



Agilent Technologies

2850 Centerville Road
Wilmington, DE 19808

September 9, 2015

07-28762-01
030-32792

Director
U.S. Nuclear Regulatory Commission
Region 1
2100 Renaissance Blvd, Suite 100
King of Prussia, PA 19406-2713

Re: Licensee Cessation of personnel monitoring

Dear Sir or Madam,

In a letter dated September 25, 2000 (copy attached), Agilent Technologies, Inc. (Agilent) notified the NRC of a change in its health monitoring program, switching from urinalysis testing to dosimeter badges. We also described that, though calculated and monitored results indicating that the potential exposure from Nickel 63 was far below the standard set forth in 10 CFR20.1502 [i.e., less than 10% of the limits set forth in 10 CFR 20.1201(a)], exempting us from any requirement to monitor. However, Agilent would continue to perform periodic monitoring for risk management and employee peace of mind.

Agilent performed monitoring one quarter per year on its employees working with open sources. Since then, the highest reported exposures were a 3 mRem shallow dose and a 5 mRem eye dose exposure with the majority of monitoring results being below detector limits. With the shut down and transfer of the manufacturing operation to Agilent's site in Shanghai, China, in May of 2014, all routine exposure to open sources was terminated. The only functions remaining at the Wilmington, DE site are installation of completed ECDs into gas chromatograph instruments for customer orders, customer to customer ECD transfers, and disposal. As there remains no potential for exposure to open sources on a routine basis, Agilent has determined to terminate its monitoring program for ECDs.

Please contact me as shown below if you have any questions associated with this notice or David Bennett (RSO) at 302-636-8262 if you have any technical questions.

Sincerely,

David Hoppy, CHMM, CDGP
EHS Manager, Eastern Region
2850 Centerville Road
Wilmington, DE 19808
302-636-3757 (T)
302-636-3904 (FAX)
David_hoppy@agilent.com

588924

NISS/IGNI MATERIALS-002



Director
Division of Nuclear Materials Safety
U.S. Nuclear Regulatory Commission
Region I
475 Allendale Road,
King of Prussia, PA 19406

Re: Amendment to License 07-28762-01

September 25, 2000

Dear Sir or Madam,

This amendment refers to the health monitoring described to the NRC in an amendment letter dated October 19, 1992. In that letter, the health monitoring program was described as consisting of urinalysis monitoring, searching for the presence of tritium (H_3) and nickel 63 (^{63}Ni). Tritium sources are no longer manufactured or serviced by this facility and we feel that a periodic dosimeter badge program would be more efficient in monitoring for real exposure than urine sampling. We believe that dosimeter monitoring is superior to urine sampling for the following reasons:

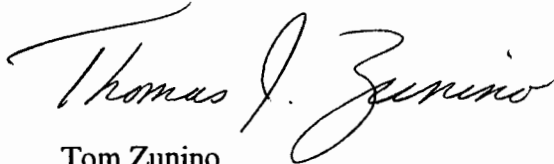
1. Urine sampling provides a picture of internal exposure only for approximately 48 hours prior to the sample being taken. Dosimeter badges provide cumulative exposure data for an entire time period (typically over 3-month increments).
2. Urine sampling is invasive to employee privacy and dignity. Dosimeter badge monitoring avoids any level of discomfort to employee sensitivity as badges are clipped to external clothing.
3. Urine sampling also presents a personal hygiene problem in that sample bottles can have external urine residues that could be transferred if proper procedures are not followed.

Calculated and monitored results indicate that the potential exposure from ^{63}Ni is far below the standard set forth in 10 CFR 20.1502 (Conditions requiring individual

monitoring of external and internal occupational dose). Though this would exempt us from performing employee monitoring, we desire to continue to monitor for risk management reasons and employee peace of mind, but with the change described above.

Please contact me at 302-633-8071 if there are any concerns.

Thank you,

A handwritten signature in black ink that reads "Thomas J. Zunino". The signature is written in a cursive style with a large, sweeping initial "T".

Tom Zunino
Work Place Services Manager