

---CHEMISTS - MICROBIOLOGISTS---

1820 DELMAR BLVD.
ST. LOUIS, MO 63103-1798 U.S.A
TELEPHONE 314-241-8772
FAX 314-241-8775
rossl@missourianalytical.com

September 22, 2017

United States Nuclear Regulatory Commission Region III Attn: Materials Licensing Branch Chief 2443 Warrenville Rd., Suite 210 Lisle, IL 60532-4352

RE: NRC Material License No. 24-12366-01

Dear Sir/Madam,

Missouri Analytical Laboratories, Inc. currently has NRC Material License No. 24-12366-01 (Amendment No. 19) and has decided to cease licensed activities permanently at the entire site. Thus we request that our license be terminated and that our entire site be released for unrestricted use.

Attached is NRC Form 314, our "Protocol for the Disposition of Radioactive Material and the Decommissioning of the Site", dated July 18, 2017, and our report of the execution of this protocol.

Submitted by <u>~</u>

Ross Larson

Radiation Safety Officer

Submitted by

Richard Gilbert

Vice President

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NRC FORM 314 U.S. NUCLEAR REGULATORY COMMISSION APPROVED BY OMB: NO. 3150-0028 FYPIRES: 02/20/2020 (02-2017) 10 CFR 30.36(j)(1); Estimated burden per response to comply with this mendatory collection request: 30 minutes. This submitted 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 FOUL Phivacy, and information Collections Branch (T-G FS3), U.S. Nuclear Regulatory Commission, Washington, C. 20555-0001, or by e-mail to Introductions Resource@fine.gov, and to the Dest Office, Office of Information and Regulatory Atlain, NEO8-10202, (3150-0026), Office of Management and Budget, Westington, DC 20503. If a 40.42(j)(1); 70.38(j)(1); and 72.54(k)(5)(1)(1) CERTIFICATE OF DISPOSITION OF MATERIALS LICENSEE NAME AND ADDRESS Missouri Analytical Laboratories, Inc. 1820 Delmar Blvd. 24-12366-01 1030-05138 St. Louis, mo 63/03 December 31,2024 A. LICENSE STATUS (Check the appropriate box) This license has not yet expired; please terminate it. This license has expired. 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: 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 nave been dispersed.

a. Transfer of radioactive materials to the licensee listed below:

R.M. Wester and Associates, Inc., NRC licensee 24-20091-01,

on September 15, 2017 transfer of sealed sources. Refer to attachments 1. Directly by the licensee: . Directly by the licensee: Decay -in - Stonge. Reten to attachment. 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: 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: RossLAMIDSOUI Anal Ross Larson R5'0 C. CERTIFYING OFFICIAL I CERTIFY UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT Ross Larson

WARNING: FALSE STATEMENTS IN THIS CERTIFICATE MAY BE SUBJECT TO CIVIL AND/OR CRIMINAL PENALTIES. NRC REGULATIONS REQUIRE THAT

WILLFULLY FALSE STATEMENT OR REPRESENTATION TO ANY DEPARTMENT OR AGENCY OF THE UNITED STATES AS TO ANY MATTER WITHIN ITS JURISDICTION

SUBMISSIONS TO THE NRC BE COMPLETE AND ACCURATE IN ALL MATERIAL RESPECT. 18 U.S.C. SECTION 1001 MAKES IT A CR



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<u>Protocol for the Disposition of Radioactive Material</u> and the Decommissioning of the Site

Page 1 of 2

I. Introduction

Missouri Analytical Labs, Inc. currently has NRC Material License No. 24-12366-01 (Amendment No. 19) and has decided to cease licensed activities permanently at the entire site. Per our license, we are authorized to hold radioactive material with a half-life of less than or equal to 120 days for decay-in-storage. The byproduct material handled is P-32 with a half-life of 14.3 days. The last shipment of irradiated teeth was received on November 10, 2016 and the last generation of radioactive slurry was on January 4, 2017. Thus the most recent teeth and slurry have been held for decay-in-storage beyond 10 half-lives. No principal activity has been conducted since January 4, 2017. A report will be prepared by the RSO following the execution of this protocol and NRC Form 314 will be completed.

II. <u>Disposition of Radioactive Material</u>

Per our license, survey the radioactive material waste container surface with a calibrated survey meter set on its most sensitive scale and with no interposed shielding. The meter to be used is Victoreen Model 493, serial number 765, set at the lowest setting (1), and last calibrated on June 13, 2017 by R. M. Wester & Associates, 215 Indacom Dr., St. Peters, MO 63376. A record of the disposal will be made which includes the date of disposal, the date on which byproduct material was placed in storage, the radionuclide disposed, the survey meter used, the background dose rate, the dose rate measured at the surface of each waste container, the name of the individual performing the disposal, and the name of a witness to the disposal. In order to be eligible for disposal, all radioactive materials must be indistinguishable from background. Before disposal as ordinary trash, all radiation labels will be removed.

The following license-exempt sealed sources will be transferred to the licensee R. M. Wester & Associates:

- 1) ²¹⁰Bi, 0.0187 μCi, 4/22/74, NEN
- 2) ²¹⁰Bi, 0.0213 μCi, 11/12/87, NEN
- 3) ¹⁴C, 0.148 μCi, 7/29/83, NEN
- 4) ⁶⁰Co, 0.040 μCi, 11/18/82, NEN
- 5) ⁶⁰Co, 0.042 μCi, 7/14/87, NEN
- 6) ¹³⁷Cs, 1.04 μCi, 1/12/84, NEN
- 7) ⁹⁰ Sr, 0.022 μCi, 4/11/83, NEN

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<u>Protocol for the Disposition of Radioactive Material</u> and the Decommissioning of the Site

Page 2 of 2

Protocol (continued)

III. Radiation Survey

After all P-32 material has been properly disposed of, a radiation survey will be conducted of the Second Floor Lab Area and Lower Level Radioactive Decay-in-Storage Area where NRC licensed material has been used and stored. The areas surveyed are those depicted in Diagram 99.A.0 which is part of Missouri Analytical SOP Number 99.0 entitled "Radiation Safety Program". The new laboratory bench which was authorized for use of licensed materials in Amendment No. 17 was never put into service and thus will not be surveyed. Diagram 99.A.0 depicts the only areas in which licensed materials have been used or stored. The purpose of this radiation survey is to determine whether or not licensed radioactive materials are absent (indistinguishable from background) or whether any remaining residual radioactivity is within the limits of 10 CFR 20, Subpart E, and is ALARA.

IV. Wipe Testing

After the survey referenced in Section III is completed, wipe testing will be performed per SOP No. 99.0 (Radiation Safety Program). The areas to be wipe tested are those depicted in Diagram 99.A.0 and will include any area which the survey found to have an activity of greater than 0.1 mR/hr. At each site, swab a 100 square cm area using a water-moistened cotton tip swab and an aluminum 100 square cm template. On the gas flow counter, count the calibrator, blank swabs, and test swabs 7 minutes. The gas flow counter used will be Tennelec APC-II, serial # 71629, calibrated with license-exempt sealed source 90 Sr, $0.022~\mu$ Ci, 4/11/83, NEN. The purpose of the wipe testing is to determine whether or not licensed radioactive materials are absent (indistinguishable from background) or whether any remaining residual radioactivity is within the limits of 10 CFR 20, Subpart E, and is ALARA.

Submitted by Comman 7/18/17

Ross Larson

Radiation Safety Officer

Approved by

Richard Gilbert

Vice President



--- CHEMISTS - MICROBIOLOGISTS---

1820 DELMAR BLVD. ST. LOUIS, MO 63103-1798 U.S.A TELEPHONE 314-241-8772 FAX 314-241-8775 rossl@missourianalytical.com

Results of the Execution of "Protocol for the Disposition of Radioactive Material and the Decommissioning of the Site"

Page 1 of 3

I. Introduction

Missouri Analytical Laboratories, Inc. currently has NRC Material License No. 24-12366-01 (Amendment No. 19) and has decided to cease licensed activities permanently at the entire site. Thus the document "Protocol for the Disposition of Radioactive Material and the Decommissioning of the Site", dated July 18, 2017, was written by the Radiation Safety Officer and approved by executive management. This report provides the results of the execution of this protocol.

II. Disposition of Radioactive Material

Per our license, we are authorized to hold radioactive material with a half-life of less than or equal to 120 days for decay-in-storage. The byproduct material handled is P-32 with a half-life of 14.3 days. The last shipment of irradiated teeth was received on November 10, 2016, the last generation of radioactive slurry was on January 4, 2017, and the last generation of planchets containing dried radioactive slurry was on January 5, 2017. Thus the most recent irradiated teeth, radioactive slurry, and radioactive planchets have been held for decay-in-storage beyond 10 half-lives. At the disposal date of June 16, 2017, for the most recent teeth, slurry, and planchets, the age was 218, 163, and 162 days, respectively. Per our license, before disposal as ordinary trash, byproduct material will be surveyed at the container surface with an appropriate survey meter set on its most sensitive scale and with no interposed shielding to determine whether its radioactivity cannot be distinguished from background.

The survey was conducted on June 15 and June 16, 2017 on all byproduct material by Ross Larson (RSO) and Nicole Engler (both authorized users per license). The survey meter used was Victoreen Model 493, serial number 765, set at the lowest setting (1), and last calibrated on June 13, 2017 by R. M. Wester Associates, 215 Indacom Dr., St. Peters, MO 63376 (NRC License 24-20091-01). The disposal record is attached and shows entries for date of disposal, date of storage, radio-nucleotides disposed and type of waste, survey instrument, background dose rate range in mR/hr, waste dose rate at surface in mR/hr, disposal signature, and witness signature.

The background dose rate was 0.00-0.06 mR/hr on June 15, 2017 and 0.00 to 0.05 mR/hr on June 16, 2017. The measured dose rate for all byproduct material was within these ranges. All byproduct material was indistinguishable from background, all radiation labels were removed, and all byproduct material was disposed of as ordinary trash. No byproduct material is present on our site.

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Results of the Execution of "Protocol for the Disposition of Radioactive Material and the Decommissioning of the Site"

Page 2 of 3

Disposition of Radioactive Material (continued)

The following license-exempt sealed sources were transferred on September 15, 2017 to R. M. Wester & Associates, Inc., NRC license 24-20091-01, individual contact and phone number: Joseph D. Koch, 636-928-9628.

- 1) ²¹⁰Bi, 0.0187 μCi, 4/22/74, NEN
- 2) ²¹⁰Bi, 0.0213 μCi, 11/12/87, NEN
- 3) ¹⁴C, 0.148 μCi, 7/29/83, NEN
- 4) ⁶⁰Co, 0.040 μCi, 11/18/82, NEN
- 5) ⁶⁰Co, 0.042 μCi, 7/14/87, NEN
- 6) ¹³⁷Cs, 1.04 μCi, 1/12/84, NEN
- 7) ⁹⁰ Sr, 0.022 μCi, 4/11/83, NEN

No license-exempt sealed sources are present on our site.

III. Radiation Survey

On September 12, 2017, a radiation survey was conducted by Ross Larson and witnessed by Nicole Engler. The survey meter used was Victoreen Model 493, serial number 765, set at the lowest setting (1), and last calibrated on June 13, 2017 by R. M. Wester & Associates. The radiation survey covered the Second Floor Lab Area and Lower Level Radioactive Decay-in-Storage Area where NRC licensed material had been used and stored. All P-32 material had been properly disposed of prior to this survey. The background radiation was determined about 50 feet away from the licensed area and had the following readings:

Second Floor Lab Area: 0.00-0.06 mR/hr

Lower Level Radioactive Decay-in-Storage Area: 0.00-0.06 mR/hr

The result of the radiation survey was that no readings were outside of the background readings for the areas where NRC licensed material had been used and stored.

IV. Wipe Testing

After the survey referenced in Section III, wipe testing was performed per SOP No. 99.0, entitled "Radiation Safety Program". Diagram 99.A.0 (attached) depicts the areas where licensed materials were used or stored and the sites that were wipe tested. At each site, a 100 square cm area was swabbed using a water-moistened cotton tip swab and an aluminum 100 square cm template. Using a gas flow counter, the calibrator, blank swab, and each site test swab were analyzed 7 minutes for beta counts. The gas flow counter used was Tennelec APC-II, serial #71629,

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Results of the Execution of "Protocol for the Disposition of Radioactive Material and the Decommissioning of the Site"

Page 3 of 3

Wipe Testing (continued)

calibrated with license-exempt sealed source 90 Sr, 0.022 μ Ci, 4/11/83, NEN on the day of the wipe testing (September 12, 2017). The swabbing was performed by Ross Larson and witnessed by Nicole Engler. The gas flow counter was operated by Nicole Engler and witnessed by Ross Larson. The dpm/100cm² for the test site swabs was calculated by Ross Larson and the calculations were checked by Nicole Engler.

The wipe test report is attached. The dpm/100cm² ranged from 0.73 to 8.93 for the test site swabs. The limit is 200 dpm/100cm².

V. Conclusion

All radioactive material has been removed from our site. The radiation survey and wipe testing have demonstrated that any remaining residual radioactivity is within the limits of 10 CFR 20, Subpart E, and is ALARA. Thus we request that our license be terminated and that our entire site be released for unrestricted use.

Submitted by

Ross Larson

Radiation Safety Officer

Submitted by

Nicole Engler

Licensed User

Reviewed by

Richard Gilbert

Vice President

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"Specializing In Your Radiation Safety Needs"

R. M. WESTER and ASSOCIATES, INC.

215 Indacom Drive St. Peters, MO 63376 (636) 928-9628 www.rmwester.com

September 15, 2017

Ross Larson Missouri Analytical Laboratories, Inc. 1820 Delmar Blvd. St. Louis, MO 63103 USA

Dear Mr. Larson,

This letter is to confirm receipt of the following sources at R. M. Wester and Associates, Inc., NRC license 24-20091-01 on September 15, 2017:

- 1) ²¹⁰Bi, 0.0187 µCi, 4/22/74, NEN
- 2) ²¹⁰Bi, 0.0213 μCi, 11/12/87, NEN
- 3) ¹⁴C, 0.148 μCi, 7/29/83, NEN
- 4) 60Co, 0.040 μCi, 11/18/82, NEN
- 5) ⁶⁰Co, 0.042 μCi, 7/14/87, NEN
- 6) ¹³⁷Cs, 1.04 μCi, 1/12/84, NEN
- 7) 90Sr, 0.022 μCi, 4/11/83, NEN

Please feel free to contact me if you need additional information.

Sincerely,

Joseph D. Koch, PhD, RPIH

Director of Operations

R. M. Wester and Associates, Inc.

Shipper's No.

Date: September 15, 2017

Carrier: R. M. Wester and Associates, Inc.

at 1820 Delmar Blvd., St. Louis, MO

from Missouri Analytical Laboratories, Inc.

To:

Consignee:

R. M. Wester and Associates, Inc.

Zip

63376

Shipper:

Missouri Analytical Laboratories, Inc.

Street:

Route:

215 Indacom Dr.

St. Peters, MO

Street:

Origin:

1820 Delmar Blvd.

St. Louis, MO

Zip

63103

Destination:

major roads and highways

No Ser and Triby of the other	НМ	1 D Superior	Descriation of Anno	Chy	diff), Fings	Technique my areas vidence on activities	Monda vintpodes annu timb	Clayer Tage
1 box	Х	UN2910	Radioacitve Material, Excepted Package,	7		1.332 uCi	5 lb	
			limited quantity of material					
				+	-			

Shipper:

Missouri Analytical Laboratories, Inc.

Carrier:

R. M. Wester and Associates, Inc.

Per:

Ross Larson

Date:

9/15/17 Per:

Joseph Koch

)ate: 9/15/17

Signature

am lana

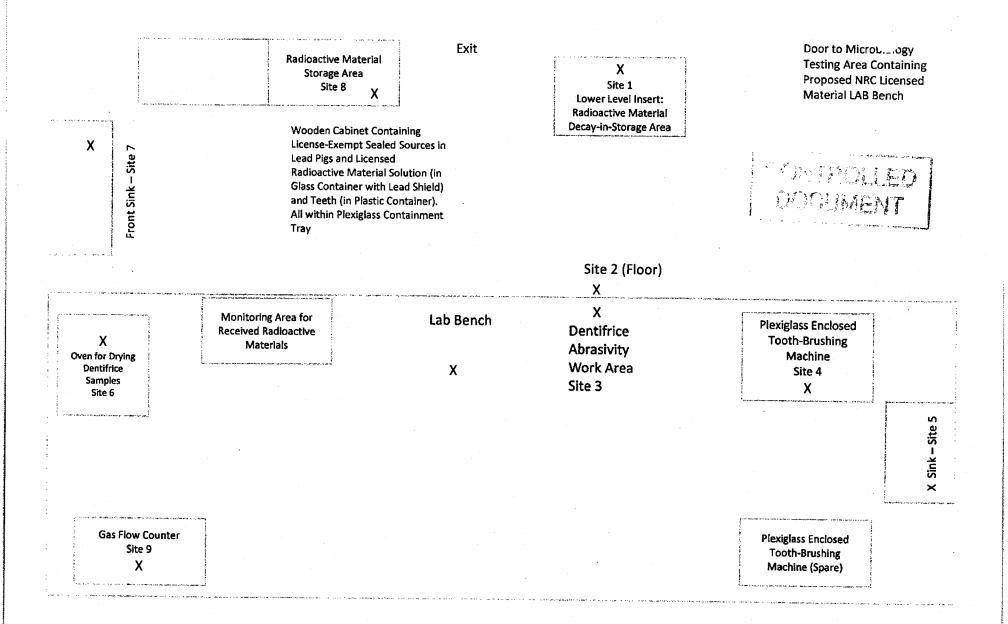
Dute.

-

Signature:

EMERGENCY RESPONSE TELEPHONE NUMBER: 636-928-9628

This is to certify that the above hamed indicentals are properly of another perference of souther intrical and labeled and late in properse difficient for framepor properties acceptable department of the growing tion. For above a graphic



Enlarged Diagram of Second Floor Lab Area and Insert of Lower Level Radioactive Material Decay-in-Storage Area Where Current NRC Licensed Material Are Used and Stored. X = Areas That Are Wipe-Tested On a Monthly Basis. Area Dimensions: 26 Feet Long By 17 Feet Wide. Diagram Date: June 26, 2014

BATTERY	DEAD	TUE	SEP	12.	2017
GROUP C					

DVOOL P							
SAMPL	E TIME	alpha	BETA	ALPHA	BETA	TOD CLOCK	
SN CC	DE (MIN.)	COUNTS	COUNTS	CPM	CPM	HR: MN: SEC	
i	7.00	2	91417	0.28	13059.57	18:84:01 Calibrator	
2	7.00	1	58	0.14	8.28	10:10:40 Blank (Background) Swal)
3	7.00	5	83	0.71	11.85	10:17:19 Site / Swab	
3	7.00	. 4	66	0.57	9,42	18:23:58 SHL & SWOA	
3	7.00	1	75	0.14	10.71	10:30:38 Site 3 Swab	
Ĝ	7.00	2	62	0.28	8, 85	10:37:17 Strc 4 Sweb	
7	7.00	1	60	0.14	8.57	10:43:56 SHL 5 SWAD	
7	7.00	1	65	0.14	9.28	10:50:35 Site & Swab	
9	7.00	0	74	9	10.57	10:57:15 Site 7 Swab	
10	7.00	Ø	76	Ø	10.85	11:03:55 Site & Saub	
11	7.00	Ø	64	0	9.14	11:10:35 Site 95wab	

Other test swabs per survey result: No Jun 9/12/17
Survey by: Amount 9/12/17 witnessed by: Myst fup 9/10/17
Swabbed by: Dur 2m 9/12/17 witnessed by Mush fupl 9/12/17
Analysis (counting by! Mush full 9/10/11 Witnessed by Park 9/14/17



- MICROBIOLOGISTS---

1820 DELMAR BLVD. ST. LOUIS, MO 63103-1798 U.S.A **TELEPHONE 314-241-8772** FAX 314-241-8775 rossl@missourianalytical.com

Wipe Test Report

Date of Swabbing: September 12, 2017

Swabbed by: Ross Larson Witnessed by: Nicole Engler

Instrument: Tennelec APC-II, serial #71629

Instrument Efficiency: 40% Area Swabbed: 100 cm²

Monitoring For: Phosphorus-32 beta counts

Counting Time: 7 minutes

Calibrator: 90Sr, 0.022 µCi, 4/11/83, NEN

Article Counted	cp7m	срт	cpm-blank	dpm/100 cm²
Calibrator	91,417	13059.57	-	
Blank Swab	58	8.28	-	-
Site 1 Swab	83	11.85	3.57	8.93
Site 2 Swab	66	9.42	1.14	2.85
Site 3 Swab	75	10.71	2.43	6.08
Site 4 Swab	62	8.85	0.57	1.43
Site 5 Swab	60	8.57	0.29	0.73
Site 6 Swab	65	9.28	1.00	2.50
Site 7 Swab	74	10.57	2.29	5.73
Site 8 Swab	76	10.85	2.57	6.43
Site 9 Swab	64	9.14	0.86	2.15
Other Swab	None			_

where dpm= cpm - blank (background)

Limit: 200 dpm/100 cm²

0.40

Submitted by 4

Ross Larson

RSO

Submitted by

Nicole Engler

Licensed User

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DEA LICENSED

GMP COMPLIANT