂ , B ₂ O ₃) |
| 401 | Process Floor Mezzanine |
| 402 | Count Room/DU Handling Room Mezzanine |

Interior walls of the production area are constructed of steel siding. The production area floors are constructed of sealed concrete. There are no floor drains associated with the production area. Approximately 350 linear feet of ventilation ducting exists in the facility, only a small run of ventilation ducting has the potential for radiological contamination since it is upstream of an installed HEPA filter. Approximately 90% of the gas production system is located on a skid, that was contained within an enclosed ventilation controlled cabinet, and which can be removed from the facility utilizing a fork lift.

The following list describes the major pieces of equipment that have been used in the radiological work and fluorine gas production processes equipment.

DUF₄/DUOxide Stainless Steel Glove Box: A stainless steel glove box had been used to transfer batches of UF₄ into the reaction tray. This glove box was used very infrequently because small batch sizes did not require the use of the glove box. The glove box was removed from Building 1359 and is currently stored in the 4137 Warehouse.

DUF₄/DUOxide Plexiglas Glove Box: A small Plexiglas glove box has been utilized to transfer batches of UF₄ into the reaction tray. Low levels of residual depleted uranium are expected to be present in this glove box. The glove box was removed from Building 1359 and is currently stored in the 4137 Warehouse.

DUF₄/DUOxide Fume Hood: A small Plexiglas fume hood has been utilized to perform visual inspections of the reacted depleted uranium and GeO₂ or B₂O₃ following a batch run. Low levels of residual depleted uranium are expected to be present in this fume hood. The glove box was removed from Building 1359 and is currently stored in the 4137 Warehouse.

Gas Production Fume Hood: A fume hood approximately, 12 feet wide by 6 feet deep and 9 feet in height has been used to house the fluorine gas extraction system. This fume hood has not become contaminated during operations. This fume hood was disassembled and moved to the 4137 Warehouse for storage.

ICP-MS Fume Hood: A fume hood approximately, 12 feet wide by 6 feet deep and 9 feet in height was used to house the Perkin Elmer ICP-MS system. This fume hood has not become contaminated during operations. This fume hood was disassembled and moved to the 4137 Warehouse for storage.

Perkin Elmer ICP-MS: The Perkin Elmer ICP-MS is an automated trace element gas/liquid sampling system. The system was utilized to determine the impurity concentrations at the parts per trillion level of fluorine gas products. This unit was located in Room 302, Analytical Laboratory and has not become contaminated during operations. This piece of equipment was moved to the 4137 Warehouse for storage.

A list of other equipment removed from the 1359 facility is provided on the equipment disposition log, along with a copy of the radiological surveys supporting removal are included in this report. Original radiological surveys are maintained on file at the 4137 facility.

Operational History

The facility operated in a research and development (R&D) mode from January 2006 until January 2013. Between January 23, 2006 and November 25, 2008 a total of 57 test runs using DUF₄ and GeO₂ to produce GeF₄ were completed. A total of 41.896 kg of DUF₄ was utilized in the GeF₄ production studies. The largest batch size consisted of 2.67 kg of DUF₄.

R&D activities were curtailed between December 2008 and July 2010 to re-configure the gas production and collection system to support studies on the production and collection of BF₃.

After configuration a total of 26 test runs were conducted commencing on July 12, 2010 and ending with the last run on December 12, 2012. A total of 11.368 kg of DUF₄ was utilized in the BF₃ production studies. In total, the R&D activities conducted at the 1359 facility under SUB-1587 utilized 53.264 kg of DUF₄, refer to the table below.

| Test Runs with GeO ₂ | | | | | |
|---------------------------------|----------------------------|------------|----------------------------|------------|----------------------------|
| Date | UF ₄ (grams) | Date | UF ₄ (grams) | Date | UF ₄ (grams) |
| 1/23/2006 | 135 | 3/12/2007 | 211 | 1/31/2008 | 211 |
| 5/15/2006 | 135 | 4/23/2007 | 212 | 2/4/2008 | 211 |
| 5/17/2006 | 135 | 5/2/2007 | 211 | 2/6/2008 | 212 |
| 6/21/2006 | 135 | 5/4/2007 | 211 | 3/11/2008 | 633 |
| 6/30/2006 | 801.3 | 5/9/2007 | 211 | 3/17/2008 | 638 |
| 7/20/2006 | 685 | 5/18/2007 | 211 | 3/19/2008 | 1329 |
| 7/26/2006 | 135 | 5/29/2007 | 213 | 3/27/2008 | 1330 |
| 8/1/2006 | 135 | 6/1/2007 | 213 | 4/7/2008 | 1334 |
| 8/3/2006 | 180 | 6/5/2007 | 211 | 4/10/2008 | 1367 |
| 11/17/2006 | 211.2 | 6/7/2007 | 222 | 4/14/2008 | 2658 |
| 11/22/2006 | 213 | 6/12/2007 | 211 | 4/16/2008 | 2660 |
| 11/28/2006 | 212 | 6/15/2007 | 211 | 4/18/2008 | 2660 |
| 11/30/2006 | 212 | 6/19/2007 | 211 | 6/19/2008 | 2660 |
| 12/5/2006 | 211 | 8/8/2007 | 211 | 6/26/2008 | 2263 |
| 12/7/2006 | 213 | 8/10/2007 | 211 | 6/27/2008 | 2532 |
| 12/15/2006 | 215 | 8/27/2007 | 211 | 6/30/2008 | 2670 |
| 12/19/2006 | 211 | 8/29/2007 | 209 | 8/29/2008 | 493.7 |
| Total 2006 | 4174.5 | 10/1/2007 | 211 | 9/10/2008 | 1225.9 |
| | | 10/2/2007 | 211 | 10/6/2008 | 1639.1 |
| | | Total 2007 | 4023 | 11/21/2008 | 2260 |
| | | | | 11/25/2008 | 2712 |
| | | | | Total 2008 | 33698.7 |

Test Runs with B₂O₃

| Date | UF ₄ (grams) | Date | UF ₄ (grams) | Date | UF ₄ (grams) |
|------------|----------------------------|------------|----------------------------|------------|----------------------------|
| 7/12/2010 | 346 | 2/14/2011 | 386 | 6/12/2012 | 375 |
| 7/15/2010 | 380 | 5/26/2011 | 1854 | 6/20/2012 | 382 |
| 7/19/2010 | 386 | 9/30/2011 | 372 | 6/26/2012 | 380 |
| 9/23/2010 | 391 | 10/12/2011 | 376 | 7/16/2012 | 380 |
| 10/20/2010 | 386 | 10/18/2011 | 382 | 7/24/2012 | 380 |
| 11/15/2010 | 387 | Total 2011 | 3370 | 9/4/2012 | 382 |
| 11/18/2010 | 388 | | | 9/25/2012 | 382 |
| 12/15/2010 | 386 | | | 10/23/2012 | 382 |
| Total 2010 | 3050 | | | 11/13/2012 | 384 |
| | | | | 11/17/2012 | 384 |
| | | | | 11/29/2012 | 381 |
| | | | | 12/5/2012 | 384 |
| | | | | 12/12/2012 | 372 |
| | | | | Total 2012 | 4948 |

During operations depleted uranium compounds were only handled in glove boxes or fume hoods. Routine radiological surveys were conducted throughout the facility at weekly, monthly and quarterly frequencies and formed the basis of the area classifications and final status survey requirements.

Contamination was never identified outside of glove boxes or fume hoods used to handle depleted uranium compounds. Uranium contamination was never identified in the gas collection manifold outside of the reaction vessel or in the fluorine gas product and there was never any spill involving depleted uranium compounds.

Individual's that worked at the 1359 facility were monitored for whole body and extremity exposures, dosimeters were exchanged on a quarterly basis. During this period of operations the highest whole body dose recorded was 14 mrem in one quarter. This was the only instance when a whole body dose exceeding the 10 mrem detection limit of the dosimeter was recorded.

Routine bioassay via urinalysis had been conducted as a precautionary measure from January 2006 until December 2008. The results of these bioassays and continuous air monitoring and grab air sampling indicated that the engineering controls implemented prevented the release of uranium contamination in the work place so routine bioassays were curtailed, while continuous air monitoring or the workplace continued. During the period of operations air monitoring samples and routing bioassay measurements failed to detect the presence of uranium.

2.0 DECOMMISSIONING PLAN

The scope of the decommissioning activity was limited to releasing Building 1359 for unrestricted use to remove Building 1359 from NRC license SUB-1587 and to revise the authorized licensed activities to possession and storage.

Consistent with NUREG-1757 Volume 2; Building 1359 facility was categorized as Decommissioning Group 2 based on the operational history of the facility and results of routine contamination and airborne radioactive surveys performed during operations and extended periods of shut-down.

Decommissioning of the 1359 Building was sub-divided into the following tasks:

1. Planning and Preparation
2. Facility Characterization
3. Decontamination/Dismantling
4. Packaging
5. Radioactive Material Disposition
6. Final Status Survey and Evaluation

2.1 PLANNING AND PREPARATION

The planning and preparation phase of this decommissioning activity consisted of developing a task sequence and schedule, identifying and acquiring as necessary the equipment needed to complete the project, ensuring this equipment is available, calibrated as needed, and operable, identifying disposition path for items to be removed from the facility including the identification of storage areas, identifying release requirements for items to be left behind in the facility.

Background survey measurements were conducted on the concrete floor of the Utility Room (Room 102A) and along the concrete slab along the north and south roll-up doors; these areas are considered non-impacted.

Instrumentation utilized during the R&D activities were utilized during the decommissioning process, these instruments are identified below:

| Instrument | Serial Number | Calibration Due Date |
|----------------------------|---------------|----------------------|
| Ludlum 3030 | 210766 | 07/18/2013 |
| Ludlum 3030 | 210769 | 02/16/2013 |
| Ludlum 2360 w/ 43-93 probe | 202409/221513 | 07/08/2013 |

A disposition log was utilized to record equipment and components that were removed from the facility that may have been in contact with uncontained uranium. The disposition log identified the piece of equipment by name and serial number (as applicable), a brief description of the equipment, and type of disposition, i.e. storage for future use, storage for subsequent disposal as radioactive material, or unrestricted release. A copy of the log is included in this report.

2.2 FACILITY CHARACTERIZATION

Facility characterization was performed following the guidance provided in NUREG-1575, *Multi-Agency Radiation Survey and Site Investigation Manual*, (MARSSIM). Characterization typically consists of; historical site assessment followed by scoping and characterizations surveys, and remedial action surveys if necessary. Considering INIS has been the sole occupant to utilize radioactive materials at the 1359, characterization was conducted through a review of the routine surveys performed at the facility, which included weekly, monthly and quarterly contamination surveys and air sampling data. These surveys have been documented and maintained at the facility since the introduction of depleted uranium. It is important to note that during the course of depleted uranium operations the presence of uranium was never observed in any continuous air monitoring samples, in-line ventilation air samples, work coverage grab samples or in the fluorine gas production stream; and that contamination was never identified outside of any controlled area on building surfaces. The following definitions from the MARSSIM are included for clarity:

Class 1 area: An *area* that is projected to require a *Class 1 final status survey*.

Class 1 survey: A type of *final status survey* that applies to *areas* with the highest potential for contamination, and meet the following criteria: (1) *impacted*; (2) potential for delivering a dose above the *release criterion*; (3) potential for small *areas of elevated activity*; and (4) insufficient evidence to support reclassification as *Class 2* or *Class 3*.

Class 2 area: An *area* that is projected to require a *Class 2 final status survey*.

Class 2 survey: A type of *final status survey* that applies to *areas* that meet the following criteria: (1) *impacted*; (2) low potential for delivering a dose above the *release criterion*; and (3) little or no potential for small *areas of elevated activity*.

Class 3 area: An *area* that is projected to require a *Class 3 final status survey*.

Class 3 survey: A type of *final status survey* that applies to *areas* that meet the following criteria: (1) *impacted*; (2) little or no potential for delivering a dose above the *release criterion*; and (3) little or no potential for small *areas of elevated activity*.

Impacted area: Any *area* that is not *classified* as *non-impacted*. Areas with a possibility of containing *residual radioactivity* in excess of natural background or fallout levels.

Non-impacted area: Areas where there is no reasonable possibility (extremely low probability) of residual contamination.

Based on the operational history of the facility there are no Class 1 areas identified in the Building 1359 facility. Radioactive contamination was expected and confirmed in the ventilation duct that serviced the fume hood and glove boxes located in Room 304. The levels of contamination identified in the duct were less than 1,000 dpm over large area wipes. This portion of the duct work was sealed at both ends and transferred to the 4137 warehouse for subsequent disposal as radioactive waste. In-line air monitoring during operations downstream of the HEPA filters never identified the presence of uranium.

This section of duct was confirmed to be free of contamination downstream of the HEPA filters.

The facility areas have been classified based on the routine survey data and operational history. Area classifications are provided in the table below.

| Area Description | Floor | Walls (≤ 8 ft) | Ceilings/Walls (> 8 ft.) |
|---|-----------------|-------------------|-----------------------------|
| Reception Area Room 101 | Class 3 | Non-impacted | Non-impacted |
| Hallway 102 | Class 3 | Non-impacted | Non-impacted |
| Utility Room 102A | Non-impacted | Non-impacted | Non-impacted |
| Restrooms Rooms 102B & 102C | Class 3 | Non-impacted | Non-impacted |
| 2 nd Floor Conference Room 201 | Non-impacted | Non-impacted | Non-impacted |
| Gas Production Room 301 | Class 3 | Non-impacted | Non-impacted |
| Analytical Laboratory Room 302 | Class 3 | Non-impacted | Non-impacted |
| Count Room 303 | Class 2 | Class 3 | Non-impacted |
| DU Handling Room 304 | Class 2 | Class 3 | Non-impacted |
| Remainder of Process Area | Class 3 | Non-impacted | Non-impacted |
| 401 Process floor Mezzanine | Class 3 | N/A | Non-impacted |
| 402 Count Room/DU Handling Room Mezzanine | Class 3 | Non-impacted | Non-impacted |
| Building Exterior | Non-impacted | Non-impacted | Non-impacted |
| | | | |
| | Upstream Filter | Downstream Filter | |
| Room 304 Ventilation ⁽¹⁾ | Class 1 | Non-impacted | |
| Fluorine Gas Production Manifold ⁽²⁾ | Class 3 | Non-impacted | |

Notes: (1) HEPA Filter, (2) Metal Micron Filter

2.3 DECONTAMINATION/ DISMANTLING

Decontamination and dismantling and removal of ventilation ducting, fume hoods and equipment was conducted prior to final status surveys. A list of equipment removed from the facility, along with a copy of the radiological surveys supporting the removal are provided in Attachments 1 and 2.

2.4 PACKAGING

Packaging of material has been conducted as follows:

The DUF₄ remaining in the facility has been packaged in a PVC bag and was placed in 1 gallon tin can and transferred to the 4137 warehouse. All other depleted uranium compounds (oxides and oxide/fluoride mixes) were packaged in PVC bag and placed in a 1 gallon tin can and placed into radioactive waste storage at the 4137 warehouse.

Compactable waste, such as lab trash, swipes and PPE, were consolidated in double PVC bags for subsequent compaction at the 4137 facility.

The metal glove box, plexiglass glove box and small fume hood were sealed and transferred to the 4137 warehouse for storage. These items will be decontaminated as necessary and reutilized for other licensed operations.

2.5 RADIOACTIVE MATERIAL DISPOSITION

Radioactive active materials, including contaminated equipment have been transferred from the 1359 facility to the 4137 warehouse where it has been placed into storage until final disposition.

Unreacted DUF₄ was returned to DUF₄ inventory and is currently stored in the 4137 warehouse. Some, or all, of this inventory will either be transferred to International Isotopes Inc. NRC License SUB-1011 once the facility has been constructed or it will be disposed of at US Ecology's Richland, Washington waste disposal facility.

Reacted depleted uranium compounds have been transferred to the 4137 warehouse and were placed into radioactive waste storage to be disposed of at US Ecology's Richland, Washington waste disposal facility during the next waste disposal campaign.

Compactable radioactive waste that was located in the 1359 facility or had been generated during the decommissioning of the 1359 facility has been added compactable waste stream and will be compacted and subsequently disposed of at US Ecology's Richland, Washington waste disposal facility during the next waste disposal campaign.

Contaminated or potentially contaminated equipment/components that have no residual value have been packaged as described in section 2.4 above and were transferred to the 4137 warehouse for storage and subsequently disposed of at US Ecology's Richland, Washington waste disposal facility during the next waste disposal campaign.

Contaminated or potentially contaminated equipment/components that have residual value have been packaged as described in section 2.4 above and were transferred to the 4137 warehouse for storage and subsequent reuse or resale. Potentially contaminated equipment/components may be reused as is, if transferred to an authorized licensee. Potentially contaminated equipment/components would require decontamination prior to release for unrestricted use.

Uncontaminated equipment/components of residual value were removed from the facility and placed into appropriate storage containers/locations until final disposition.

2.6 FINAL STATUS SURVEY AND EVALUATION

Final status surveys were performed in accordance with the MARSSIM. Final status surveys consisted of direct and removable contamination surveys conducted in the Class 2 and Class 3 areas identified in the building, note that there are no Class 1 areas located in Building 1359. Surveys exterior to the building as well as soil and building media samples, i.e. paint, piping insulation, or concrete were not considered to be necessary

given the operating history of the facility and the physical and chemical form of the depleted uranium compounds handled during the brief operating history of the facility.

The Building 1359 facility had been divided into 8 survey units as follows:

| Floor | | Walls (≤ 8 ft) | Ceilings/Walls (> 8 ft.) | |
|---|--|-------------------------|-----------------------------|-----------|
| Survey Unit #1 | | | | |
| Stair way Conference Room 201 | Random scan of area, Direct survey followed by swipe at highest scan location in each room | | No survey | No Survey |
| | Location | Floor Area | | |
| | Room 201 | 488 ft ² | | |
| Survey Unit #2 | | | | |
| Reception Area Room 101 Hallway 102 Restrooms 102B & 102C | Scan 5% of area, Direct survey followed by swipe at 5 highest scan locations in each room | | No survey | No Survey |
| | Location | Floor Area | | |
| | Room 101 | 273 ft ² | | |
| | Hallway 102 | 64 ft ² | | |
| | Restroom 102B | 46 ft ² | | |
| Restroom 102C | 46 ft ² | | | |
| Survey Unit #3 | | | | |
| Gas Production Room 301 Analytical Lab Room 302 | Scan 5% of area, Direct survey followed by swipe at 5 highest scan locations in each room | | No survey | No Survey |
| | Location | Area (Ft ²) | | |
| | Room 301 | 350 ft ² | | |
| Room 302 | 521 ft ² | | | |
| Survey Unit #4 | | | | |
| 401 Mezzanine 402 Mezzanine | Scan 5% of area, Direct survey followed by swipe at 5 highest scan locations in each area | | No survey | No Survey |
| | Location | Area (Ft ²) | | |
| | 401 Mezzanine | 1010 ft ² | | |
| 402 Mezzanine | 391 ft ² | | | |
| Survey Unit #5 | | | | |
| SE Quarter of Process Area SW Quarter of Process Area | Scan 5% of high traffic area and random scan remainder Direct survey 5 followed by swipe at highest scan locations in each quadrant | | No survey | No Survey |
| | Location | Area (Ft ²) | | |
| | SE Qtr of PA | 1720 ft ² | | |
| SW Qtr of PA | 754 ft ² | | | |

| Floor | | Walls (≤ 8 ft) | Ceilings/Walls (> 8 ft.) |
|---|---|---|--|
| Survey Unit #6 | | | |
| NE Quarter of Process Area NW Quarter of Process Area | Scan 5% of high traffic area and random scan remainder Direct survey followed by swipe at 5 highest scan locations in each quadrant | No survey | No Survey |
| | Location | Area (Ft ²) | |
| | NE Qtr of PA | 2114 ft ² | |
| | NW Qtr of PA | 2114 ft ² | |
| Survey Unit #7 | | | |
| DU Handling Room 304 | Scan 25% of area. Direct survey followed by swipe at 10 highest scan locations | Scan 5% of area Direct survey, 2 highest scan locations each wall | Scan 100% of ceiling in 6 inch width along circumference of duct penetration Direct survey highest scan location |
| | Location | Area (Ft ²) | |
| | Room 304 | 230 ft ² | |
| Survey Unit #8 (To be surveyed after all other Final Status Surveys have been conducted and evaluated) | | | |
| Count Room 303 | Scan 25% of area. Direct survey followed by swipe at 5 highest scan locations | Scan 5% of area Direct survey highest scan location each wall | No survey |
| | Location | Area (Ft ²) | |
| | Room 303 | 105 ft ² | |

Final status surveys were documented on Forms F-33A Radiological Survey Report and F33-B, Radiological Survey Report Map.

An average Derived Concentration Guideline Level (DCGL_w) for the survey unit of 235 dpm/100 cm² was derived using the US Nuclear Regulatory Commission's D and D Code, Version 2.1.0 resulting in a TEDE = 2.16E+01 mRem (with 95% CI of 1.92E+01 to 2.45E+01 mRem) using the default Building Occupancy parameters.

A reference area background for scan and direct survey measurements was developed by obtaining 20 direct survey measurements utilizing the Ludlum Model 2360 with Model 43-93 probe. The reference area background was used to determine the minimum detectable activity for a 1 minute static measurement but was not subtracted from the direct survey measurements performed on the concrete building surfaces.

A mean background of 10.95 cpm/100cm² with a standard deviation of 2.96 cpm/100cm² (54.75 dpm/100cm² with a standard deviation of 14.28 dpm/100cm²) was determined for the concrete floor surfaces. The minimum detectable activity for a static 1 minute measurement was calculated as 91.98 dpm/100 cm², 39.1% of the DCGL_w and within the recommended 50% MDA:DCGL ratio.

The MDA equation is provided below:

$$MDA = \frac{3 + 3.29 \sqrt{RbTs \left(1 + \frac{Ts}{Tb}\right)}}{eff_i \times Ts \times \frac{Probe\ Area\ (cm^2)}{100}}$$

Where: Rb = Background countrate (10.95 cpm)
Ts = Sample count time (1 minute)
Tb = Background count time (1 minute)
eff_i = Insturment efficeency (20%)

Assuming a human performance efficiency of 50% and a scan rate of 5 inches/second, a scanning MDA of 881 dpm/100cm² would be observed. During the scan it is assumed that the radiological technician would pause for a period of 10 seconds above an area that exhibited elevated count rates. The scanning MDA during the pause period is calculated at 185 dpm/100cm². The Scanning MDA equation is provided below:

$$MDA_{scan} = \frac{3.29 \times \left[\sqrt{\frac{Rb \times i}{60}} \times \frac{60}{i} \right]}{eff_i \times eff_s \times \frac{Probe\ Area\ (cm^2)}{100}}$$

Where: Rb = Background countrate (10.95 cpm)
i = Observation interval during scan (0.44 seconds)
p = Performance efficeency (50%)
eff_i = Insturment efficeency (20%)
Eff_s = Surface efficeency (100%)

Note: The MDA scan equation during the 10 second pause period is the same as above, where i = 10 seconds.

Original final status surveys are maintained on file at the International Isotopes Inc. 4137 facility. While background measurements for direct surveys of the facility were obtained prior to conducting the final status surveys, the data presented below does not subtract the background for direct measurements nor is the instrument background subtracted from the swipe survey measurements providing conservative results.

In all survey units the maximum and average survey results are below the average Derived Concentration Guideline Level (DCGL_w) of 235 dpm/100 cm².

Summaries of the final status surveys conducted in Survey Units 1 through 8 are provided below.

Survey Unit #1: Final Status Survey Summary

| ID | Type | Serial # | Cal. Due | probe area (cm ²) | Eff. | Rb | Ts | Tb | MDA (dpm) | Units |
|----|-------------|----------|-----------|-------------------------------|------|-------|----|----|-----------|---------------------|
| 1 | Ludlum 3030 | 210766 | 7/18/2013 | N/A | 1.0 | 10 | 1 | 1 | 17.7 | /swipe |
| 2 | Ludlum 3030 | 210769 | 2/25/2014 | N/A | 1.0 | 10 | 1 | 1 | 17.7 | /swipe |
| 3 | Ludlum 2360 | 202397 | 10/9/2013 | 100 | 0.2 | 10.95 | 1 | 1 | 92.0 | /100cm ² |
| 4 | Ludlum 2360 | 202409 | 9/4/2013 | 100 | 0.2 | 10.95 | 1 | 1 | 92.0 | /100cm ² |

Notes: Ludlum 3030 efficiency = 100%, instrument reports results in dpm.

| Survey No. | Inst. ID | Location or Item Description | Gross count rate (cpm) | Net count rate (cpm) | Activity (dpm) | Units |
|------------|----------|---|------------------------|----------------------|----------------|----------------------------|
| 1 | 3 | Random Scan on of stairs | 20 | 20 | 100 | /100cm ² |
| 2 | 3 | Direct Survey on highest scan on stairs | 8 | 8 | 40 | /100cm ² |
| 3 | 1 | Swipe on highest scan on stairs | 12 | 12 | 12 | /swipe |
| 4 | 3 | Random Scan on floor room 201 | 20 | 20 | 100 | /100cm ² |
| 5 | 3 | Direct Survey highest scan 201 floor | 15 | 15 | 15 | /100cm ² |
| 6 | 2 | Swipe on highest scan 201 floor | 5 | 5 | 11 | /swipe |
| | | | | | Maximum: | 100 dpm/100cm ² |
| | | | | | Average: | 55 dpm/100cm ² |

Survey Unit #2: Final Status Survey Summary

| ID | Type | Serial # | Cal. Due | probe area (cm ²) | Eff. | Rb | Ts | Tb | MDA (dpm) | Units |
|----|-------------|----------|-----------|-------------------------------|------|-------|----|----|-----------|---------------------|
| 1 | Ludlum 3030 | 210766 | 7/18/2013 | N/A | 1 | 10 | 1 | 1 | 17.7 | /swipe |
| 2 | Ludlum 3030 | 210769 | 2/25/2014 | N/A | 1 | 10 | 1 | 1 | 17.7 | /swipe |
| 3 | Ludlum 2360 | 202397 | 10/9/2013 | 100 | 0.2 | 10.95 | 1 | 1 | 92.0 | /100cm ² |
| 4 | Ludlum 2360 | 202409 | 9/4/2013 | 100 | 0.2 | 10.95 | 1 | 1 | 92.0 | /100cm ² |

Notes: Ludlum 3030 efficiency = 100%, instrument reports results in dpm.

| Survey No. | Inst. ID | Location or Item Description | Gross count rate (cpm) | Net count rate (cpm) | Activity (dpm) | Units |
|------------|----------|---|------------------------|----------------------|----------------|---------------------|
| 1 | 3 | Scan on 5% of floor room 101 | 22 | 22 | 110 | /100cm ² |
| 2 | 3 | Direct Survey (1/5) highest scan room 101 | 5 | 5 | 25 | /100cm ² |
| 3 | 3 | Direct Survey (2/5) highest scan room 101 | 8 | 8 | 40 | /100cm ² |
| 4 | 3 | Direct Survey (3/5) highest scan room 101 | 6 | 6 | 30 | /100cm ² |
| 5 | 3 | Direct Survey (4/5) highest scan room 101 | 12 | 12 | 60 | /100cm ² |
| 6 | 3 | Direct Survey (5/5) highest scan room 101 | 11 | 11 | 55 | /100cm ² |
| 7 | 1 | Swipe floor (1/5) highest scan room 101 | 15 | 15 | 15 | /swipe |
| 8 | 2 | Swipe floor (2/5) highest scan room 101 | 8 | 8 | 8 | /swipe |
| 9 | 1 | Swipe floor (3/5) highest scan room 101 | 7 | 7 | 7 | /swipe |
| 10 | 2 | Swipe floor (4/5) highest scan room 101 | 2 | 2 | 2 | /swipe |
| 11 | 1 | Swipe floor (5/5) highest scan room 101 | 12 | 12 | 12 | /swipe |

| Survey No. | Inst. ID | Location or Item Description | Gross count rate (cpm) | Net count rate (cpm) | Activity (dpm) | Units | |
|------------|----------|--|------------------------|----------------------|----------------|---------------------|------------------------|
| 12 | 3 | Scan on 5% of floor hallway 102 | 10 | 10 | 50 | /100cm ² | |
| 13 | 3 | Direct Survey (1/5) highest scan hallway 102 | 16 | 16 | 80 | /100cm ² | |
| 14 | 3 | Direct Survey (2/5) highest scan hallway 102 | 13 | 13 | 65 | /100cm ² | |
| 15 | 3 | Direct Survey (3/5) highest scan hallway 102 | 9 | 9 | 45 | /100cm ² | |
| 16 | 3 | Direct Survey (4/5) highest scan hallway 102 | 8 | 8 | 40 | /100cm ² | |
| 17 | 3 | Direct Survey (5/5) highest scan hallway 102 | 9 | 9 | 45 | /100cm ² | |
| 18 | 2 | Swipe floor (1/5) highest scan hallway 102 | 0 | 0 | 0 | /swipe | |
| 19 | 1 | Swipe floor (2/5) highest scan hallway 102 | 12 | 12 | 12 | /swipe | |
| 20 | 2 | Swipe floor (3/5) highest scan hallway 102 | 8 | 8 | 8 | /swipe | |
| 21 | 1 | Swipe floor (4/5) highest scan hallway 102 | 20 | 20 | 20 | /swipe | |
| 22 | 2 | Swipe floor (5/5) highest scan hallway 102 | 8 | 8 | 8 | /swipe | |
| 23 | 3 | Scan on 5% of floor room 102B | 18 | 18 | 90 | /100cm ² | |
| 24 | 3 | Direct Survey (1/5) highest scan room 102B | 9 | 9 | 45 | /100cm ² | |
| 25 | 3 | Direct Survey (2/5) highest scan room 102B | 7 | 7 | 35 | /100cm ² | |
| 26 | 3 | Direct Survey (3/5) highest scan room 102B | 6 | 6 | 30 | /100cm ² | |
| 27 | 3 | Direct Survey (4/5) highest scan room 102B | 8 | 8 | 40 | /100cm ² | |
| 28 | 3 | Direct Survey (5/5) highest scan room 102B | 7 | 7 | 35 | /100cm ² | |
| 29 | 1 | Swipe floor (1/5) highest scan room 102B | 20 | 20 | 20 | /swipe | |
| 30 | 2 | Swipe floor (2/5) highest scan room 102B | 5 | 5 | 5 | /swipe | |
| 31 | 1 | Swipe floor (3/5) highest scan room 102B | 15 | 15 | 15 | /swipe | |
| 32 | 2 | Swipe floor (4/5) highest scan room 102B | 2 | 2 | 2 | /swipe | |
| 33 | 1 | Swipe floor (5/5) highest scan room 102B | 10 | 10 | 10 | /swipe | |
| 34 | 3 | Scan on 5% of floor room 102C | 8 | 8 | 40 | /100cm ² | |
| 35 | 3 | Direct Survey (1/5) highest scan room 102C | 2 | 2 | 10 | /100cm ² | |
| 36 | 3 | Direct Survey (2/5) highest scan room 102C | 9 | 9 | 45 | /100cm ² | |
| 37 | 3 | Direct Survey (3/5) highest scan room 102C | 6 | 6 | 30 | /100cm ² | |
| 38 | 3 | Direct Survey (4/5) highest scan room 102C | 7 | 7 | 35 | /100cm ² | |
| 39 | 3 | Direct Survey (5/5) highest scan room 102C | 7 | 7 | 35 | /100cm ² | |
| 40 | 2 | Swipe floor (1/5) highest scan room 102C | 8 | 8 | 8 | /swipe | |
| 41 | 1 | Swipe floor (2/5) highest scan room 102C | 15 | 15 | 15 | /swipe | |
| 42 | 2 | Swipe floor (3/5) highest scan room 102C | 2 | 2 | 2 | /swipe | |
| 43 | 1 | Swipe floor (4/5) highest scan room 102C | 20 | 20 | 20 | /swipe | |
| 44 | 2 | Swipe floor (5/5) highest scan room 102C | 13 | 13 | 13 | /swipe | |
| | | | | | Maximum: | 110 | dpm/100cm ² |
| | | | | | Average: | 30 | dpm/100cm ² |

Survey Unit #3: Final Status Survey Summary

| ID | Type | Serial # | Cal. Due | probe area (cm ²) | Eff. | Rb | Ts | Tb | MDA (dpm) | Units |
|----|-------------|----------|-----------|-------------------------------|------|-------|----|----|-----------|---------------------|
| 1 | Ludlum 3030 | 210766 | 7/18/2013 | N/A | 1 | 7 | 1 | 1 | 15.3 | /swipe |
| 2 | Ludlum 3030 | 210769 | 2/25/2014 | N/A | 1 | 5 | 1 | 1 | 13.4 | /swipe |
| 3 | Ludlum 2360 | 202397 | 10/9/2013 | 100 | 0.2 | 10.95 | 1 | 1 | 92.0 | /100cm ² |
| 4 | Ludlum 2360 | 202409 | 9/4/2013 | 100 | 0.2 | 10.95 | 1 | 1 | 92.0 | /100cm ² |

Notes: Ludlum 3030 efficiency = 100%, instrument reports results in dpm.

| Survey No. | Inst. ID | Location or Item Description | Gross count rate (cpm) | Net count rate (cpm) | Activity (dpm) | Units | |
|------------|----------|---|------------------------|----------------------|----------------|---------------------|------------------------|
| 1 | 4 | Scan on 5% of floor room 301 | 20 | 20 | 100 | /100cm ² | |
| 2 | 4 | Direct Survey (1/5) highest scan room 301 | 23 | 23 | 115 | /100cm ² | |
| 3 | 4 | Direct Survey (2/5) highest scan room 301 | 22 | 22 | 110 | /100cm ² | |
| 4 | 4 | Direct Survey (3/5) highest scan room 301 | 17 | 17 | 85 | /100cm ² | |
| 5 | 4 | Direct Survey (4/5) highest scan room 301 | 11 | 11 | 55 | /100cm ² | |
| 6 | 4 | Direct Survey (5/5) highest scan room 301 | 12 | 12 | 60 | /100cm ² | |
| 7 | 1 | Swipe floor (1/5) highest scan room 301 | 17 | 17 | 17 | /swipe | |
| 8 | 2 | Swipe floor (2/5) highest scan room 301 | 5 | 5 | 5 | /swipe | |
| 9 | 1 | Swipe floor (3/5) highest scan room 301 | 7 | 7 | 7 | /swipe | |
| 10 | 2 | Swipe floor (4/5) highest scan room 301 | 5 | 5 | 5 | /swipe | |
| 11 | 1 | Swipe floor (5/5) highest scan room 301 | 5 | 5 | 5 | /swipe | |
| 12 | 4 | Scan on 5% of floor room 302 | 20 | 20 | 100 | /100cm ² | |
| 13 | 4 | Direct Survey (1/5) highest scan room 302 | 12 | 12 | 60 | /100cm ² | |
| 14 | 4 | Direct Survey (2/5) highest scan room 302 | 8 | 8 | 40 | /100cm ² | |
| 15 | 4 | Direct Survey (3/5) highest scan room 302 | 13 | 13 | 65 | /100cm ² | |
| 16 | 4 | Direct Survey (4/5) highest scan room 302 | 14 | 14 | 70 | /100cm ² | |
| 17 | 4 | Direct Survey (5/5) highest scan room 302 | 12 | 12 | 60 | /100cm ² | |
| 18 | 2 | Swipe floor (1/5) highest scan room 302 | 0 | 0 | 0 | /swipe | |
| 19 | 1 | Swipe floor (2/5) highest scan room 302 | 7 | 7 | 7 | /swipe | |
| 20 | 2 | Swipe floor (2/5) highest scan room 302 | 5 | 5 | 5 | /swipe | |
| 21 | 1 | Swipe floor (4/5) highest scan room 302 | 5 | 5 | 5 | /swipe | |
| 22 | 2 | Swipe floor (5/5) highest scan room 302 | 2 | 2 | 2 | /swipe | |
| | | | | | Maximum: | 115 | dpm/100cm ² |
| | | | | | Average: | 44 | dpm/100cm ² |

Survey Unit #4: Final Status Survey Summary

| ID | Type | Serial # | Cal. Due | probe area (cm ²) | Eff. | Rb | Ts | Tb | MDA (dpm) | Units |
|----|-------------|----------|-----------|-------------------------------|------|-------|----|----|-----------|---------------------|
| 1 | Ludlum 3030 | 210766 | 7/18/2013 | N/A | 1 | 7 | 1 | 1 | 15.3 | /swipe |
| 2 | Ludlum 3030 | 210769 | 2/25/2014 | N/A | 1 | 5 | 1 | 1 | 13.4 | /swipe |
| 3 | Ludlum 2360 | 202397 | 10/9/2013 | 100 | 0.2 | 10.95 | 1 | 1 | 92.0 | /100cm ² |
| 4 | Ludlum 2360 | 202409 | 9/4/2013 | 100 | 0.2 | 10.95 | 1 | 1 | 92.0 | /100cm ² |

Notes: Ludlum 3030 efficiency = 100%, instrument reports results in dpm.

| Survey No. | Inst. ID | Location or Item Description | Gross count rate (cpm) | Net count rate (cpm) | Activity (dpm) | Units |
|------------|----------|--|------------------------|----------------------|----------------|---------------------|
| 1 | 4 | Scan on 5% of floor mezzanine 401 | 25 | 25 | 125 | /100cm ² |
| 2 | 4 | Direct Survey (1/5) highest scan mezzanine 401 | 13 | 13 | 65 | /100cm ² |
| 3 | 4 | Direct Survey (2/5) highest scan mezzanine 401 | 15 | 15 | 75 | /100cm ² |
| 4 | 4 | Direct Survey (3/5) highest scan mezzanine 401 | 11 | 11 | 55 | /100cm ² |
| 5 | 4 | Direct Survey (4/5) highest scan mezzanine 401 | 25 | 25 | 125 | /100cm ² |
| 6 | 4 | Direct Survey (5/5) highest scan mezzanine 401 | 16 | 16 | 80 | /100cm ² |
| 7 | 1 | Swipe floor (1/5) highest scan mezzanine 401 | 12 | 12 | 12 | /swipe |

| Survey No. | Inst. ID | Location or Item Description | Gross count rate (cpm) | Net count rate (cpm) | Activity (dpm) | Units | |
|------------|----------|--|------------------------|----------------------|----------------|---------------------|------------------------|
| 8 | 2 | Swipe floor (2/5) highest scan mezzanine 401 | 8 | 8 | 8 | /swipe | |
| 9 | 1 | Swipe floor (3/5) highest scan mezzanine 401 | 15 | 15 | 15 | /swipe | |
| 10 | 2 | Swipe floor (4/5) highest scan mezzanine 401 | 5 | 5 | 5 | /swipe | |
| 11 | 1 | Swipe floor (5/5) highest scan mezzanine 401 | 12 | 12 | 12 | /swipe | |
| 12 | 4 | Scan on 5% of floor mezzanine 402 | 30 | 30 | 150 | /100cm ² | |
| 13 | 4 | Direct Survey (1/5) highest scan mezzanine 402 | 17 | 17 | 85 | /100cm ² | |
| 14 | 4 | Direct Survey (2/5) highest scan mezzanine 402 | 21 | 21 | 105 | /100cm ² | |
| 15 | 4 | Direct Survey (3/5) highest scan mezzanine 402 | 26 | 26 | 130 | /100cm ² | |
| 16 | 4 | Direct Survey (4/5) highest scan mezzanine 402 | 21 | 21 | 105 | /100cm ² | |
| 17 | 4 | Direct Survey (5/5) highest scan mezzanine 402 | 20 | 20 | 100 | /100cm ² | |
| 18 | 1 | Swipe floor (1/5) highest scan mezzanine 402 | 17 | 17 | 17 | /swipe | |
| 19 | 2 | Swipe floor (2/5) highest scan mezzanine 402 | 5 | 5 | 5 | /swipe | |
| 20 | 1 | Swipe floor (3/5) highest scan mezzanine 402 | 10 | 10 | 10 | /swipe | |
| 21 | 2 | Swipe floor (4/5) highest scan mezzanine 402 | 5 | 5 | 5 | /swipe | |
| 22 | 1 | Swipe floor (5/5) highest scan mezzanine 402 | 10 | 10 | 10 | /swipe | |
| | | | | | Maximum: | 150 | dpm/100cm ² |
| | | | | | Average: | 59 | dpm/100cm ² |

Survey Unit #5: Final Status Survey Summary

| ID | Type | Serial # | Cal. Due | probe area (cm ²) | Eff. | Rb | Ts | Tb | MDA (dpm) | Units |
|----|-------------|----------|-----------|-------------------------------|------|-------|----|----|-----------|---------------------|
| 1 | Ludlum 3030 | 210766 | 7/18/2013 | N/A | 1 | 7 | 1 | 1 | 15.3 | /swipe |
| 2 | Ludlum 3030 | 210769 | 2/25/2014 | N/A | 1 | 5 | 1 | 1 | 13.4 | /swipe |
| 3 | Ludlum 2360 | 202397 | 10/9/2013 | 100 | 0.2 | 10.95 | 1 | 1 | 92.0 | /100cm ² |
| 4 | Ludlum 2360 | 202409 | 9/4/2013 | 100 | 0.2 | 10.95 | 1 | 1 | 92.0 | /100cm ² |

Notes: Ludlum 3030 efficiency = 100%, instrument reports results in dpm.

| Survey No. | Inst. ID | Location or Item Description | Gross count rate (cpm) | Net count rate (cpm) | Activity (dpm) | Units |
|------------|----------|---|------------------------|----------------------|----------------|---------------------|
| 1 | 4 | Scan 5% of high traffic SE Process floor | 25 | 25 | 125 | /100cm ² |
| 2 | 4 | Random Scan remainder SE Process floor | 20 | 20 | 100 | /100cm ² |
| 3 | 4 | Direct Survey (1/5) highest scan SE floor | 14 | 14 | 70 | /100cm ² |
| 4 | 4 | Direct Survey (2/5) highest scan SE floor | 5 | 5 | 25 | /100cm ² |
| 5 | 4 | Direct Survey (3/5) highest scan SE floor | 15 | 15 | 75 | /100cm ² |
| 6 | 4 | Direct Survey (4/5) highest scan SE floor | 13 | 13 | 65 | /100cm ² |
| 7 | 4 | Direct Survey (5/5) highest scan SE floor | 12 | 12 | 60 | /100cm ² |
| 8 | 1 | Swipe floor (1/5) highest scan SE floor | 10 | 10 | 22 | /swipe |
| 9 | 2 | Swipe floor (2/5) highest scan SE floor | 5 | 5 | 11 | /swipe |
| 10 | 1 | Swipe floor (3/5) highest scan SE floor | 7 | 7 | 16 | /swipe |
| 11 | 2 | Swipe floor (4/5) highest scan SE floor | 5 | 5 | 11 | /swipe |
| 12 | 1 | Swipe floor (5/5) highest scan SE floor | 17 | 17 | 38 | /swipe |
| 13 | 4 | Scan 5% of high traffic SW Process floor | 25 | 25 | 125 | /100cm ² |
| 14 | 4 | Random Scan remainder SW Process floor | 25 | 25 | 125 | /100cm ² |

| Survey No. | Inst. ID | Location or Item Description | Gross count rate (cpm) | Net count rate (cpm) | Activity (dpm) | Units |
|------------|----------|---|------------------------|----------------------|----------------|----------------------------|
| 15 | 4 | Direct Survey (1/5) highest scan SW floor | 22 | 22 | 110 | /100cm ² |
| 16 | 4 | Direct Survey (2/5) highest scan SW floor | 17 | 17 | 85 | /100cm ² |
| 17 | 4 | Direct Survey (3/5) highest scan SW floor | 22 | 22 | 110 | /100cm ² |
| 18 | 4 | Direct Survey (4/5) highest scan SW floor | 17 | 17 | 85 | /100cm ² |
| 19 | 4 | Direct Survey (5/5) highest scan SW floor | 17 | 17 | 85 | /100cm ² |
| 20 | 2 | Swipe floor (1/5) highest scan SW floor | 2 | 2 | 4 | /swipe |
| 21 | 1 | Swipe floor (2/5) highest scan SW floor | 12 | 12 | 27 | /swipe |
| 22 | 2 | Swipe floor (3/5) highest scan SW floor | 8 | 8 | 18 | /swipe |
| 23 | 1 | Swipe floor (4/5) highest scan SW floor | 17 | 17 | 38 | /swipe |
| 24 | 2 | Swipe floor (5/5) highest scan SW floor | 5 | 5 | 11 | /swipe |
| | | | | | Maximum: | 125 dpm/100cm ² |
| | | | | | Average: | 60 dpm/100cm ² |

Survey Unit #6: Final Status Survey Summary

| ID | Type | Serial # | Cal. Due | probe area (cm ²) | Eff. | Rb | Ts | Tb | MDA (dpm) | Units |
|----|-------------|----------|-----------|-------------------------------|------|-------|----|----|-----------|---------------------|
| 1 | Ludlum 3030 | 210766 | 7/18/2013 | N/A | 1 | 7 | 1 | 1 | 15.3 | /swipe |
| 2 | Ludlum 3030 | 210769 | 2/25/2014 | N/A | 1 | 5 | 1 | 1 | 13.4 | /swipe |
| 3 | Ludlum 2360 | 202397 | 10/9/2013 | 100 | 0.2 | 10.95 | 1 | 1 | 92.0 | /100cm ² |
| 4 | Ludlum 2360 | 202409 | 9/4/2013 | 100 | 0.2 | 10.95 | 1 | 1 | 92.0 | /100cm ² |

Notes: Ludlum 3030 efficiency = 100%, instrument reports results in dpm.

| Survey No. | Inst. ID | Location or Item Description | Gross count rate (cpm) | Net count rate (cpm) | Activity (dpm) | Units |
|------------|----------|---|------------------------|----------------------|----------------|---------------------|
| 1 | 3 | Scan 5% of high traffic NE Process floor | 30 | 30 | 150 | /100cm ² |
| 2 | 3 | Random Scan remainder NE Process floor | 20 | 20 | 100 | /100cm ² |
| 3 | 3 | Direct Survey (1/5) highest scan NE floor | 7 | 7 | 35 | /100cm ² |
| 4 | 3 | Direct Survey (2/5) highest scan NE floor | 17 | 17 | 85 | /100cm ² |
| 5 | 3 | Direct Survey (3/5) highest scan NE floor | 15 | 15 | 75 | /100cm ² |
| 6 | 3 | Direct Survey (4/5) highest scan NE floor | 6 | 6 | 30 | /100cm ² |
| 7 | 3 | Direct Survey (5/5) highest scan NE floor | 36 | 36 | 180 | /100cm ² |
| 8 | 1 | Swipe floor (1/5) highest scan NE floor | 11 | 11 | 11 | /swipe |
| 9 | 2 | Swipe floor (2/5) highest scan NE floor | 0 | 0 | 0 | /swipe |
| 10 | 1 | Swipe floor (3/5) highest scan NE floor | 15 | 15 | 15 | /swipe |
| 11 | 2 | Swipe floor (4/5) highest scan NE floor | 10 | 10 | 10 | /swipe |
| 12 | 1 | Swipe floor (5/5) highest scan NE floor | 10 | 10 | 10 | /swipe |
| 13 | 3 | Scan 5% of high traffic NW Process floor | 25 | 25 | 125 | /100cm ² |
| 14 | 3 | Random Scan remainder NW Process floor | 25 | 25 | 125 | /100cm ² |
| 15 | 3 | Direct Survey (1/5) highest scan NW floor | 8 | 8 | 40 | /100cm ² |
| 16 | 3 | Direct Survey (2/5) highest scan NW floor | 11 | 11 | 55 | /100cm ² |
| 17 | 3 | Direct Survey (3/5) highest scan NW floor | 9 | 9 | 45 | /100cm ² |
| 18 | 3 | Direct Survey (4/5) highest scan NW floor | 8 | 8 | 40 | /100cm ² |
| 19 | 3 | Direct Survey (5/5) highest scan NW floor | 24 | 24 | 120 | /100cm ² |

| Survey No. | Inst. ID | Location or Item Description | Gross count rate (cpm) | Net count rate (cpm) | Activity (dpm) | Units |
|------------|----------|---|------------------------|----------------------|----------------|----------------------------|
| 20 | 2 | Swipe floor (1/5) highest scan NW floor | 5 | 5 | 5 | /swipe |
| 21 | 1 | Swipe floor (2/5) highest scan NW floor | 10 | 10 | 10 | /swipe |
| 22 | 2 | Swipe floor (3/5) highest scan NW floor | 2 | 2 | 2 | /swipe |
| 23 | 1 | Swipe floor (4/5) highest scan NW floor | 12 | 12 | 12 | /swipe |
| 24 | 2 | Swipe floor (5/5) highest scan NW floor | 8 | 8 | 8 | /swipe |
| | | | | | Maximum: | 180 dpm/100cm ² |
| | | | | | Average: | 54 dpm/100cm ² |

Survey Unit #7: Final Status Survey Summary

| ID | Type | Serial # | Cal. Due | probe area (cm ²) | Eff. | Rb | Ts | Tb | MDA (dpm) | Units |
|----|-------------|----------|-----------|-------------------------------|------|-------|----|----|-----------|---------------------|
| 1 | Ludlum 3030 | 210766 | 7/18/2013 | N/A | 1 | 10 | 1 | 1 | 17.7 | /swipe |
| 2 | Ludlum 3030 | 210769 | 2/25/2014 | N/A | 1 | 10 | 1 | 1 | 17.7 | /swipe |
| 3 | Ludlum 2360 | 202397 | 10/9/2013 | 100 | 0.2 | 10.95 | 1 | 1 | 92.0 | /100cm ² |
| 4 | Ludlum 2360 | 202409 | 9/4/2013 | 100 | 0.2 | 10.95 | 1 | 1 | 92.0 | /100cm ² |

Notes: Ludlum 3030 efficiency = 100%, instrument reports results in dpm.

| Survey No. | Inst. ID | Location or Item Description | Gross count rate (cpm) | Net count rate (cpm) | Activity (dpm) | Units |
|------------|----------|--|------------------------|----------------------|----------------|---------------------|
| 1 | 4 | 304 floor scan 25% of sector 1 | 20 | 20 | 100 | /100cm ² |
| 2 | 4 | 304 floor scan 25% of sector 2 | 20 | 20 | 100 | /100cm ² |
| 3 | 4 | 304 floor scan 25% of sector 3 | 10 | 10 | 50 | /100cm ² |
| 4 | 4 | 304 floor scan 25% of sector 4 | 10 | 10 | 50 | /100cm ² |
| 5 | 4 | 304 floor scan 25% of sector 5 | 10 | 10 | 50 | /100cm ² |
| 6 | 4 | 304 floor scan 25% of sector 6 | 30 | 30 | 150 | /100cm ² |
| 7 | 4 | 304 floor scan 25% of sector 7 | 10 | 10 | 50 | /100cm ² |
| 8 | 4 | 304 floor scan 25% of sector 8 | 10 | 10 | 50 | /100cm ² |
| 9 | 4 | 304 floor scan 25% of sector 9 | 10 | 10 | 50 | /100cm ² |
| 10 | 4 | 304 floor scan 25% of sector 10 | 10 | 10 | 50 | /100cm ² |
| 11 | 4 | 304 floor scan 25% of sector 11 | 10 | 10 | 50 | /100cm ² |
| 12 | 4 | 304 floor scan 25% of sector 12 | 10 | 10 | 50 | /100cm ² |
| 13 | 4 | 304 floor scan 25% of sector 13 | 10 | 10 | 50 | /100cm ² |
| 14 | 4 | 304 floor scan 25% of sector 14 | 20 | 20 | 100 | /100cm ² |
| 15 | 4 | 304 floor scan 25% of sector 15 | 10 | 10 | 50 | /100cm ² |
| 16 | 4 | Direct Survey highest floor scan sector 6 | 28 | 28 | 140 | /100cm ² |
| 17 | 4 | Direct Survey highest floor scan sector 1 | 19 | 19 | 95 | /100cm ² |
| 18 | 4 | Direct Survey highest floor scan sector 2 | 15 | 15 | 75 | /100cm ² |
| 19 | 4 | Direct Survey highest floor scan sector 14 | 15 | 15 | 75 | /100cm ² |
| 20 | 4 | Direct Survey highest floor scan sector 5 | 19 | 19 | 95 | /100cm ² |
| 21 | 4 | Direct Survey highest floor scan sector 12 | 15 | 15 | 75 | /100cm ² |
| 22 | 4 | Direct Survey highest floor scan sector 11 | 21 | 21 | 105 | /100cm ² |
| 23 | 4 | Direct Survey highest floor scan sector 8 | 7 | 7 | 35 | /100cm ² |
| 24 | 4 | Direct Survey highest floor scan sector 4 | 19 | 19 | 95 | /100cm ² |
| 25 | 4 | Direct Survey highest floor scan sector 10 | 6 | 6 | 30 | /100cm ² |

| Survey No. | Inst. ID | Location or Item Description | Gross count rate (cpm) | Net count rate (cpm) | Activity (dpm) | Units | |
|------------|----------|---|------------------------|----------------------|----------------|---------------------|------------------------|
| 26 | 1 | Swipe floor highest scan sector 6 | 10 | 10 | 10 | /swipe | |
| 27 | 2 | Swipe floor highest scan sector 1 | 7 | 7 | 7 | /swipe | |
| 28 | 1 | Swipe floor highest scan sector 2 | 0 | 0 | 0 | /swipe | |
| 29 | 2 | Swipe floor highest scan sector 14 | 7 | 7 | 7 | /swipe | |
| 30 | 1 | Swipe floor highest scan sector 5 | 10 | 10 | 10 | /swipe | |
| 31 | 2 | Swipe floor highest scan sector 12 | 12 | 12 | 12 | /swipe | |
| 32 | 1 | Swipe floor highest scan sector 11 | 2 | 2 | 2 | /swipe | |
| 33 | 2 | Swipe floor highest scan sector 8 | 7 | 7 | 7 | /swipe | |
| 34 | 1 | Swipe floor highest scan sector 4 | 2 | 2 | 2 | /swipe | |
| 35 | 2 | Swipe floor highest scan sector 10 | 0 | 0 | 0 | /swipe | |
| 36 | 4 | Scan on 5% of N. wall up to 8 ft. | 20 | 20 | 100 | /100cm ² | |
| 37 | 4 | Scan on 5% of E. wall up to 8 ft. | 10 | 10 | 50 | /100cm ² | |
| 38 | 4 | Scan on 5% of S. wall up to 8 ft. | 20 | 20 | 100 | /100cm ² | |
| 39 | 4 | Scan on 5% of W. wall up to 8 ft. | 20 | 20 | 100 | /100cm ² | |
| 40 | 4 | Direct Survey (1/2) highest scan N. wall | 5 | 5 | 25 | /100cm ² | |
| 41 | 4 | Direct Survey (2/2) highest scan N. wall | 17 | 17 | 85 | /100cm ² | |
| 42 | 4 | Direct Survey (1/2) highest scan E. wall | 12 | 12 | 60 | /100cm ² | |
| 43 | 4 | Direct Survey (2/2) highest scan E. wall | 12 | 12 | 60 | /100cm ² | |
| 44 | 4 | Direct Survey (1/2) highest scan S. wall | 11 | 11 | 55 | /100cm ² | |
| 45 | 4 | Direct Survey (2/2) highest scan S. wall | 11 | 11 | 55 | /100cm ² | |
| 46 | 4 | Direct Survey (1/2) highest scan W. wall | 18 | 18 | 90 | /100cm ² | |
| 47 | 4 | Direct Survey (2/2) highest scan W. wall | 13 | 13 | 65 | /100cm ² | |
| 48 | 4 | Scan ceiling 6 inch width around duct opening | 10 | 10 | 50 | /100cm ² | |
| 49 | 4 | Direct Survey highest scan of duct opening | 5 | 5 | 25 | /100cm ² | |
| 50 | 1 | Swipe highest scan around duct opening | 2 | 2 | 2 | /swipe | |
| | | | | | Maximum: | 150 | dpm/100cm ² |
| | | | | | Average: | 56 | dpm/100cm ² |

Survey Unit #8: Final Status Survey Summary

| ID | Type | Serial # | Cal. Due | probe area (cm ²) | Eff. | Rb | Ts | Tb | MDA (dpm) | Units |
|----|-------------|----------|-----------|-------------------------------|------|-------|----|----|-----------|---------------------|
| 1 | Ludlum 3030 | 210766 | 7/18/2013 | N/A | 1 | 7 | 1 | 1 | 15.3 | /swipe |
| 2 | Ludlum 3030 | 210769 | 2/25/2014 | N/A | 1 | 5 | 1 | 1 | 13.4 | /swipe |
| 3 | Ludlum 2360 | 202397 | 10/9/2013 | 100 | 0.2 | 10.95 | 1 | 1 | 92.0 | /100cm ² |
| 4 | Ludlum 2360 | 202409 | 9/4/2013 | 100 | 0.2 | 10.95 | 1 | 1 | 92.0 | /100cm ² |

Notes: Ludlum 3030 efficiency = 100%, instrument reports results in dpm.

| Survey No. | Inst. ID | Location or Item Description | Gross count rate (cpm) | Net count rate (cpm) | Activity (dpm) | Units |
|------------|----------|--------------------------------|------------------------|----------------------|----------------|---------------------|
| 1 | 4 | 303 floor scan 25% of sector 1 | 10 | 10 | 50 | /100cm ² |
| 2 | 4 | 303 floor scan 25% of sector 2 | 10 | 10 | 50 | /100cm ² |
| 3 | 4 | 303 floor scan 25% of sector 3 | 10 | 10 | 50 | /100cm ² |
| 4 | 4 | 303 floor scan 25% of sector 4 | 20 | 20 | 100 | /100cm ² |
| 5 | 4 | 303 floor scan 25% of sector 5 | 20 | 20 | 100 | /100cm ² |
| 6 | 4 | 303 floor scan 25% of sector 6 | 10 | 10 | 50 | /100cm ² |

| Survey No. | Inst. ID | Location or Item Description | Gross count rate (cpm) | Net count rate (cpm) | Activity (dpm) | Units |
|------------|----------|---|------------------------|----------------------|----------------|------------------------|
| 7 | 4 | Direct Survey highest floor scan sector 4 | 12 | 12 | 60 | /100cm ² |
| 8 | 4 | Direct Survey highest floor scan sector 5 | 17 | 17 | 85 | /100cm ² |
| 9 | 4 | Direct Survey highest floor scan sector 1 | 14 | 14 | 70 | /100cm ² |
| 10 | 4 | Direct Survey highest floor scan sector 2 | 16 | 16 | 80 | /100cm ² |
| 11 | 4 | Direct Survey highest floor scan sector 3 | 15 | 15 | 75 | /100cm ² |
| 12 | 1 | Swipe floor highest scan sector 4 | 5 | 5 | 5 | /swipe |
| 13 | 2 | Swipe floor highest scan sector 5 | 2 | 2 | 2 | /swipe |
| 14 | 1 | Swipe floor highest scan sector 1 | 12 | 12 | 12 | /swipe |
| 15 | 2 | Swipe floor highest scan sector 2 | 8 | 8 | 8 | /swipe |
| 16 | 1 | Swipe floor highest scan sector 3 | 5 | 5 | 5 | /swipe |
| 17 | 4 | Scan on 5% of N. wall up to 8 ft. | 10 | 10 | 50 | /100cm ² |
| 18 | 4 | Scan on 5% of E. wall up to 8 ft. | 20 | 20 | 100 | /100cm ² |
| 19 | 4 | Scan on 5% of S. wall up to 8 ft. | 10 | 10 | 50 | /100cm ² |
| 20 | 4 | Scan on 5% of W. wall up to 8 ft. | 10 | 10 | 50 | /100cm ² |
| 21 | 4 | Direct Survey highest scan N. wall | 10 | 10 | 50 | /100cm ² |
| 22 | 4 | Direct Survey highest scan E. wall | 22 | 22 | 110 | /100cm ² |
| 23 | 4 | Direct Survey highest scan S. wall | 10 | 10 | 50 | /100cm ² |
| 24 | 4 | Direct Survey highest scan W. wall | 11 | 11 | 55 | /100cm ² |
| Maximum: | | | | | 110 | dpm/100cm ² |
| Average: | | | | | 55 | dpm/100cm ² |

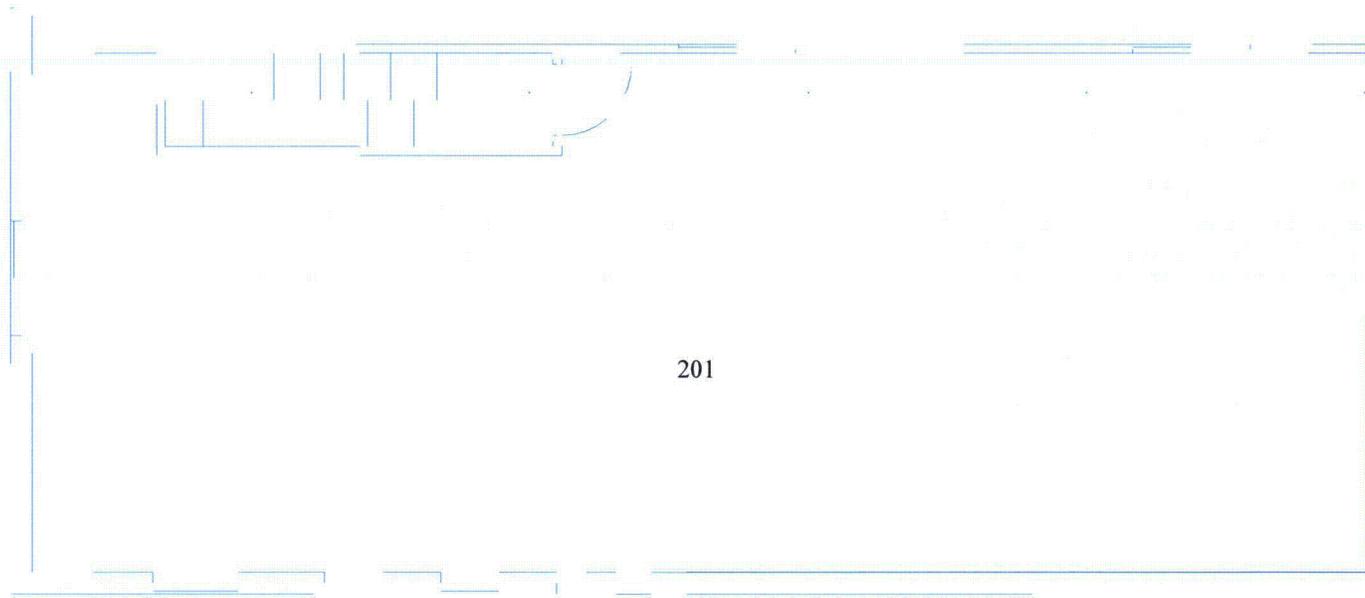
3.0 REFERENCES

- [1] NUREG-1575, *Multi-Agency Radiation Survey and Site Investigation Manual*, Washington D.C: Nuclear Regulatory Commission, December 1997
- [2] NUREG-1757, *Consolidated Decommissioning Guidance*, Volumes 1 & 2 Washington D.C: Nuclear Regulatory Commission, September 2006
- [3] US Nuclear Regulatory Commission DandD Version 2.1.0
- [4] ORNL-6913, *Total Effective Dose Equivalent Associated with Fixed Uranium Surface Contamination*, Oak Ridge National Laboratory, Oak Ridge TN, April 1997

Figure 1. International Isotope Inc. FEP First Floor



Figure 2. International Isotope Inc. FEP Second Floor





International Isotopes Inc.

Potentially Contaminated Equipment Disposition Log

Page 1 of 3

| No. | Item Name or Description / Serial Number | Location Transferred to | Code ⁽¹⁾ | Survey Attached |
|-----|---|-------------------------|---------------------|-----------------|
| 1 | Fume Hood - EASTEC Monair / BFC10-04SLC / USA | 4137 Warehouse | A | Y |
| 2 | Plexiglas glove box / FEP 0196 | 4137 Warehouse | A | Y |
| 3 | Air pump / sn 3109 / FEP 0199 | 4137 Warehouse | A | Y |
| 4 | Thermal Anemometer / FEP 0205 | 4137 Warehouse | C | Y |
| 5 | Alpha 7 continuous air monitor / sn 222 | 4137 Warehouse | A | Y |
| 6 | Chemical Reactor | 4137 Warehouse | B | Y |
| 7 | Post Chemical Reactor filter vessel | 4137 Warehouse | B | Y |
| 8 | Chair / FEP 0200 | 4137 Warehouse | C | Y |
| 9 | Foot Heat Sealer / #443 Singer Sealer | 4137 Warehouse | C | Y |
| 10 | HEPA vacuum / sn 197913 | 4137 Warehouse | A | Y |
| 11 | Stool / FEP 0194 | 4137 Warehouse | C | Y |
| 12 | Old Flange and parts | 4137 Warehouse | A | Y |
| 13 | Lab coats / 5 cloth coats | 4137 Warehouse | C | Y |
| 14 | Wall Mounted Lock Box / FEP 0203 | 4137 Warehouse | C | Y |
| 15 | Lindberg Blue M Tube Furnace / sn R04P-504606-RP / FEP 0220 | 4137 Warehouse | A | Y |
| 16 | Tube Furnace Tube | 4137 Warehouse | B | Y |
| 17 | Chemical Reactor Air Pressure Gauge and Tubing | 4137 Warehouse | C | Y |
| 18 | Wall Mounted duct support braces | 4137 Warehouse | C | Y |
| 19 | Lg Storage locker room 303 / FEP 0221 | 4137 Warehouse | C | Y |
| 20 | Movable cabinet with drawers & countertop / FEP 0188 | 4137 Warehouse | C | Y |
| 21 | 55 gallon cold waste barrel | 4137 Warehouse | C | Y |
| 22 | 20 gallon waste can | 4137 Warehouse | C | Y |
| 23 | Wall mounted shelf | 4137 Warehouse | C | Y |

Note (1): Code: (A) Storage for Future Use. (B) Storage for subsequent disposal as Radioactive Material. (C) Unrestricted Release

USE ADDITIONAL SHEETS AS NECESSARY



International Isotopes Inc.

Potentially Contaminated Equipment Disposition Log

Page 2 of 3

| No. | Item Name or Description / Serial Number | Location Transferred to | Code ⁽¹⁾ | Survey Attached |
|-----|--|-------------------------|---------------------|-----------------|
| 24 | Hoffman electric wire box & wire | 4137 Warehouse | C | Y |
| 25 | Anti-contamination suits | 4137 Warehouse | A | Y |
| 26 | Double bagged Contaminated 3' long Steel half pipe | 4137 Warehouse | B | Y |
| 27 | Filling Cabinet room 303 / FEP 0218 | 4137 Warehouse | C | Y |
| 28 | Methanol bottle, Acetone bottle, and Empty plastic bottles | 4137 Warehouse | C | Y |
| 29 | Clock | 4137 Warehouse | C | Y |
| 30 | Scoop | 4137 Warehouse | A | Y |
| 31 | Air duct upstream of HEPA Filter Unit | 4137 Warehouse | B | Y |
| 32 | Probe inside duct upstream of HEPA Filter Unit | 4137 Warehouse | B | Y |
| 33 | HEPA Filter Unit | 4137 Warehouse | B | Y |
| 34 | Air duct downstream of HEPA Filter Unit | 4137 Warehouse | C | Y |
| 35 | Room 304 air duct support braces | 4137 Warehouse | C | Y |
| 36 | Room 303 Lg waste storage locker / FEP 0221 | 4137 Warehouse | C | Y |
| 37 | 55 gallon hot waste barrel | 4137 Warehouse | C | Y |
| 38 | Check source lock box / FEP 0212 | 4137 Warehouse | A | Y |
| 39 | Alpha Spectroscopy detector / FEP 0215 | 4137 Warehouse | A | Y |
| 40 | Computer / FEP 0217 | 4137 Warehouse | C | Y |
| 41 | Computer Monitor and Keyboard / FEP 216 | 4137 Warehouse | C | Y |
| 42 | Computer desk / FEP 0210 | 4137 Warehouse | C | Y |
| 43 | Alpha Spec vacuum Pump sn 0282 | 4137 Warehouse | A | Y |
| 44 | Count room steel Table / FEP 0013 | 4137 Warehouse | C | Y |
| 45 | Ludlum 3030 detector sn 210769 / FEP 0210 | 4137 Warehouse | A | Y |

Note (1): Code: (A) Storage for Future Use. (B) Storage for subsequent disposal as Radioactive Material. (C) Unrestricted Release

USE ADDITIONAL SHEETS AS NECESSARY

I³ RADIOLOGICAL SURVEY REPORT

Contamination Survey Instrument Data

| ID | Type | Serial # | Cal. Due | probe area (cm ²) | Eff. | Bkg count rate (cpm) Rb | Sample count time (minute) Ts | Bkg count time (minute) Tb | MDA (pCi) | Units |
|----|-------------|----------|-----------|-------------------------------|------|-------------------------|-------------------------------|----------------------------|-----------|---------------------|
| 1 | Ludlum 3030 | 210766 | 7/18/2013 | N/A | 1 | 7.9 | 1 | 1 | 7.2 | /swipe |
| 2 | Ludlum 3030 | 210769 | 2/25/2014 | N/A | 1 | 6.5 | 1 | 1 | 6.7 | /swipe |
| 3 | Ludlum 2360 | 202397 | 10/9/2013 | 100 | 0.2 | 10.95 | 1 | 1 | 41.4 | /100cm ² |
| 4 | Ludlum 2360 | 202409 | 9/4/2013 | 100 | 0.2 | 10.95 | 1 | 1 | 41.4 | /100cm ² |

Radiation Survey Instrument Data

| Type | Serial # | Cal. Due |
|------|----------|----------|
| | | |
| | | |
| | | |

$$MDA = \frac{3 + 3.29 \sqrt{RbTs \left(1 + \frac{Ts}{Tb}\right)}}{\text{efficiency} \times Ts \times \frac{\text{Probe Area (cm}^2\text{)}}{100}}$$

| Survey No. | Type (D, S, L) | Inst. ID | Location or Item Description | Gross count rate (cpm) | Net count rate (cpm) | Activity (pCi) | Units |
|------------|----------------|----------|--|------------------------|----------------------|----------------|---------------------|
| 1 | D | 3 | External of ASTEC Monair Fume Hood | 4 | -6.95 | -16 | /100cm ² |
| 2 | D | 3 | External of Plexiglas Glove Box | 10 | -0.95 | -2 | /100cm ² |
| 3 | L | 3 | External of Plexiglas Glove Box | 6 | -4.95 | -11 | /LAW |
| 4 | L | 3 | Air Pump / sn 3109 / FEP 0199 | 2 | -8.95 | -20 | /LAW |
| 5 | D | 3 | Air Pump / sn 3109 / FEP 0199 | 3 | -7.95 | -18 | /100cm ² |
| 6 | L | 3 | Thermal Anemometer / FEP 0205 | 2 | -8.95 | -20 | /LAW |
| 7 | D | 3 | Alpha 7 CAM / sn 222 | 15 | 4.05 | 9 | /100cm ² |
| 8 | S | 1 | External of Post Reactor Filter Vessel | 2 | -5.9 | -3 | /swipe |
| 9 | D | 3 | External of Post Reactor Filter Vessel | 4 | -6.95 | -16 | /100cm ² |
| 10 | S | 1 | External of Chemical Reactor | 12 | 4.1 | 2 | /swipe |
| 11 | D | 3 | External of Chemical Reactor | 14 | 3.05 | 7 | /100cm ² |
| 12 | S | 1 | External of Chemical Reactor | 10 | 2.1 | 1 | /swipe |
| 13 | S | 1 | External of Chemical Reactor | 10 | 2.1 | 1 | /swipe |
| 14 | L | 3 | External of Chemical Reactor | 2 | -8.95 | -20 | /LAW |
| 15 | L | 3 | Chair / FEP 0200 | 2 | -8.95 | -20 | /LAW |
| 16 | L | 3 | Foot Heat Sealer / #443 Singer Sealer | 5 | -5.95 | -13 | /LAW |
| 17 | D | 3 | Foot Heat Sealer / #443 Singer Sealer | 10 | -0.95 | -2 | /100cm ² |
| 18 | L | 3 | HEPA Vacuum / sn 197913 | 2 | -8.95 | -20 | /LAW |
| 19 | D | 3 | HEPA Vacuum / sn 197913 | 10 | -0.95 | -2 | /100cm ² |
| 20 | L | 2 | Stool / FEP 0194 | 1 | -5.5 | -2 | /LAW |
| 21 | D | 3 | Stool / FEP 0194 | 3 | -7.95 | -18 | /100cm ² |

Survey Types

D = Direct Scan
S = Swipe
L = Large Area Wipe

NOTES

1. Conversion Factor: **1 dpm = 0.45 pCi**
2. "Probe Area (cm²)/100 cm²" not used in MDA equation for Scalers.
3. A map is not required if sufficient detail can be included on this page.
4. Activity for direct (D) measurements corrected for probe area to 100 cm².
5. Swipes obtained over 100 cm² when the accessible surface area an item exceeds 100cm².
6. Ludlum 3030 instruments report results in units of dpm.
7. **Notify RSO when contamination levels exceed 45 pCi/100cm² in uncontrolled areas.**

I³ RADIOLOGICAL SURVEY REPORT CONTINUATION SHEET

| Survey No. | Type (D, S, L) | Inst. ID | Location or Item Description | Gross count rate (cpm) | Net count rate (cpm) | Activity (μCi) | Units |
|------------|----------------|----------|--|------------------------|----------------------|----------------|---------|
| 22 | D | 3 | Old Flange and parts | 10 | -0.95 | -2 | /100cm2 |
| 23 | D | 3 | Lab coats / 5 cloth coats | 20 | 9.05 | 20 | /100cm2 |
| 24 | S | 1 | Movable Cabinet / counter top | 20 | 12.1 | 5 | /swipe |
| 25 | S | 1 | Movable Cabinet / inside top drawer | 7 | -0.9 | 0 | /swipe |
| 26 | S | 1 | Movable Cabinet / inside 2nd drawer | 15 | 7.1 | 3 | /swipe |
| 27 | S | 2 | Movable Cabinet / inside 3rd drawer | 2 | -4.5 | -2 | /swipe |
| 28 | S | 1 | Movable Cabinet / inside 4th drawer | 25 | 17.1 | 8 | /swipe |
| 29 | D | 3 | Movable Cabinet / external surfaces | 10 | -0.95 | -2 | /100cm2 |
| 30 | D | 3 | Wall mounted lock box / FEP 0203 | 10 | -0.95 | -2 | /100cm2 |
| 31 | S | 1 | Wall mounted lock box / FEP 0203 | 10 | 2.1 | 1 | /swipe |
| 32 | D | 3 | Tube Furnace / FEP 0220 | 20 | 9.05 | 20 | /100cm2 |
| 33 | S | 1 | External of Tube Furnace Tube / bottom | 28 | 20.1 | 9 | /swipe |
| 34 | S | 2 | External of Tube Furnace Tube / side | 8 | 1.5 | 1 | /swipe |
| 35 | S | 1 | External of Tube Furnace Tube / side | 28 | 20.1 | 9 | /swipe |
| 36 | S | 2 | External of Tube Furnace Tube / side | 10 | 3.5 | 2 | /swipe |
| 37 | S | 1 | External of Tube Furnace Tube / side | 12 | 4.1 | 2 | /swipe |
| 38 | S | 2 | External of Tube Furnace Tube / top | 10 | 3.5 | 2 | /swipe |
| 39 | S | 1 | External of Tube Furnace Tube / middle | 5 | -2.9 | -1 | /swipe |
| 40 | S | 2 | External of Tube Furnace Tube / top | 2 | -4.5 | -2 | /swipe |
| 41 | D | 3 | External of Tube Furnace Tube / bottom | 80 | 69.05 | 155 | /100cm2 |
| 42 | D | 3 | External of Tube Furnace Tube / middle | 10 | -0.95 | -2 | /100cm2 |
| 43 | D | 3 | Air Pressure gauge and tubing | 15 | 4.05 | 9 | /100cm2 |
| 44 | D | 3 | Hoffman electric wire box & wire | 10 | -0.95 | -2 | /100cm2 |
| 45 | D | 3 | 20 gallon Waste can | 15 | 4.05 | 9 | /100cm2 |
| 46 | S | 1 | 20 gallon Waste can bottom outer surface | 10 | 2.1 | 1 | /swipe |
| 47 | S | 2 | 20 gallon Waste can bottom inner surface | 16 | 9.5 | 4 | /swipe |
| 48 | S | 1 | 20 gallon Waste can Side inner surface | 10 | 2.1 | 1 | /swipe |
| 49 | S | 2 | 20 gallon Waste can Side outer surface | 5 | -1.5 | -1 | /swipe |
| 50 | D | 3 | Wall mounted shelf | 3 | -7.95 | -18 | /100cm2 |
| 51 | D | 3 | Box and Anticontamination suits | 10 | -0.95 | -2 | /100cm2 |
| 52 | S | 1 | Top double bagged 3 ft. Steel half pipe | 0 | -7.9 | -4 | /swipe |
| 53 | S | 2 | Middle double bagged 3 ft. Steel half pipe | 5 | -1.5 | -1 | /swipe |
| 54 | S | 1 | Bottom double bagged 3 ft. Steel half pipe | 5 | -2.9 | -1 | /swipe |
| 55 | D | 4 | Filling Cabinet / FEP 0218 | 5 | -5.95 | -13 | /100cm2 |
| 56 | S | 1 | Top of Filling Cabinet | 7 | -0.9 | 0 | /swipe |
| 57 | S | 2 | Side of Filling Cabinet | 5 | -1.5 | -1 | /swipe |
| 58 | S | 1 | Top Drawer of Filling Cabinet | 2 | -5.9 | -3 | /swipe |
| 59 | S | 2 | Bottom Drawer of Filling Cabinet | 8 | 1.5 | 1 | /swipe |
| 60 | L | 4 | Methanol Bottle | 10 | -0.95 | -2 | /LAW |
| 61 | D | 4 | Methanol Bottle | 5 | -5.95 | -13 | /100cm2 |
| 62 | D | 4 | Clock | 8 | -2.95 | -7 | /100cm2 |
| 63 | L | 4 | Clock | 5 | -5.95 | -13 | /LAW |
| 64 | D | 4 | Office Supplies | 5 | -5.95 | -13 | /100cm2 |
| 65 | L | 4 | Office Supplies | 8 | -2.95 | -7 | /LAW |
| 66 | D | 4 | Scoop | 6 | -4.95 | -11 | /100cm2 |

I³ RADIOLOGICAL SURVEY REPORT CONTINUATION SHEET

| Survey No. | Type (D, S, L) | Inst. ID | Location or Item Description | Gross count rate (cpm) | Net count rate (cpm) | Activity (μCi) | Units |
|------------|----------------|----------|---------------------------------------|------------------------|----------------------|----------------|---------|
| 67 | S | 1 | Scoop | 10 | 2.1 | 1 | /swipe |
| 68 | D | 4 | Acetone Bottle | 10 | -0.95 | -2 | /100cm2 |
| 69 | D | 4 | Plastic Bottles | 4 | -6.95 | -16 | /100cm2 |
| | | | Ventilation Duct in Room 304 | | | | |
| 70 | L | 4 | Inside East Section | 120 | 109.05 | 245 | /LAW |
| 71 | L | 4 | Inside West Section | 60 | 49.05 | 110 | /LAW |
| 72 | L | 4 | Outside East Section | 10 | -0.95 | -2 | /LAW |
| 73 | S | 1 | Inside East Section | 221 | 213.1 | 96 | /swipe |
| 74 | S | 1 | Outside Top Section | 7 | -0.9 | 0 | /swipe |
| 75 | S | 2 | Inside Top section | 338 | 331.5 | 149 | /swipe |
| 76 | S | 1 | Outside bottom Section | 15 | 7.1 | 3 | /swipe |
| 77 | S | 2 | Inside Bottom Section | 193 | 186.5 | 84 | /swipe |
| 78 | S | 1 | East duct outside surface | 12 | 4.1 | 2 | /swipe |
| 79 | S | 2 | East duct outside surface | 13 | 6.5 | 3 | /swipe |
| 80 | S | 1 | East duct outside surface | 5 | -2.9 | -1 | /swipe |
| 81 | L | 4 | East duct outside surface | 38 | 27.05 | 61 | /LAW |
| 82 | D | 4 | West duct outside surface | 20 | 9.05 | 20 | /100cm2 |
| 83 | S | 1 | West duct outside surface | 5 | -2.9 | -1 | /swipe |
| 84 | S | 2 | West duct outside surface | 15 | 8.5 | 4 | /swipe |
| 85 | S | 1 | West duct outside surface | 5 | -2.9 | -1 | /swipe |
| | | | Ventilation Duct on Mezzanine 402 | | | | |
| 86 | S | 1 | Inside Duct furthest from HEPA | 160 | 152.1 | 68 | /swipe |
| 87 | S | 2 | Inside Duct closest to HEPA | 102 | 95.5 | 43 | /swipe |
| 88 | S | 1 | Inside HEPA Unit ustream of filter | 415 | 407.1 | 183 | /swipe |
| 89 | S | 2 | Inside Duct closest to HEPA | 150 | 143.5 | 65 | /swipe |
| 90 | S | 1 | Inside HEPA Unit ustream of filter | 612 | 604.1 | 272 | /swipe |
| 91 | S | 2 | Probe inside Duct | 155 | 148.5 | 67 | /swipe |
| 92 | S | 1 | Floor Under HEPA | 10 | 2.1 | 1 | /swipe |
| 93 | S | 2 | Inside Duct downstream of HEPA filter | 0 | -6.5 | -3 | /swipe |
| 94 | S | 1 | Inside Duct downstream of HEPA filter | 2 | -5.9 | -3 | /swipe |
| 95 | D | 4 | Inside Duct downstream of HEPA filter | 22 | 11.05 | 25 | /100cm2 |
| 96 | S | 1 | Inside Probe opening | 5 | -2.9 | -1 | /swipe |
| 97 | S | 2 | Deep inside probe opening | 10 | 3.5 | 2 | /swipe |
| 98 | S | 1 | Floor under probe opening | 2 | -5.9 | -3 | /swipe |
| | | | | | | | |
| 99 | D | 4 | Duct Braces | 12 | 1.05 | 2 | /100cm2 |
| 100 | D | 4 | Lg storage locker / FEP 0221 | 12 | 1.05 | 2 | /100cm2 |
| 101 | D | 4 | 55 gallon Hot Waste Barrel | 28 | 17.05 | 38 | /100cm2 |
| 102 | S | 1 | 55 gallon Hot Waste Barrel (outside) | 15 | 7.1 | 3 | /swipe |
| 103 | S | 2 | 55 gallon Hot Waste Barrel (inside) | 5 | -1.5 | -1 | /swipe |
| 104 | S | 1 | 55 gallon Hot Waste Barrel (bottom) | 17 | 9.1 | 4 | /swipe |
| 105 | D | 4 | 55 gallon Cold Waste Barrel | 12 | 1.05 | 2 | /100cm2 |
| 106 | S | 1 | 55 gallon Cold Waste Barrel (outside) | 12 | 4.1 | 2 | /swipe |
| 107 | S | 2 | 55 gallon Cold Waste Barrel (inside) | 10 | 3.5 | 2 | /swipe |
| 108 | S | 1 | 55 gallon Cold Waste Barrel (bottom) | 10 | 2.1 | 1 | /swipe |
| 109 | D | 4 | Source Locke Box / FEP 0212 | 14 | 3.05 | 7 | /100cm2 |
| 110 | S | 1 | Source Locke Box / FEP 0212 (outside) | 10 | 2.1 | 1 | /swipe |
| 111 | S | 2 | Source Locke Box / FEP 0212 (inside) | 2 | -4.5 | -2 | /swipe |

