3. POSSESSION LIMITS

3.1 TOTAL LICENSE LIMIT

| 6. Material | | 7. Form | | 8. Limit (grams) |
|-------------|--------------------------------|---------|--|---------------------|
| A . | Pu (enriched to 98% Pu-239) | А. | Sealed sources | 1 |
| B. | Pu (enriched to 80% Pu-238) | В. | PuBe neutron Sources | 1 |
| c. | Pu (enriched to 75% Pu-239) | C. | Mixed oxide fuel rods as sealed sources | 365 |
| D, | U-235 (enriched to $< 10\%$) | D. | Mixed oxide fuel rods as sealed sources | 277 |
| E. | U-235 (enriched to > 20%) | E. | Sealed sources | 32 |

The total quantity of SNM does not exceed the amount specified in 10 CRF 73.2 (y), "Special Nuclear Material of Low Strategic Significance."

9a. Authorized Use

9010290449 901024 PDR ADOCK 07001359 PDC ADOCK 07001359

All items are to be used for storage, for preparation for transfer to another licensed entity, and for disposal as waste.

9b. Authorized Place of Use

Items A, C, D, and E will be stored only at the manufacturing Facility located at 8221 Arjons Road, Suite F, San Diego, California 92126. Item B may also be stored at our laboratory and facilities at 3030 Callan Road, San Diego, California.

3.2 FORM OF LICENSED MATERIAL

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All SNM specified in the possession limits is in the form of sealed sources.

3.3 EXEMPTION FROM REQUIREMENTS SET FORTH IN 10 CFR 70.24

The mass limitation given in Section 3.1 for ²³⁵U when coupled to the maximum weighted mass of Pu (weighting factor of 2.5) is below critical mass for homogenized systems of various enrichments with optimum moderation and full reflection as given in Figure 13 of TID-7028.

The materials are not in a form to be homogenized and there are no massive moderators or reflectors of beryllium, heavy water or graphite present in the storage areas.

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