

RADIOACTIVE MATERIAL LICENSE

Pursuant to the California Code of Regulations, Division 1, Title 17, Chapter 5, Subchapter 4, Group 2, Licensing of Radioactive Material, and in reliance on statements and representations heretofore made by the licensee, a license is hereby issued authorizing the licensee to receive, use, possess, transfer, or dispose of radioactive material listed below; and to use such radioactive material for the purpose(s) and at the places(s) designated below. This license is subject to all applicable rules, regulations, and orders of the California Department of Public Health now or hereafter in effect and to any standard or specific condition specified in this license.

1. Licensee:	Campbell/ Harris Security Equipment Company	3. License Number:	4147-01	Amendment Number : 25
2. Address:	875-A Island Drive #356 Alameda, CA 94502-6768	4. Expiration date:	February 17, 2019	(5)
Attention:	Anthony Harris Radiation Safety Officer	5. Inspection agency:	Radiologic Health Branch North	

In response to the letter received on July 18, 2016, signed by Anthony Harris, President and Radiation Safety Officer, License Number 4147-01 is hereby amended as follows:

6. Nuclide	7. Form	8. Possession Limit
A. Cobalt-57	A. Sealed source (New England Nuclear LE 316)	A. One source not to exceed 37 megabecquerels (1 millicurie).
B. Cesium-137	B. Sealed source (Amersham CDC-700)	B. One source not to exceed 37 megabecquerels (1 millicurie).
C. Americium-241	C. Sealed source (Amersham AMC.D2)	C. One source not to exceed 37 megabecquerels (1 millicurie).
D. Cobalt-60	D. Sealed source, manufactured, labeled, packaged, and distributed in accordance with a specific license issued to the manufacturer by the U.S. Nuclear Regulatory Commission or an Agreement State.	D. One source not to exceed 37 megabecquerels (1 millicurie).
E. Barium-133	E. Sealed sources (Amersham BDC 700 Dupont NER-474 or IPL Models 225, GFS and A3902)	E. 200 sources not to exceed 37 megabecquerels (1 millicurie) each. Total not to exceed 7.4 gigabecquerels (200 millicuries).
F. Barium-133	F. Sealed sources, manufactured and distributed in accordance with a specific license issued to the manufacturer by the U.S. Nuclear Regulatory Commission or an Agreement State.	F. 50 sources not to exceed 37 megabecquerels (1 millicurie) each. Total not to exceed 1.9 gigabecquerels (50 millicuries).
G. Cobalt-57	G. Sealed sources, manufactured and distributed in accordance with a specific license issued to the manufacturer by the U.S. Nuclear Regulatory Commission or an Agreement State.	G. 50 sources not to exceed (37 megabecquerels) 1 millicurie each. Total not to exceed 1.9 gigabecquerels (50 millicuries).
H. Barium-133	H. Sealed sources (IPL Model A 3902)	H. 100 sources not to exceed 407 kilobecquerels (11 microcuries) each. Total not to exceed 40.7 megabecquerels (1.1 millicurie).

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- A.-D. To be used as components in the development of prototype gauges.
- E. To be used as components for the manufacture, and development of prototype gauges, demonstration, training, maintenance, and distribution of K series gauges to specific licensees of the NRC or Agreement States.
- F. & G. To be used as components of gauges for storage and disposal.
- H. To be used for manufacture, development, demonstration, training and maintenance of K9 series gauges. Distribution authorized under NRC exempt distribution license number 04-35303-01E.**

LICENSE CONDITIONS

10. Radioactive material shall be used only at the following locations:
- (a) 2209 Harbor Bay Pkwy, Alameda, CA
 - (b) Temporary job sites of the licensee in areas not under exclusive federal jurisdiction throughout the State of California (**Condition 21**).
11. This license is subject to an annual fee for sources of radioactive material authorized to be possessed at any one time as specified in Items 6, 7, 8 and 9 of this license. The annual fee for this license is required by and computed in accordance with Title 17, California Code of Regulations, Sections 30230-30232 and is also subject to an annual cost-of-living adjustment pursuant to Section 100425 of the California Health and Safety Code.
12. Radioactive material shall be used by, or under the supervision and in the physical presence of, the following individuals:
- (a) Patrick J. Campbell
 - (b) Gregory Nelson
 - (c) Anthony Harris
 - (d) Douglas Broadwell
13. Except as specifically provided otherwise by this license, the licensee shall possess and use radioactive material described in Items 6, 7, 8 and 9 of this license in accordance with the statements, representations, and procedures contained in the documents listed below. The Department's regulations shall govern unless the statements, representations, and procedures in the licensee's application and correspondence are more restrictive than the regulations.
- (a) The letter and application dated February 13, 1998, with attachments, signed by Patrick J. Campbell; as modified by the letters both dated March 15, 1999, one with attachments, signed by Patrick J. Campbell.
 - (b) The short form renewal application with attachments, clarifying previous requests, dated May 5, 2008 and previously submitted requests dated December 10, 2007, regarding change of addresses and January 21, 2008, regarding the addition of a new site.
 - (c) The correspondence dated June 12, 2008, signed by Patrick J. Campbell, Owner and Anthony Harris, Buyer, regarding the change in ownership.
 - (d) The letter with attachments dated March 3, 2009, signed by Patrick Campbell, Alternate Radiation Safety Officer, regarding the release of the facility located at 5046-D Commercial Circle, Concord, CA for unrestricted use.

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14. (a) The Radiation Safety Officer in this program shall be Anthony Harris.
- (b) The Alternate Radiation Safety Officer in this program at the shall be Gregory Nelson and Douglas Broadwell
15. Sealed sources possessed under this license shall be tested for leakage and/or contamination as required by Title 17, California Code of Regulations, Section 30275 (c).
16. Quantitative analytical assays for the purpose of tests for leakage and/or contamination of sealed sources shall be performed only by persons specifically authorized to perform that service.
17. The following individuals are authorized to collect wipe test samples of sealed sources possessed under this license using leak test kits acceptable to the California Department of Public Health:
 - (a) The Radiation Safety Officer
 - (b) Qualified individuals designated in writing by the Radiation Safety Officer
18. Records of leak test results shall be kept in units of microcuries and maintained for inspection. Records may be disposed of following Department inspection. Any leak test revealing the presence of 0.005 microcuries or more of removable radioactive material shall be reported to the California Department of Public Health, Radiologic Health Branch, MS 7610, P.O. Box 997414, Sacramento, CA 95899-7414, within five days of the test. This report shall include a description of the defective source or device, the results of the test, and the corrective action taken.
19. The licensee shall distribute only sealed sources and/or devices for which a Sealed Source and Device Registry Certificate has been issued by the California Department of Health Services, the U.S. Nuclear Regulatory Commission, or other Agreement State. Sealed sources and/or devices distributed must adhere to the design specifications described in the Sealed Source and Device Registry Certificate. Any changes in the design or specifications of these sealed sources and/or devices require the manufacturer to apply for and receive an amendment to the Sealed Source and Device Registry Certificate prior to distribution. The licensee may distribute sources and/or devices without a Sealed Source and Device Registry Certificate provided the recipient is authorized to possess such items by license condition or applicable State or Federal regulations and laws.
20. This license does not authorize distribution of radioactive material pursuant to Title 17, California Code of Regulations, Sections 30180 and 30192 through 30192.6 or equivalent provisions of the U.S. Nuclear Regulatory Commission or Agreement States.
21. Before radioactive materials may be used at a temporary job site at any federal facility, the jurisdictional status of the job site must be determined. If the jurisdictional status is unknown, the federal agency should be contacted to determine if the job site is under exclusive federal jurisdiction. A response shall be obtained in writing or a record made of the name and title of the person at the federal agency who provided the determination and the date that it was provided. Authorization for use of radioactive materials at the job sites under exclusive federal jurisdiction shall be obtained either by:
 - (a) Filing an NRC Form-241 in accordance with the Code of Federal Regulations, Title 10, Part 150.20 (b), "Recognition of Agreement State Licenses", or
 - (b) By applying for a specific NRC license.

Before radioactive material can be used at a temporary job site in another State, authorization shall be obtained from the State if it is an Agreement State, or from the NRC for any non-Agreement State, either by filing for reciprocity or applying for a specific license.

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22. Except for alpha sources, the periodic leak test required by Condition 15 does not apply to sealed sources that are stored and not being used. The sources excepted from this test shall be tested for leakage prior to any use or transfer to another person unless they have been leak tested within six months prior to the date of use or transfer.
23. The licensee shall conduct a physical inventory every six months to account for all sealed sources and/or devices received and possessed under the license. Records of the inventories shall be maintained for inspection, and may be disposed of following Department inspection.
24. **At least 30 days prior to vacating any address of use listed in Condition 10 of this license, the licensee shall provide written notification of intent to vacate to the California Department of Public Health, in accordance with Title 17, California Code of Regulations, Section 30256 (b). Control of all licensed areas must be maintained until such areas are released by the Department for unrestricted use or the license is terminated, in accordance with Title 17, California Code of Regulations, Section 30256 (j).**
25. A copy of this license and a copy of all records and documents pertaining to this license shall be maintained available for inspection at 2209 Harbor Bay Pkwy, Alameda, CA.
26. The licensee will provide the Low Level Radioactive Waste (LLRW) reports specified in the California Health and Safety Code section 115000.1(h) to the California Department of Public Health (CDPH) on an annual basis for both shipped and stored LLRW. Alternatively, LLRW shipment information may be provided on a per shipment basis. LLRW shipment information and annual reports shall be mailed to:

Attn: LLRW Tracking Program
California Department of Public Health
Radiologic Health Branch MS 7610
P.O. Box 997414
Sacramento, CA 95899-7414

For the California Department of Public Health

Date: August 26, 2016

By: 

Ronald Rogus
Senior Health Physicist
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