



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION I
2100 RENAISSANCE BLVD.
KING OF PRUSSIA, PA 19406-2713

April 5, 2017

Docket No.: 03036194

License No.: 52-25617-01 (expired)

EA-16-255

Frank Kolodziej Castro, M.D.
President and Owner
Somascan, Incorporated
Ashford Avenue 888 PH
San Juan, Puerto Rico 00907

SUBJECT: NOTICE OF VIOLATION AND PROPOSED CIVIL PENALTY \$7,000 –
SOMASCAN, INC., NRC INSPECTION REPORT NO. 03036194/2014001

Dear Dr. Kolodziej:

This letter provides you the U.S. Nuclear Regulatory Commission's (NRC's) enforcement decision for the apparent violations identified during routine inspections conducted between December 10, 2014, and November 16, 2016, at Somascan, Incorporated (Somascan) in San Juan, Puerto Rico. The inspections were conducted to examine the activities under your NRC license as they relate to public health and safety and to compliance with NRC rules and regulations. The NRC discussed the apparent violations during a telephonic exit meeting on January 30, 2017, with your consultant Mr. David Rhoe. The apparent violations were also described in the NRC inspection report sent to you with a letter dated February 13, 2017 (ML17045A536)¹.

In the February 13, 2017, letter transmitting the inspection report, we informed you that the apparent violations were being considered for escalated enforcement action. In the letter, we provided you the opportunity to address the apparent violations identified in the report by either attending a pre-decisional enforcement conference (PEC), engaging the NRC in Alternative Dispute Resolution (ADR), or providing a written response before we made our final enforcement decision. Since you have not responded to our letter, the NRC is proceeding with its enforcement action.

Based on the information developed during the inspection, the NRC has determined that violations of NRC requirements occurred. The violations are cited in the enclosed Notice of Violation and Proposed Imposition of Civil Penalty (Notice).

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

¹ Designation in parentheses refers to an Agency-wide Documents Access and Management System (ADAMS) accession number. Documents referenced in this letter are publicly-available using the accession number in ADAMS.

The violations involve Somascan's failures to notify the NRC of its license expiration, to begin and complete decommissioning of its site, and to secure from unauthorized removal or access licensed material that is stored in an unrestricted area. Although these failures were described as separate apparent violations in the February 13, 2017, letter, we are citing the decommissioning violations and the security violation together as a single problem, to emphasize the common root cause as being Somascan's failure to properly control and remediate its facility.

In assessing the significance of this problem, the NRC considered that the decommissioning timeliness requirements are intended to reduce potential risk to the public and environment that may result from delayed decommissioning of inactive facilities and sites. Somascan has not completed decommissioning or engaged in meaningful communication with the NRC regarding plans to remediate its site. Additionally, the NRC considered that Somascan's failure to secure licensed material has resulted in the potential for unauthorized personnel to have access to, and potentially remove, the material, which could result in unplanned radiation exposure to members of the public. Based on these considerations, the NRC has assessed this problem at Severity Level (SL) III, in accordance with the NRC Enforcement Policy.

In accordance with the NRC Enforcement Policy, a base civil penalty in the amount of \$7,000 is considered for a SL III problem. Because your facility has not been the subject of escalated enforcement actions within the last two inspections, the NRC considered whether credit was warranted for Corrective Action in accordance with the civil penalty assessment process in Section 2.3.4 of the Enforcement Policy. The NRC staff determined that credit for corrective action is not warranted because Somascan has failed to take any action to address the violations. Therefore, to emphasize the importance of compliance with NRC requirements, I have been authorized, after consultation with the Director, Office of Enforcement, to issue the enclosed Notice and Proposed Imposition of Civil Penalty in the base amount of \$7,000. In addition, issuance of this Notice constitutes escalated enforcement action that may subject you to increased inspection effort.

The NRC's primary interest in this matter is to ensure that Somascan meets its obligation to decommission its facility and ensure the proper transfer or disposal of licensed material in its possession. Accordingly, the NRC will not impose the \$7,000 civil penalty at this time if Somascan completes the following actions:

1. Within 30 days of the date of this letter, properly dispose of or transfer all sealed radioactive sources possessed by Somascan, and send the following information documenting that the material has been transferred or disposed of to the Regional Administrator, NRC Region I, 2100 Renaissance Blvd, King of Prussia, PA 19406: (a) a completed NRC Form 314 (enclosed); (b) a copy of the certification from the authorized recipient that the material has been received; and (c) a copy of the radiation survey performed in accordance with 10 CFR 30.36(j)(2), or
2. Within 60 days of the date of this letter, submit to the Regional Administrator, NRC Region I, 2100 Renaissance Blvd, King of Prussia, PA 19406, a written description of the planned activities to complete decommissioning of the Somascan site and a schedule for their completion (i.e., a decommissioning plan).

If Somascan completes one of the actions described above, the NRC will forgo imposition of any civil penalty. However, if Somascan does not complete one of the above actions, the NRC

will impose the \$7,000 civil penalty and will consider the imposition of additional daily civil penalties that would continue to be assessed until Somascan addresses the violations by taking action to decommission its site. Please contact Mr. James P. Dwyer, Chief, Medical Branch, at 610-337-5309 within **10** days of the date of this letter notifying the NRC of which action Somascan plans to take.

If you disagree with this enforcement sanction, you may deny the violation, as described in the Notice, or you may request ADR with the NRC in an attempt to resolve this issue. ADR is a general term encompassing various techniques for resolving conflicts using a neutral third party. The technique that the NRC has decided to employ is mediation. Mediation is a voluntary, informal process in which a trained neutral individual (the "mediator") works with parties to help them reach resolution. If the parties agree to use ADR, they select a mutually agreeable neutral mediator who has no stake in the outcome and no power to make decisions. Mediation gives parties an opportunity to discuss issues, clear up misunderstandings, be creative, find areas of agreement, and reach a final resolution of the issues. Additional information concerning the NRC's ADR program can be found at <http://www.nrc.gov/about-nrc/regulatory/enforcement/adr.html>.

The Institute on Conflict Resolution (ICR) at Cornell University has agreed to facilitate the NRC's program as a neutral third party. If you are interested in pursuing this issue through the ADR program, please contact: (1) the ICR at (877) 733-9415; and (2) Jim Dwyer, Chief, Medical Branch at 610-337-5309 within 10 days of the date of this letter. You may also contact both ICR and Mr. Dwyer for additional information. Your submitted signed agreement to mediate using the NRC ADR program will stay the 60-day time period for payment of the civil penalties and the required written response, as identified in the enclosed notice, until the ADR process is completed.

You are required to respond to this letter and to follow the instructions specified in the enclosed Notice when preparing your response. If you have additional information that you believe the NRC should consider, you may provide it in your response to the Notice. The NRC will use your response, in part, to determine whether further enforcement action is necessary to ensure compliance with regulatory requirements. In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice," a copy of this letter, its enclosure, and your response will be made available electronically for public inspection in the NRC Public Document Room or in the NRC's Agency-wide Documents Access and Management System (ADAMS), accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html>.

The NRC also includes significant enforcement actions on its Web site at <https://www.nrc.gov/reading-rm/doc-collections/enforcement/actions/>).

Sincerely,

A handwritten signature in black ink, appearing to read 'D. Dorman', with a long horizontal flourish extending to the right.

Daniel H. Dorman
Regional Administrator

Enclosures:

1. Notice of Violation and Proposed Imposition of Civil Penalty
2. NUREG/BR-0254, "Payment Methods"
3. NRC Form 314, "Certificate of Disposition of Materials"

cc w/enclosures:

Mr. David M. Rhoel, Consultant
Commonwealth of Puerto Rico

ENCLOSURE 1

NOTICE OF VIOLATION
AND
PROPOSED IMPOSITION OF CIVIL PENALTY

Somascan, Inc.
Hato Rey, Puerto Rico

Docket No.: 03036194
License No.: 52-25617-01 (expired)
EA-16-255

During an NRC inspection conducted between December 10, 2014, and November 16, 2016, violations of NRC requirements were identified. In accordance with the NRC Enforcement Policy, the NRC proposes to impose a civil penalty pursuant to Section 234 of the Atomic Energy Act of 1954, as amended (Act), 42 U.S.C. 2282, and 10 CFR 2.205. The particular violations and associated civil penalty are set forth below:

- A. 10 CFR 30.36(d) requires in part that, within 60 days of a license expiration, a licensee shall provide notification to the NRC in writing of such occurrence and either begin decommissioning its site or submit within 12 months of the notification, a decommissioning plan if required by §30.36(g)(1), and begin decommissioning upon approval of that plan.

10 CFR 30.36(h) requires, in part, that a licensee complete decommissioning of its site as soon as practicable but no later than 24 months following the initiation of decommissioning, unless the NRC has approved an alternative decommissioning schedule.

Contrary to the above, as of June 29, 2015, Somascan, Inc. (Somascan) did not provide notification to the NRC in writing and begin decommissioning its site so that the site is suitable for release in accordance with NRC requirements and did not complete decommissioning within 24 months following the initiation of decommissioning. Specifically, Somascan's license expired on April 30, 2013, and Somascan did not notify the NRC in writing within 60 days of license expiration, or June 29, 2013, of its plan to decommission and begin decommissioning its site. Additionally, to date, the licensee has not notified NRC of its plan to decommission and has not completed decommissioning of the site.

- B. 10 CFR 20.1801 requires that a licensee secure from unauthorized removal or access licensed materials that are stored in controlled or unrestricted areas.

Contrary to the above, as of November 21, 2012, Somascan did not secure from unauthorized removal or access licensed material that was stored in a controlled or unrestricted area. Specifically, a 20 millicurie cesium-137 sealed source was stored inside of a PET/CT camera located within a Somascan facility and, since November 21, 2012, when an eviction order was issued, Somascan has had no direct control over access to the facility or the sealed source.

This is a Severity Level III problem (Enforcement Policy Section 6.3)
Civil Penalty - \$7,000

Pursuant to the provisions of 10 CFR 2.201, Somascan, Inc. (Licensee) is hereby required to submit a written statement or explanation to the Director, Office of Enforcement, U.S. Nuclear Regulatory Commission, with a copy to the Document Control Desk, Washington, DC 20555-0001, within 30 days of the date of this Notice of Violation and Proposed Imposition of Civil Penalty (Notice). This reply should be clearly marked as a "Reply to a Notice of Violation; (EA-16-255)" and should include for each alleged violation: (1) the reason for the violation, or, if contested, the basis for disputing the violation or severity level; (2) the corrective steps that have been taken and the results achieved; (3) the corrective steps that will be taken; and (4) the date when full compliance will be achieved.

Your response may reference or include previous docketed correspondence, if the correspondence adequately addresses the required response. If an adequate reply is not received within the time specified in this Notice, the NRC may issue an order or a Demand for Information requiring you to explain why the NRC should not take action as may be proper. Consideration may be given to extending the response time for good cause shown.

The Licensee may pay the civil penalty proposed above in accordance with NUREG/BR-0254 and by submitting to the Director, Office of Enforcement, U.S. Nuclear Regulatory Commission, a statement indicating when and by what method payment was made, or may protest imposition of the civil penalty in whole or in part, by a written answer addressed to the Director, Office of Enforcement, U.S. Nuclear Regulatory Commission, within 30 days of the date of this Notice. Should the Licensee fail to answer within 30 days of the date of this Notice, the NRC will issue an order imposing the civil penalty. Should the Licensee elect to file an answer in accordance with 10 CFR 2.205 protesting the civil penalty, in whole or in part, such answer should be clearly marked as an "Answer to a Notice of Violation" and may: (1) deny the violation listed in this Notice, in whole or in part; (2) demonstrate extenuating circumstances; (3) show error in this Notice; (4) submit a written description of the decommissioning activities and planned schedule for completion as described in the letter enclosing this Notice, or (5) show other reasons why the penalty should not be imposed. In addition to protesting the civil penalty in whole or in part, such answer may request remission or mitigation of the penalty.

In requesting mitigation of the proposed penalty, the response should address the factors addressed in Section 2.3.4 of the Enforcement Policy. Any written answer addressing these factors pursuant to 10 CFR 2.205 should be set forth separately from the statement or explanation provided pursuant to 10 CFR 2.201, but may incorporate parts of the 10 CFR 2.201 reply by specific reference (e.g., citing page and paragraph numbers) to avoid repetition. The attention of the Licensee is directed to the other provisions of 10 CFR 2.205 regarding the procedure for imposing a civil penalty.

Upon failure to pay any civil penalty which subsequently has been determined in accordance with the applicable provisions of 10 CFR 2.205 to be due, this matter may be referred to the Attorney General, and the penalty, unless compromised, remitted, or mitigated, may be collected by civil action pursuant to Section 234c of the Act, 42 U.S.C. 2282c.

The responses noted above, i.e., Reply to Notice of Violation, Statement as to payment of civil penalty, and Answer to a Notice of Violation, should be addressed to: Patricia Holahan, Director, Office of Enforcement, U.S. Nuclear Regulatory Commission, One White Flint North, 11555 Rockville Pike, Rockville, MD 20852-2738, with a copy to the Regional Administrator, U.S. Nuclear Regulatory Commission, Region I, 2100 Renaissance Boulevard, King of Prussia, PA, 19406, and the Document Control Center, Washington, DC 20555-0001.

Dated this 5th day of April, 2017

FedEx or overnight mailings must be delivered to:

U.S. Nuclear Regulatory Commission
U.S. Bank Government Lockbox
SL-MO-026L
1005 Convention Plaza
St. Louis, MO 63101

TAXPAYER IDENTIFICATION NUMBER

You must file your Taxpayer Identification Number with the NRC. NRC Form 531 can be viewed and printed from the NRC Web site at <http://www.nrc.gov>. Select NRC Library> Document Collections> Forms> Forms (NRC). You can also obtain a form by calling the Accounts Receivable Help Desk at (301) 415-7554.

FOR INFORMATION

The Office of the Chief Financial Officer will promptly respond to all requests for information. Please contact the office at:

U.S. NUCLEAR REGULATORY COMMISSION
OCFO/DOC/ARB
Mail Stop 19-E-10
Washington, DC 20555-0001
PH (301) 415-7554
E-mail FEES.Resource@nrc.gov



Payments Methods

U.S. NUCLEAR REGULATORY COMMISSION

OCFO/DOC/ARB
Mail Stop 19-E-10
Washington, DC 20555-0001
PH (301) 415-7554

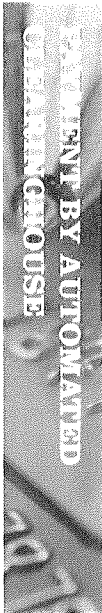


NUREG/BR-0254, Rev. 7
July 2015



Estimated burden per response to comply with this voluntary collection request: 5 minutes. This collection solicits information that will allow the respondent to transfer funds electronically. Forward comments regarding burden estimate to the Records Management Branch (T-6 F33), U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001, and to the Paperwork Reduction Project (3150-0190), Office of Management and Budget, Washington, DC 20503. If a means used to impose an information collection does not display a currently valid OMB control number, the NRC may not conduct or sponsor, and a person is not required to respond to, the information collection.

The following are payment methods accepted by the NRC for payment of an annual fee, a proposed or imposed civil penalty, a full cost licensing or inspection invoice, an application fee, a revision to a reciprocity application, a registration fee, or other fees.



The Automated Clearinghouse / Electronic Data Interchange (ACH/EDI) Network is a highly reliable and efficient nationwide batch-oriented electronic funds transfer system. The ACH/EDI is governed by operating rules that provide for the interbank clearing of debit and credit transactions and for the exchange of information among participating financial institutions.

A growing number of transactions involving the collection of funds by Federal agencies are being made through the ACH/EDI. The Federal government is the largest single user of the ACH/EDI, originating and receiving millions of transactions each month. At the NRC, collections via the ACH/EDI have been increasing each year since 1996.

ACH offers several advantages over checks:

- * Provides automatic bill payment
- * Eliminates postage fees
- * Eliminates lost checks
- * Reduces transaction time
- * Reduces check writing and reconciliation fees
- * Least expensive of all electronic collection systems
- * Both payment and refunds (debits and credits) can be processed through the ACH/EDI Network

To respond to the growing needs of companies to electronically send payment information as well as payments between trading partners, the ACH/EDI system incorporated Corporate-to-Corporate payments. Because of the importance of moving information quickly, the NRC can now accept electronic payment through our Corporate-to-Corporate payment program.

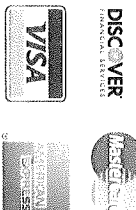
To pay by ACH/EDI, you may obtain a copy of NRC Form 628, FINANCIAL EDI AUTHORIZATION, by calling the Accounts Receivable Help Desk at (301) 415-7554. Completed forms should be returned to the NRC Office of the Chief Financial Officer at the contact information provided under FOR INFORMATION of this brochure.



The NRC is currently accepting credit cards for payment of annual fees, full cost licensing and inspection fees, new license fees, revisions to reciprocity applications, civil penalties, and other fees. We accept Visa, MasterCard, American Express, and Discover. If you wish to pay by credit card, complete the authorization form included with your invoice or civil penalty. You may also print a copy of the form from the NRC Web site. The URL is <http://www.nrc.gov>. Select NRC Library > Document Collections > Forms > Forms (NRC). The authorization form is NRC Form 629, Authorization for Payment by Credit Card.

Mail the completed credit card authorization to:

U.S. Nuclear Regulatory Commission
U.S. Bank
P.O. Box 979051
St. Louis, MO 63197-9000

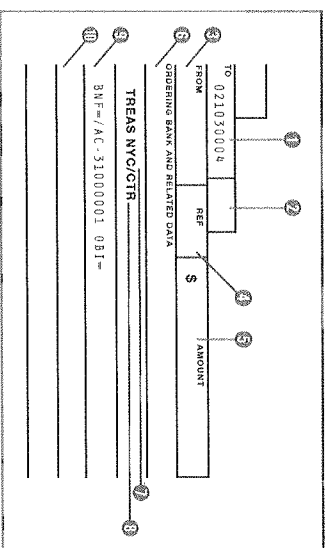


Be sure to reference your invoice number if you are paying a bill. If you are submitting an application fee for a new license or a revision to a reciprocity application, just state this in the invoice field. Credit card payments are only accepted for invoices under \$24,999.99.

If you are paying a civil penalty, reference the Enforcement Action (EA) number in the invoice field.



The NRC can receive funds through the U.S. Department of the Treasury (Treasury) Fedwire Deposit System. The basic wire message format below complies with the Federal Reserve Board's standard structured third-party format for all electronic funds transfer (EFT) messages.



See sample EFT message to Treasury above. Each numbered field is described below:

- 1 RECEIVER-DFI# - Treasury's ABA number for deposit messages is 021030004.
- 2 TYPE-SUBTYPE-CD - The sending bank will provide the type and subtype code.
- 3 SENDER-DFI# - The sending bank will provide this number.
- 4 SENDER-REF# - The sending bank will insert this 16-character reference number at its discretion.

5 AMOUNT - The transfer amount must be punctuated with commas and decimal point; use of the "\$" is optional. The depositor will provide this item.

6 SENDER-DFI-NAME - The Federal Reserve Bank will automatically insert this information.

7 RECEIVER-DFI-NAME - Treasury's name for deposit messages is "TREAS NYC". The sending bank will enter this name.

8 PRODUCT CODE - A product code of "CTR" for customer transfer should be the first data in the RECEIVER-TEXT field. Other values may be entered, if appropriate, using the ABA's options. A slash must be entered after the product code.

9 AGENCY LOCATION CODE (ALC) - THIS ITEM IS OF CRITICAL IMPORTANCE. IT MUST APPEAR ON THE FUNDS TRANSFER DEPOSIT MESSAGE IN THE PRECISE MANNER AS STATED TO ALLOW FOR THE AUTOMATED PROCESSING AND CLASSIFICATION OF THE FUNDS TRANSFER MESSAGE TO THE AGENCY LOCATION CODE OF THE APPROPRIATE AGENCY. The ALC identification sequence can, if necessary, begin on one line and end on the next line, however, the field tag "BNF=" must be on one line and cannot contain any spaces. The NRC's 8-digit ALC is: BNF=/AC-31000001

10 THIRD-PARTY INFORMATION - The Originator to Beneficiary Information (OBI) field tag "OBI=" signifies the beginning of the free-form third-party text. All other identifying information intended to enable the NRC to identify the deposit—for example, NRC annual fee invoice number, description of fee, 10 CFR 171 annual fee, and licensee name—should be placed in this field.

The optimum format for fields 7, 8, 9, and 10 using an 8-digit ALC is as follows:

TREAS NYC/CTR/BNF=/AC-31000001 OBI=

The optimum format, shown above, will allow 219 character positions of information following the "OBI=" indicator.

If the licensee's bank is not a member of the Federal Reserve System, the non-member bank must transfer the necessary information and funds to a member bank, which then must transfer the information and funds to the local Federal Reserve Bank.

For transfer of funds from local Federal Reserve Banks to be recorded on the same day, the transfer must be received at the New York Federal Reserve Bank by 4 p.m., EST. Otherwise, the deposit will be recorded on the next workday.



Checks should be made payable to the U.S. Nuclear Regulatory Commission with the invoice number. Enforcement Action (EA) number, or other information which identifies the payment, written on the check. Mail the check to:

U.S. Nuclear Regulatory Commission
U.S. Bank
P.O. Box 979051
St. Louis, MO 63197-9000

CERTIFICATE OF DISPOSITION OF MATERIALS

PLEASE READ THESE INSTRUCTIONS BEFORE COMPLETING NRC FORM 314.

Subpart E of 10 CFR Part 20 establishes the radiological criteria for license terminations/decommissioning of facilities licensed under 10 CFR Parts 30, 40, 50, 60, 61, 70, and 72, as well as other facilities subject to the Commission's jurisdiction under the Atomic Energy Act of 1954, as amended, and the Energy Reorganization Act of 1974, as amended.

INSTRUCTIONS

Section B, Item 2.

Licensees should describe the specific radioactive material transfer actions. If radioactive wastes were generated in terminating this license, the licensee should describe the disposal actions taken, including the disposition of low-level radioactive waste, mixed waste, greater-than-Class-C waste, and sealed sources.

Section B, Item 2.a.

The information provided concerning the transfer of radioactive material to another licensee should specify the date of the transfer, the name of the licensee recipient, an individual contact name and telephone number for the licensee recipient, and the recipient's NRC or Agreement State license number.

Section B, Item 2.b.

For disposal of radioactive materials, licensees should describe the specific disposal method or procedure (e.g., decay-in-storage). For those cases when radioactive materials are disposed of by a licensed disposal site or by a waste contractor, the licensee should specify the name, address, and telephone number of the licensed disposal site operator or waste contractor.

Section B, Item 2.c.

"Residual radioactivity," as defined in 10 CFR 20.1003, means radioactivity in 'areas' (structures, materials, soils, etc.) remaining as a result of activities (licensed and unlicensed) under the licensee's control from sources used by the licensee, excluding background radiation. ALARA is defined in 10 CFR 20.1003.

FILE CERTIFICATES AS FOLLOWS:

IF YOU ARE LOCATED IN:

ALABAMA, CONNECTICUT, DELAWARE, DISTRICT OF COLUMBIA, FLORIDA, GEORGIA, KENTUCKY, MAINE, MARYLAND, MASSACHUSETTS, NEW HAMPSHIRE, NEW JERSEY, NEW YORK, NORTH CAROLINA, PENNSYLVANIA, PUERTO RICO, RHODE ISLAND, SOUTH CAROLINA, TENNESSEE, VERMONT, VIRGINIA, VIRGIN ISLANDS, OR WEST VIRGINIA, SEND CERTIFICATES TO:

LICENSING ASSISTANT SECTION
NUCLEAR MATERIALS SAFETY BRANCH
U.S. NUCLEAR REGULATORY COMMISSION, REGION I
2100 RENAISSANCE BOULEVARD, SUITE 100
KING OF PRUSSIA, PA 19406-2713

IF YOU ARE LOCATED IN:

ALASKA, ARIZONA, ARKANSAS, CALIFORNIA, COLORADO, HAWAII, IDAHO, KANSAS, LOUISIANA, MISSISSIPPI, MONTANA, NEBRASKA, NEVADA, NEW MEXICO, NORTH DAKOTA, OKLAHOMA, OREGON, PACIFIC TRUST TERRITORIES, SOUTH DAKOTA, TEXAS, UTAH, WASHINGTON, OR WYOMING, SEND CERTIFICATES TO:

MATERIAL RADIATION PROTECTION SECTION
U. S. NUCLEAR REGULATORY COMMISSION, REGION IV
1600 E. LAMAR BOULEVARD
ARLINGTON, TX 76011-4511

ILLINOIS, INDIANA, IOWA, MICHIGAN, MINNESOTA, MISSOURI, OHIO, OR WISCONSIN, SEND CERTIFICATES TO:

MATERIALS LICENSING SECTION
U.S. NUCLEAR REGULATORY COMMISSION, REGION III
2443 WARRENVILLE ROAD, SUITE 210
LISLE, IL 60532-4352



CERTIFICATE OF DISPOSITION OF MATERIALS

Estimated burden per response to comply with this mandatory collection request: 30 minutes. This submittal is used by NRC as part of the basis for its determination that the facility is released for unrestricted use. Send comments regarding burden estimate to the FOIA, Privacy, and Information Collections Branch (T-5 F53), U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001, or by e-mail to Infocollections.Resource@nrc.gov, and to the Desk Officer, Office of Information and Regulatory Affairs, NE08-10202, (3150-0028), Office of Management and Budget, Washington, DC 20503. If a means used to impose an information collection does not display a currently valid OMB control number, the NRC may not conduct or sponsor, and a person is not required to respond to, the information collection.

LICENSEE NAME AND ADDRESS

LICENSE NUMBER

DOCKET NUMBER

LICENSE EXPIRATION DATE

A. LICENSE STATUS (Check the appropriate box)

- This license has expired. This license has not yet expired; please terminate it.

B. DISPOSAL OF RADIOACTIVE MATERIAL

(Check the appropriate boxes and complete as necessary. If additional space is needed, provide attachments)

The licensee, or any individual executing this certificate on behalf of the licensee, certifies that:

1. No radioactive materials have ever been procured or possessed by the licensee under this license.
2. All activities authorized by this license have ceased, and all radioactive materials procured and/or possessed by the licensee under this license number cited above have been disposed of in the following manner.
- a. Transfer of radioactive materials to the licensee listed below:
- b. Disposal of radioactive materials:
1. Directly by the licensee:
2. By licensed disposal site:
3. By waste contractor:
- c. All radioactive materials have been removed such that any remaining residual radioactivity is within the limits of 10 CFR Part 20, Subpart E, and is ALARA.

C. SURVEYS PERFORMED AND REPORTED

1. A radiation survey was conducted by the licensee. The survey confirms:
- a. the absence of licensed radioactive materials
- b. that any remaining residual radioactivity is within the limits of 10 CFR 20, Subpart E, and is ALARA.
2. A copy of the radiation survey results:
- a. is attached; or b. is not attached (Provide explanation); or c. was forwarded to NRC on: _____ Date
3. A radiation survey is not required as only sealed sources were ever possessed under this license, and
- a. The results of the latest leak test are attached; and/or b. No leaking sources have ever been identified.

The person to be contacted regarding the information provided on this form:

NAME	TITLE	TELEPHONE (Include Area Code)	E-MAIL ADDRESS

Mail all future correspondence regarding this license to:

C. CERTIFYING OFFICIAL

I CERTIFY UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT

PRINTED NAME AND TITLE	SIGNATURE	DATE

WARNING: FALSE STATEMENTS IN THIS CERTIFICATE MAY BE SUBJECT TO CIVIL AND/OR CRIMINAL PENALTIES. NRC REGULATIONS REQUIRE THAT SUBMISSIONS TO THE NRC BE COMPLETE AND ACCURATE IN ALL MATERIAL RESPECT. 18 U.S.C. SECTION 1001 MAKES IT A CRIMINAL OFFENSE TO MAKE A WILLFULLY FALSE STATEMENT OR REPRESENTATION TO ANY DEPARTMENT OR AGENCY OF THE UNITED STATES AS TO ANY MATTER WITHIN ITS JURISDICTION.