

HIGH ENERGY DEVICES

June 13, 2014

Shirley S. Xu
U.S. Nuclear regulatory Commission
Licensing Branch
Division of Materials Safety and State Agreements
Office of Federal and State Materials and
Environmental Management Programs
Washington, DCV 20555-0001

Re: License No.: 24-26366-02E
Docket No. 030-33623
Mail Control No. 583783

Dear Ms. Xu,

Attached is the additional information requested from your letter dated May 19, 2014 requesting that a new application be submitted for this distribution license. You may contact me via e-mail at jkoch@rmwester.com or by phone at 636.928.9628 if you need additional information.

Thank you,



Joseph D. Koch, PhD
Radiation Safety Officer

Enclosures

License Renewal 24-26366-02E
Docek No: 030-33623
Mail Control No: 583783

Item 5. Radioactive Material

Nickel-63 Liquid
Krypton-85 Gas
Cesium-137 Liquid

The electron tubes contain less than one tenth of the limit of Section 30.15 (a)(8) of 10 CFR Part 30. The electron tubes containing Ni-63 and Cs-137 contain 0.4 microCuries each. The electron tubes containing Kr-85 contain 0.5 microCuries each.

Item 6. Purpose for Which Materials Will Be Used

Distribution of Electron Tubes pursuant to Section 32.14, 10 CFR Part 32, "Specific Domestic Licenses to Manufacture or Transfer Certain Items Containing Byproduct Material," to distribute electron tubes containing nickel-63, krypton-85, and cesium-137, to persons exempt from licensing pursuant to Section 30.15, 10 CFR 30, or equivalent provisions of the regulations of Any Agreement State.

Item 7. Individual(s) Responsible for Radiation Safety Program

Previously submitted

Item 8. Training For Individuals Working In or Frequenting Restricted Areas

The following topics are covered during training for authorized users:

1. Review of License Conditions
2. Review of Posted Notices
3. Principals for keeping exposures ALARA
4. Housekeeping
5. Performing Surveys
6. Operations of scaler
7. Emergency Spill procedures
8. Waste Management

Item 9. Facilities and Equipment

The facility is locked and can only be accessed using a key or being "buzzes" in during the day. There are sufficient survey meters and scalers which are calibrated annually for the types of radioactive material handled.

Item 10. Radiation Safety Program

A. General

1. Disposable gloves must be worn when working with radioactive components until they have been sealed.
2. Smoking, eating, drinking and applying cosmetics is prohibited in any areas where radioactive materials are handled or stored.
3. Thoroughly wash hands upon leaving any and all areas where radioactive materials are handled and stored.

B. Hot Lab (In addition to the general regulations listed above)

1. Only the RSO, Department Managers, and authorized users (spotters) may enter the hot lab.
2. A lab coat and disposable gloves must be worn while spotting components, including preparation and clean up.
3. During spotting, the sliding front door on the fume hood may be opened no higher than the position indicated with the tape. After spotting and clean up, the door will be closed.
4. The absorbent paper pads on the spotting bench will be replaced with new pads after spotting. Used absorbent pads and disposable gloves will be placed into the radioactive waste receptacles.
5. Hands shall be thoroughly washed after leaving the spotting lab.
6. Any person leaving the hot lab shall monitor their hands, shoes and their lab coat with the survey meter located at the entrance to the hot lab. In the case of a reading above 0.05 mR/hr, clean the affected area until the reading is at the background level.

C. Emergency Spill Procedure

In the event of a spill of radioactive material, follow this procedure:

1. NOTIFY: Notify persons in the area that a spill has occurred.
2. PREVENT THE SPREAD: Cover the spill with absorbent paper.
3. CLEAN UP: Use disposable gloves and remote handling tongs. Carefully fold the absorbent paper, insert into a plastic bag and place in the radioactive waste container. Place any other contaminated items, such as gloves, and paper towels, into a plastic bag and place in the radioactive waste container.
4. SURVEY: Survey the area with the appropriate radiation monitor. Check the spill area, hands, and clothing for contamination. Clean as required.
5. REPORT: Report the incident immediately to the RSO so that follow up surveys and reports can be completed.

Item 11. Waste Management

All wastes are accumulated in the proper marked receptacles and are disposed utilizing a licensed waste broker. All records of waste disposal of radioactive materials will be kept as required.

Additional Information

QA/QC Program

The amount of radioactivity that is contained in the finished product is controlled by the concentration of the liquid and the ratcheting micro-syringe. If an authorized user gets less than the proper number of spots from the applicator, then that lot of spotted glass tubes is to be scrapped and placed into the radioactive waste container. The RSO is to be notified and the determination of the cause of the discrepancy is to be made. No further spotting is to be performed until the corrective action is implemented. These procedures are posted in the Hot Lab area and will be covered in initial training and yearly review training for authorized users.

Product Labeling

All products are labeled as follows:

HIGH ENERGY DEVICES, LLC
BYPRODUCT MATERIAL Ni63
PO#
PART#
1PC

HIGH ENERGY DEVICES, LLC
BYPRODUCT MATERIAL Kr85
PO#
PART#
1PC

HIGH ENERGY DEVICES, LLC
BYPRODUCT MATERIAL Cs137
PO#
PART#
1PC

HIGH ENERGY DEVICES

LLC

Radioactive Materials Distributed in 2013

| YEAR / 2013 | Material License 030-33623-02E | | | |
|-------------|--------------------------------|-----------------|---------------|-----------------|
| MONTH | | | | |
| | <u>PART #</u> | <u>QTY/Ni63</u> | <u>QTY/Cs</u> | <u>QTY/Kr85</u> |
| JANUARY | TB2.5 | 3 | | |
| | TG131 | 2 | | |
| FEBRUARY | TG131 | 2 | | |
| | TD29 | | | 10 |
| | TB15.0 | 1 | | |
| | UFT266-1-900 | 5 | | |
| | TG376 | 2 | | |
| MARCH | | 0 | | |
| APRIL | TG153 | 2 | | |
| | TG87 | 10 | | |
| | PMT(301)350 | 15 | | |
| MAY | TG73 | 13 | | |
| | UFT266-1-900 | 20 | | |
| | PMT(301)2.0 | 40 | | |
| | TG373 | 10 | | |
| | TA7.0 | 25 | | |
| | PMT(301)350 | 2 | | |
| JUNE | PMT(301)2.0 | 87 | | |
| | PMT(301)350 | 20 | | |
| | PMT(301)400 | 15 | | |
| | TB25.0 | 10 | | |
| JULY | TG100 | 1 | | |
| | TG249 | 5 | | |

HIGH ENERGY DEVICES

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| | | | | |
|------------------|--------------|-------------|-----------|-------------|
| | UMT(279)1.7 | 51 | | |
| | TG73 | 1 | | |
| | PMT(301)750 | 2 | | |
| | PMT(301)1.1 | 2 | | |
| | PMT(301)2.0 | 2 | | |
| | TG59 | 3 | | |
| AUGUST | | | | |
| | TG73 | 3 | | |
| | TA5.0 | 3 | | |
| | BX2.0 | 3 | | |
| SEPTEMBER | | | | |
| | PMT(301)2.0 | 38 | | |
| | BX2.0 | 30 | | |
| | TG65 | 5 | | |
| OCTOBER | | | | |
| | SB600 | 3 | | |
| | BX2.5 | 100 | | |
| | UFT266-1-900 | 7 | | |
| | TG194 | 3 | | |
| | TB4.5 | 1 | | |
| | BX2.5 | 5 | | |
| | BX10.0 | 5 | | |
| | BX15.0 | 5 | | |
| NOVEMBER | | | | |
| | TG153 | 3 | | |
| | UFT266-2-900 | 12 | | |
| DECEMBER | | | | |
| | UMT(279)1.7 | 16 | | |
| TOTALS | | Ni63 | Cs | Kr85 |
| | | 593 | | 10 |

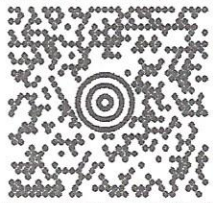
BARBARA NACKE
636-928-9628
R M WESTER & ASSOC
215 INDACOM DR
ST PETERS MO 63376

0.0 LBS LTR

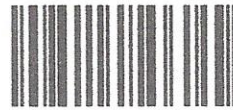
1 OF 1

SHIP TO:

SHIRLEY XU
301-415-7640
US NRC LICENSING BRANCH
11555 ROCKVILLE PIKE
DIVISION MATERIAL SAFETY
OFFICE OF FEDERAL & STATE MATERIALS
ROCKVILLE MD 20852



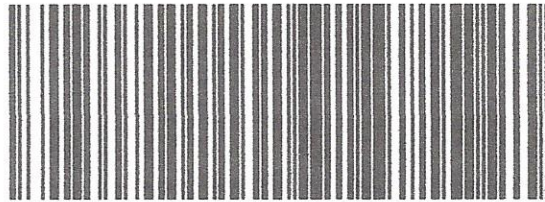
MD 207 9-78



UPS 2ND DAY AIR

TRACKING #: 1Z E19 9W2 02 9908 2277

2



BILLING: P/P

Trx Ref No.: Shipment Reference #1
Trx Ref No.: Shipment Reference #2

XOL 14.03.05

NV45 51.0A 04/2014



UNISHIPPERS