

July 26, 2013

TestAmerica Laboratories, Inc.

U.S. Nuclear Regulatory Commission  
Region III  
ATTN: Materials Licensing Branch  
2443 Warrenville Road, Ste 210  
Lisle, Illinois 60532-4352

Reference: Radioactive Materials License Number 24-24817-01  
TestAmerica Laboratories  
13715 Rider Trail North, Earth City, MO 63045  
License Amendment Request  
Request to Change Radiological Categories Listed in the License

Dear Commission:

We would like to request an amendment to our NRC Radioactive Materials License. The change is administrative in nature and does not affect the scope of the materials, form, or amounts of the license. Updating our standard operating procedures (SOP) to reflect current operations and regulations is driving this request.

First, as a part of a Corporate-wide initiative to supply a better product to our clients and to streamline communications between individual laboratories within our network, a new Laboratory Information Management System (LIMS) has been installed/implemented at the Earth City laboratory. Current SOP's in place at the laboratory reference the prior LIMS by name (QuantIMS), and gives specific directions based upon the prior LIMS. The revised SOP will address the LIMS generically (e.g. as "LIMS"), requiring the same level of control and documentation of radioactive material as the previous LIMS without referencing the new system by name. The intent of this generic reference is to alleviate need for a future amendment if/when an upgrade occurs as technology/programming advances. SOP affected by this update include ST-RP-0031 (Radiation Work Permits) and ST-RP-0050 (Purchase, Receipt, Handling, and Identification of Radioactive Material).

Second, to better reflect current regulations (49 CFR - Transportation), the laboratory is updating defined "rad categories". The purpose of such categories is in part to identify to the user the relative activity level of the sample to help effectively apply ALARA principles. In addition, Category 1 was intended to indicate materials (samples) which are considered "non-radioactive" according to 49 CFR Part 173 (General Requirements for Shipments and Packagings) to aid in proper transfer of such samples to non-licensed facilities when needed.. The original values used for defining Category 1 (which in turn delineate subsequent categories) were rooted in the regulations existing at the time our license was first drafted (~26 years ago). This regulation has changed in the intervening

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years, and the laboratory believes that updating values based upon currently existing regulations is prudent at this time to ensure adherence to such regulation. SOP's affected by this update include ST-RP-0001 (Radiation Protection Program) and ST-RP-0031 (Radiation Work Permits).

While many of the samples received by the laboratory are known/suspected to contain radioactive material, many also originate from projects considered to be "non-Rad". Such samples are expected to contain only naturally occurring radioactive materials (NORM) at environmental levels, and as such a) are not considered radioactive materials by regulations and b) are not expected to pose an exposure risk to the general public. These samples are often received by the Earth City laboratory and subsequently sub-aliquated and sent to another laboratory for additional analyses. Our proposed Category 1 below is intended to reflect exempt quantities of NORM as defined in 49 CFR 173.401 (b) (4). Categories 2 through 4 are subsequently 10 times the value of the previous category, with the additional control of a dose reading:

Category 1:

Gross Alpha activity less than 270 pCi/g

Gross Beta activity less than 2700 pCi/g

Category 2:

Gross Alpha activity greater than or equal to 270 pCi/g but less than 2,700 pCi/g

Gross Beta activity greater than or equal to 2,700 pCi/g but less than 27,000 pCi/g

Dose reading less than 0.1 mR/hr  $\beta$ /g above background on contact

Category 3:

Gross Alpha activity greater than or equal to 2,700 pCi/g but less than 27,000 pCi/g

Gross Beta activity greater than or equal to 27,000 pCi/g but less than 270,000 pCi/g

Dose reading greater than or equal to 0.1 mR/hr  $\beta$ /g above background on contact, but less than 1.0 mR/hr

Category 4:


Gross Alpha activity greater than or equal to 27,000 pCi/g

Gross Beta activity greater than or equal to 270,000 pCi/g

Dose reading greater than or equal to 1.0 mR/hr  $\beta$ /g above background on contact

If you have any questions, please feel free to contact me at (314) 298-8566. Thank you for your help and guidance to implement the changes to the subject license.

Sincerely,



Michael J. Ridenhower

Radiation Safety Officer

TestAmerica Laboratories – St. Louis

From: (314) 298-8566  
Mike Ridenhower  
Test America St. Louis  
13715 RIDER TRAIL NORTH

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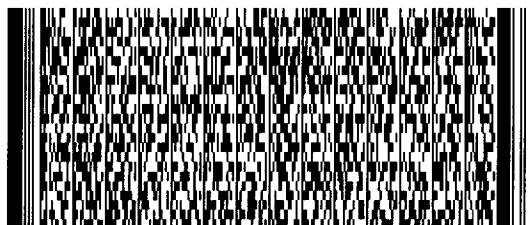
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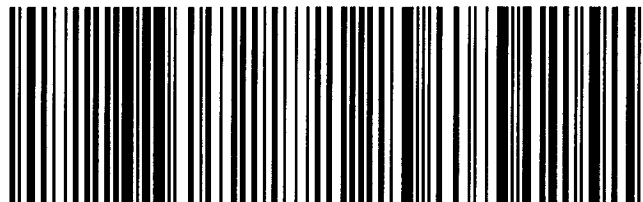


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