

U. S. NUCLEAR REGULATORY COMMISSION

REGION III

Report No. 30-05619/82-01(DETP)

Docket No. 03005619

License No. 34-00486-04

Category E

Priority IV

Licensee: Victoreen, inc.
10101 Woodland Avenue
Cleveland, OH 44104

Inspection At: 10101 Woodland Avenue
Cleveland, OH

Inspection Conducted: November 9, 1982

S. R. Lasuk

Inspector: S. R. Lasuk

1-6-83

Approved By: *D. J. Srenjowski*
D. J. Srenjowski, Chief
Materials Radiation Protection
Section 2

1-6-83

Inspection Summary

Inspection on November 9, 1982 (Report No. 30-05619/82-01(DETP))

Areas Inspected: Special, announced, safety inspection of the licensee's organization, materials and equipment, and activities associated with the shipment at the licensee's and customer's facilities to determine the circumstances surrounding a reported sealed source shipping violation.

Results: One apparent item of noncompliance - failed to provide required information on shipping papers and required labels for a package containing licensed radioactive material as specified in DOT regulations as required by 10 CFR 71.5(a) - Section 7.

DETAILS

1. Persons Contacted

John Ashe, Ph.D. - President
Stanley J. Kawecki - Radiation Safety Officer
David Smotzer - Manager, Systems Manufacturing

2. Receipt of Information

Region I contacted Region III on October 19, 1982 to report that a Victoreen, Incorporated Model 848-8 calibrator containing 112 millicuries of cesium-137 was shipped without proper warning labels or shipping papers by the licensee to Indian Point No. 3 Nuclear Power Station in New York on September 17, 1982. A radiation survey of the shipping container at Indian Point, about a week later, showed 12 mR/hr on contact and 0.5 mR/hr at three feet.

This special announced inspection by Region III was conducted at the licensee's facility on November 9, 1982 to determine the circumstances surrounding this apparent violation of shipping requirements. During the inspection, it was determined that the cesium-137 source activity and the shipping date, as shown above, were inaccurate.

3. Licensed Program

NRC Materials License No. 34-00486-04 was amended in its entirety on May 9, 1979; the latest amendment (No. 37) was issued on August 30, 1982. The material authorized under this license includes a variety of isotopes in various forms and quantities, including 410 curies of cesium-137 as sealed sources. The authorized use is for possession and use in the development, testing, manufacturing, and demonstration of radiation detection instruments, radiation detection systems, and electron tubes; packaging for shipment; and for distribution to persons authorized to receive the licensed material pursuant to terms and conditions of specific licenses issued by the NRC or an Agreement State.

4. Inspection History

The most recent routine inspection of activities conducted under this license was on September 22, 1981, at which time one item of non-compliance (failure to have the license amended to show they have a new Radiation Protection Officer) was identified. No items of non-compliance were identified during the three previous inspections on September 19, 1978, February 12, 1975, and May 9, 1973. This license was initially issued in January 1959.

5. Organization

John B. Ashe, Ph.D. - President
Kenneth E. Stafford, Jr. - Manager, Quality Reliability

Stanley J. Kawecki - RSO (reports to Mr. Stafford)
David Smotzer - Manager, Systems Manufacturing
David Bucholz - Supervisor, Production and Inventory Control

No violations were identified.

6. Materials and Equipment

The licensee's Field Calibrator, Model 848-8, is a portable unit containing a sealed radiation source for on-site calibration of Victoreen Area Monitors. The calibrator involved in this inspection contained a 114 millicurie cesium-137 source encapsulated in welded stainless steel, and secured inside a rotating section of the source shield. The source (Model No. 848-8-35, Serial No. 1972 GR) was manufactured by Amersham-Searle and was leak tested by the licensee on September 20, 1982.

A radiation level measurement at contact with the metal shell of this type of calibrator is normally in the range of 30 to 35 mR/hr, according to the RSO.

A sketch of the calibrator is attached to this report as Exhibit A.

No violations were identified.

7. Activities Associated With the Shipment at the Licensee's and Customer's Facilities

Preparation of the shipment for the Indian Point Station during the evening of September 23, 1982 was under the supervision of Messrs. Smotzer and Bucholz who were assisted by two electronic assembly technicians; these four individuals are not normally involved in this type of activity.

The shipment, a radiation monitoring system, included four skids of electronic equipment, piping, shielding, etc., radioactive check sources which are exempt from Department of Transportation packaging and labeling requirements and a 114 millicurie cesium-137 sealed source contained in a calibrator. The shipment was scheduled to leave the Victoreen plant at 10:00 p.m. on September 23, 1982. Prior to 7:00 p.m. that evening, the RSO issued the calibrator, containing the cesium-137 source, and nine check sources (exempt quantities) to Messrs. Smotzer and Bucholz who were to use these items to check out the equipment before it was shipped. Upon completion of their check out procedure, the calibrator and check sources were to be stored overnight in their locked Systems Test Area office. The RSO was to retrieve the calibrator and check sources when he reported for work during the morning of September 24, 1982 and then prepare the required shipping papers and have labels affixed to the crate in which the calibrator was to be shipped.

Delays were encountered during the evening of September 23, 1982 and the shipment did not leave the Victoreen plant until about 2:30 a.m. on September 24, 1982, via North American Van Lines.

At approximately 8:30 a.m. on September 24, 1982, the RSO learned that the calibrator had been included in the Indian Point shipment. He announced this shipping error to Dr. Ashe plus Messrs. Stafford, Smotzer, Bucholz, and others who were in attendance at a project meeting that morning. The RSO thought that another individual would notify the customer (Indian Point Station) of this matter; however, no notification was made. As a result, neither the customer nor the carrier knew that the shipment contained licensed material.

The shipment arrived at Indian Point at approximately 2:00 p.m. on September 24, 1982. Since there were no radiation warning labels on any of the packages and the shipping papers made no reference to licensed radioactive material, the shipment remained in the receiving area over the weekend. A radiation survey of the packaged calibrator was eventually made by Indian Point personnel and showed readings of 12 mR/hr at the surface and 0.5 mR/hr at three feet. This is an item of noncompliance with 10 CFR 71.5(a) since the shipment did not comply with the requirements in the Department of Transportation regulations in 49 CFR Parts 170-189. That is, 49 CFR 172.203(d) requires that shipping papers for a shipment of radioactive material must include the following entries, as appropriate: The name of each radionuclide in the radioactive material; the activity contained in each package of the shipment; the category of label applied to each package; and the transport index assigned to each package.

49 CFR 172.403(c) requires that each package of radioactive material must be labeled with a RADIOACTIVE YELLOW-II label if the package measures more than 0.5 but not more than 50 millirem per hour at each point, and not exceeding 1.0 millirem per hour at three feet from each point on the external surface of the package.

However, the shipping papers for the package containing 114 millicuries of cesium-137 that was shipped by the licensee on September 24, 1982 did not include the name of the radionuclide; the activity contained in the package; the category of label applied to the package; and the transport index assigned to the package. This package measured 12 millirem per hour on the external surface and 0.5 millirem per hour at three feet from the external surface and was not labeled with a RADIOACTIVE YELLOW-II label.

The shipment was moved from the receiving area to a work area during the morning of September 27, 1982. The unopened shipment remained in the work area until October 1, 1982 when Rich Long (Victoreen field service representative) opened the shipment in order to set up the equipment. It was at this time that both Mr. Long and the customer learned that the calibrator was included in the shipment. The NRC's Region I Resident Inspector was also informed of this matter. The packaged calibrator was surveyed by a member of the Health Physics Group at Indian Point and then placed in a holding room.

Shipping papers that were sent with the shipment on September 24, 1982 are attached to this report as Exhibit B. Decay curves for the calibrator

source, which were sent with the calibrator, are attached as Exhibit C. Shipping papers and other information which were prepared after the shipment reached Indian Point, and which were hand-carried to Indian Point by Rich Long on October 6, 1982, are shown as Exhibit D.

One apparent violation was identified.

8. Exit Interview

The inspector met with Dr. Ashe and Mr. Kawecki during the afternoon of November 9, 1982 to summarize the findings noted in the body of this report. The one violation was discussed and the inspector stated that it may result in a civil penalty. Dr. Ashe was also informed of the inspector's concern regarding the fact that Victoreen failed to notify the people at Indian Point, and their own field representative, that the calibrator containing licensed material was included in the September 24, 1982 shipment.

9. Enforcement Conference

An enforcement conference was conducted via telephone on November 18, 1982. The participants in this conference included Dr. Ashe and members of his organization plus A. B. Davis, D. J. Sreniawski, and S. R. Lasuk of the Region III office. The NRC's enforcement policy, the shipping violation, and our enforcement options were discussed at this time.

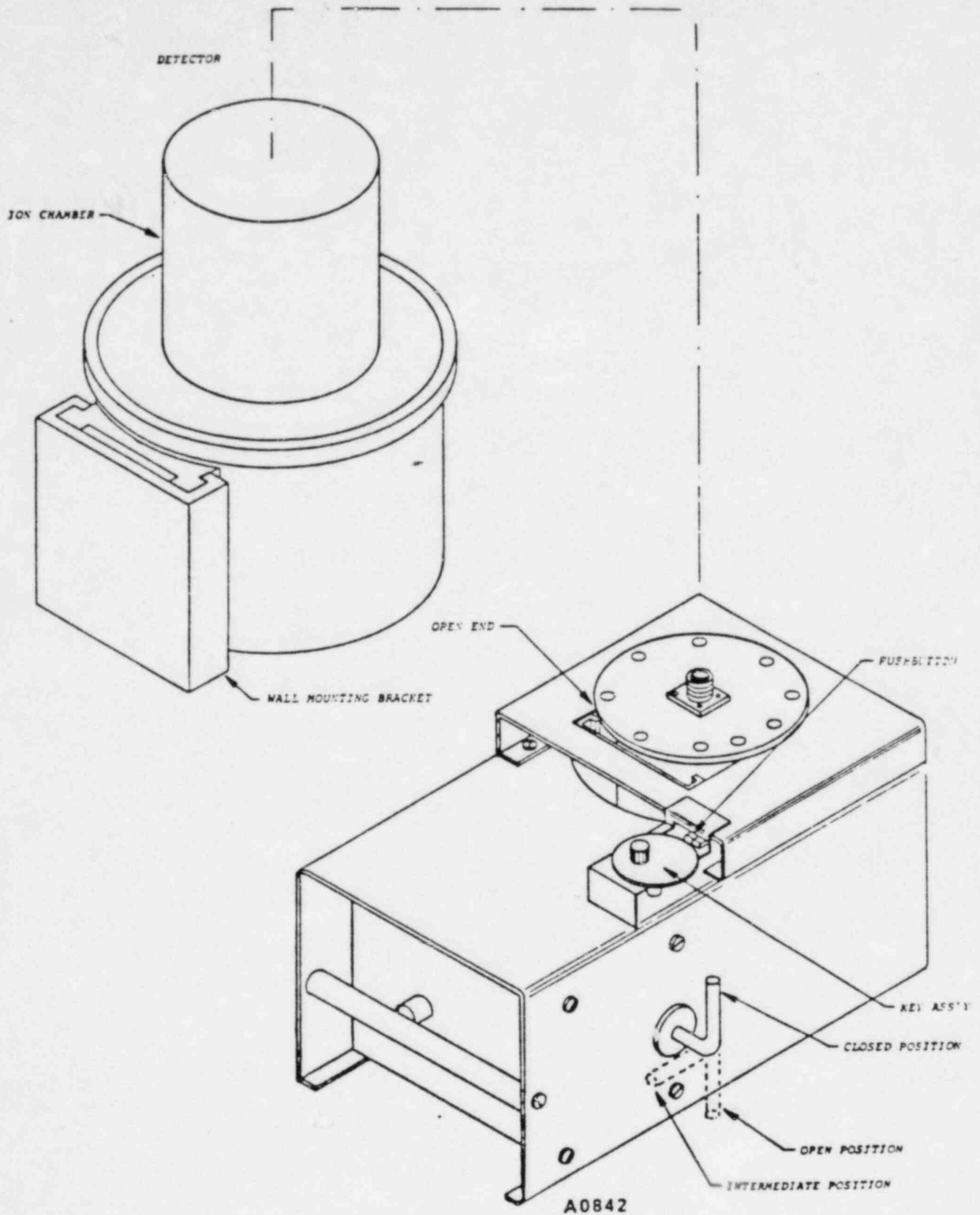


FIGURE 1. Mounting Arrangement of an 847 Type Detector in the Field Calibrator

These papers accompanied the shipment that left the Victoree plant on 9/24/82.

SRX

Rec'd 11/9/82

SRX

VICTOREEN, INC.
A SHELLER GLOBE CORPORATION SUBSIDIARY

NOTIFICATION OF SHIPMENT

VICTOREEN
CUSTOMER ORDER NO.
IP-F-PO-105
SHIP TO:

DATE ENTERED
11/30/81

CUSTOMER ORDER NUMBER
IP-F-PO-105

VICTOREEN ORDER NO.
470019

POWER AUTHORITY OF STATE OF NY 428861
WAREHOUSE INDIAN POINT #3
ENTRANCE, GATE, BLEAKLEY ST. RUN DATE 06/25/82
BUCHANAN, NY 10511

REFER TO OUR ORDER NO WHEN REPORTING DISCREPANCIES AND NOTIFY US IMMEDIATELY VICTOREEN, INC. 10101 WOODLAND AVE CLEVELAND OHIO 44130	
WEIGHT	
PALLETS	
CARTONS	
VIA	
DATE SHIPPED	
PACKED BY	

SOLD TO: POWER AUTHORITY OF THE STATE OF N Y
BOX 215
BUCHANAN, NY 10511

VICTOREEN B/L NO.
 PARTIAL SHIPMENT
 COMPLETE SHIPMENT

SHIP VIA: CHEAPEST OR BEST WAY

FREIGHT TERMS PREPAY AND ADD SUBJECT TO CONDITIONS ON REVERSE SIDE

ITEM NUMBER	VICTOREEN PART NUMBER	DESCRIPTION & CUSTOMER PART NO	QUANTITY	
			DUE	SHIPPED
1	470019-1	R.M.S.	100	100
2	470019-2	SAEM-4	1	0
1	MARK: P.C. IP-F-PO-105.			
2	SHIP ITEM # 2 ON 10/25/82. MARKS: IP-F-PO-105.			
3	F.C.S. CLEVELAND, IN ACCORDANCE WITH VICTOREEN			
4	QUOTATION 81-83A.			
5	.			
6	*PER SUPP: 6/25/82-ADDED ITEM # 2 AND COMMENTS.			
<p><i>Van Arnes</i></p> <p><i>With (Amelia) H Skids</i></p> <p><i>10/25/82</i></p> <p><i>Ed Buchholz</i></p>				
<p>NOTE: THIS ORDER HAS BEEN CHANGED & THIS IS A REVISED ORDER SET.</p>				
<p>SHIPPED SEP 24 1982</p>				

EXPORT S.

(Provide at least two copies to the airline)

SHIPPER'S CERTIFICATION FOR RADIOACTIVE MATERIALS

Two completed and signed copies of this certification shall be handed to the carrier.
(Use block letters)

WARNING: Failure to comply in all respects with the applicable regulations of the Department of Transportation, 49-CFR, CAB 82 and, for international shipments, the IATA Restricted Articles Regulations may be a breach of the applicable law, subject to legal penalties. This certification shall in no circumstance be signed by an IATA Cargo Agent or a consolidator for international shipments.

This shipment is within the limitations prescribed for: (mark one)

passenger aircraft And contains radioactive material intended for use in, or incident to, research, or medical diagnosis or treatment.

cargo-only aircraft

NATURE AND QUANTITY OF CONTENT

PACKAGE

PROPER SHIPPING NAME	RADIONUCLIDE	GROUP	FORM	ACTIVITY		CATEGORY	TRANSPORT INDEX	TYPE
FOR U.S. SHIPMENTS, SEE SECTION 2, CAB 82, TARIFF 6-D	NAME OR SYMBOL OF PRINCIPAL RADIOACTIVE CONTENT	GROUP NUMBER OF GROUPS I TO VII	CHEMICAL FORM AND PHYSICAL STATE (GAS/ LIQUID/SOLID), or SPECIAL FORM, or SPECIAL ENCAPSULATION	NUMBER OF "CURIES" or MILLI-CURIES	Number of Packages	I-WHITE or II-YELLOW or III-YELLOW LABEL	FOR YELLOW LABEL CATEGORIES ONLY	INDUSTRIAL or TYPE A, or TYPE B
844-16-6 Check Source Limited Quantity	¹³³ Ba	II	solid	0.005	Exempt Amount exempt from packaging and labeling			

ADDITIONAL INFORMATION REQUIRED FOR FISSILE MATERIALS ONLY

EXEMPTED FROM THE ADDITIONAL REQUIREMENTS FOR FISSILE MATERIALS SPECIFIED IN 7.1. OF PART 2 OF THE IATA RESTRICTED ARTICLES REGULATIONS
NAMES, PLUS QUANTITY IN GRAMS, OR CONCENTRATION OR ENRICHMENT IN U235:

NOT EXEMPTED: FISSILE CLASS I FISSILE CLASS II FISSILE CLASS III

Additional certificates obtained by the Shipper when necessary:

Special Form Encapsulation Certificate(s)
Type "B" Packaging Certificate(s)
Certificate(s) for Fissile Material

Certificate(s) for Large Radioactive Source
Government Approvals/Permits

Special Handling Information

I hereby certify that the contents of this consignment are fully and accurately described above by Proper Shipping Name and are classified, packed, marked, labelled and in proper condition for carriage by air according to applicable national governmental regulations, and for International Shipments, the current IATA Restricted Articles Regulations.

Name and full address of Shipper
Victoreen Inc.

Name and title of person signing Certification
Stanley J Kawecki

10101 Woodland Ave.

Radiation Safety Officer

Cleveland Ch 44104

Date

9-23-1982

Signature of the Shipper (see WARNING above)

Air Waybill No. *

Airport of Departure *

Airport of Destination *

EXHIBIT 3₂

This box is optional for completion by issuing carrier.

(Provide at least two copies to the airline)

SHIPPER'S CERTIFICATION FOR RADIOACTIVE MATERIALS

Two completed and signed copies of this certification shall be handed to the carrier.
(Use block letters)

WARNING: Failure to comply in all respects with the applicable regulations of the Department of Transportation, 49-CFR, CAB 82 and, for international shipments, the IATA Restricted Articles Regulations may be a breach of the applicable law, subject to legal penalties. This certification shall in no circumstance be signed by an IATA Cargo Agent or a consolidator for international shipments.

This shipment is within the limitations prescribed for: (mark one)

passenger aircraft And contains radioactive material intended for use in, or incident to, research, or medical diagnosis or treatment. cargo-only aircraft

NATURE AND QUANTITY OF CONTENT					PACKAGE			
PROPER SHIPPING NAME	RADIONUCLIDE	GROUP	FORM	ACTIVITY		CATEGORY	TRANSPORT INDEX	TYPE
FOR U.S. SHIPMENTS, SEE SECTION 2, CAB 82, TARIFF 5-D	NAME OR SYMBOL OF PRINCIPAL RADIOACTIVE CONTENT	GROUP NUMBER OF GROUPS I TO VII	CHEMICAL FORM AND PHYSICAL STATE (GAS/LIQUID/SOLID), or SPECIAL FORM, or SPECIAL ENCAPSULATION	NUMBER OF CURIES or MILLI-CURIES	Number of Packages	I—WHITE or II—YELLOW or III—YELLOW LABEL	FOR YELLOW LABEL CATEGORIES ONLY	INDUSTRIAL or TYPE A, or TYPE B
(2) 844-3-8 Check Source Limited Quantities NOS	¹³⁷ Cs	III	solid	0.008 0.016		Exempt amount	Exempt from packaging and labeling	

ADDITIONAL INFORMATION REQUIRED FOR FISSILE MATERIALS ONLY

EXEMPTED FROM THE ADDITIONAL REQUIREMENTS FOR FISSILE MATERIALS SPECIFIED IN 7.1. OF PART 2 OF THE IATA RESTRICTED ARTICLES REGULATIONS
NAMES: PLUS QUANTITY IN GRAMS, OR CONCENTRATION OR ENRICHMENT IN U235:

NOT EXEMPTED: FISSILE CLASS I FISSILE CLASS II FISSILE CLASS III

Additional certificates obtained by the Shipper when necessary:

Special Form Encapsulation Certificate(s) <input type="checkbox"/>	Certificate(s) for Large Radioactive Source <input type="checkbox"/>
Type "B" Packaging Certificate(s) <input type="checkbox"/>	Government Approvals/Permits <input type="checkbox"/>
Certificate(s) for Fissile Material <input type="checkbox"/>	

Special Handling Information

I hereby certify that the contents of this consignment are fully and accurately described above by Proper Shipping Name and are classified, packed, marked, labelled and in proper condition for carriage by air according to applicable national governmental regulations, and for International Shipments, the current IATA Restricted Articles Regulations.

Name and full address of Shipper

Victoreen Inc

Name and title of person signing Certification

Stanley J Kawecki

10101 Woodland Avs.

Radiation Safety Officer

Cleveland, OH 44104

Date

9-23-1982

Signature of the Shipper (see WARNING above)

Air Waybill No. *

Airport of Departure *

Airport of Destination *

EXHIBIT 53

85B-2	251	RAM 4022	} REMOTE ALARM
	259	RAM 4024	
	254	RAM 4023	
	252	RAM 4021	
857-10	1542	RAM 4023	} DETECTORS
	1544	RAM 4024	
	1543	RAM 4022	
	1540	RAM 4021	
50-100	4 PCS	25' EA	CABLE
848-8	1 PC	FIELD CAL	S/N 190
848-8-105	1 PC	FIELD CAL ADAPT BRACKET	
844-36	1 PC	STD GEOMETRY	S/N 140
844-13-9	1 PC	90 SR BUTTON SOURCE	S/N 294 C, E, F
844-13-6	1 PC	137 CS	" " 294 B
844-13-7	1 PC	133 BA	" " 294 A, D, G
844-36-14	1 PC	90 SR	UNIVERSITY SET S/N 294 G, H, I
844-36-15	1 PC	133 BA	" " S/N 294 D, E
	1 PC	RAM CP-40	
	1 PC	RAM DOUBLE END CABINET	RAM-4089

SRX

Customer | NY, Indian Point

Victoreen 50# ESS 470019

848-8 Serial# 190 114 mCi 137Cs

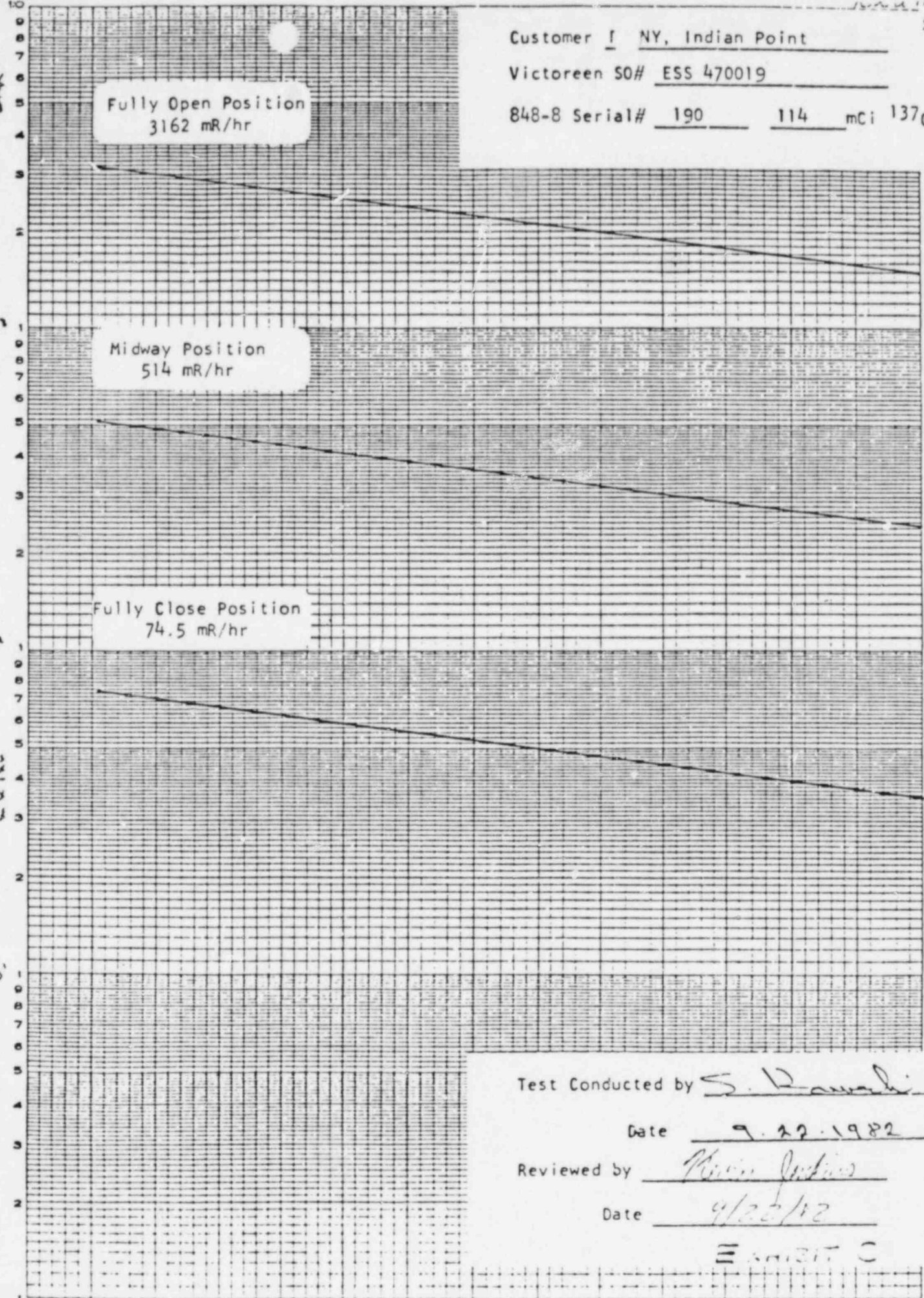
This sheet, and the leak test certificate, were sent with the calibrator on 9-24-82. SRX

Fully Open Position
3162 mR/hr

Midway Position
514 mR/hr

Fully Close Position
74.5 mR/hr

EXPOSURE RATE
mR/hr



Test Conducted by S. Dawah

Date 9.22.1982

Reviewed by Victoreen

Date 9/22/82

EXHIBIT C

1980 1985 1990 1995 2000 2005 2010 2015
YEAR

4 CYCLES X 10 DIVISIONS PER INCH
MEMO-LUDARIMETRIC
DISTANCE GRAPH SCALE

TO: Rick Long,
 From: S Kawecki
 Subj: Indian Point E 470017

Rec'd 11-9-82
 SRX

This is to clarify the identity of the Radioactive Button Sources shipped to PASN4 Indian Point, on 9.23.82.

Part No.	Isotope	Ser. No.	Activity
844.13.7	¹³⁷ Ba	294A	0.46 μ ci
844.13.6	¹³⁷ Cs	294B	0.31 μ ci
844.13.9	⁹⁰ Sr	294C	0.10 μ ci
844.36.15	¹³⁷ Ba	294D	1.54 μ ci
	¹³⁷ Ba	294E	0.160 μ ci
	¹³⁷ Ba	294F	0.0143 μ ci
	⁹⁰ Sr	294G	0.60 μ ci
	⁹⁰ Sr	294H	0.051 μ ci
844.36.14	⁹⁰ Sr	294I	0.0053 μ ci

These sheets were prepared by Victorien after the shipment reached Indian Point and were hand-carried by Rick Long to Indian Point on 10/6/82.

SRX

Enclosed are copies of the calibration certificates for the above sources.

I have also enclosed copies of the DOT Shipping Certificates. As the shipping department did not have the sources available, the certificates were typed utilizing example forms listing nominal activities. This would account for any discrepancies that exist.

Ernest J,
 STAM

SHIPPER'S CERTIFICATION FOR RADIOACTIVE MATERIALS

Two completed and signed copies of this certification shall be handed to the carrier.
(Use block letters)

WARNING: Failure to comply in all respects with the applicable regulations of the Department of Transportation, 49-CFR, CAB 82 and, for international shipments, the IATA Restricted Articles Regulations may be a breach of the applicable law, subject to legal penalties. This certification shall in no circumstance be signed by an IATA Cargo Agent or a consolidator for international shipments.

This shipment is within the limitations prescribed for: *(mark one)*
 passenger aircraft And contains radioactive material intended for use in, or incident to, research, or medical diagnosis or treatment. cargo-only aircraft

NATURE AND QUANTITY OF CONTENT					PACKAGE			
PROPER SHIPPING NAME	RADIONUCLIDE	GROUP	FORM	ACTIVITY	Number of Packages	CATEGORY	TRANSPORT INDEX	TYPE
FOR U.S. SHIPMENTS. SEE SECTION 2, CAB 82 TARIFF 6-D	NAME OR SYMBOL OF PRINCIPAL RADIOACTIVE CONTENT	GROUP NUMBER OF GROUPS I TO VII	CHEMICAL FORM AND PHYSICAL STATE (GAS/LIQUID/SOLID) or SPECIAL FORM or SPECIAL ENCAPSULATION	NUMBER OF XXXXXX MILLI-CURIES		I—WHITE or II—YELLOW or III—YELLOW LABEL	FOR YELLOW LABEL CATEGORIES ONLY	INDUSTRIAL or TYPE A, or TYPE B
RADIOACTIVE MATERIAL LIMITED QUANTITY N.O.S. 1 EA 844-36-14 NO LABELS REQUIRED JN# 2910	SR-90	II	SOLID	0.0006		SMALL QUANTITY EXEMPT FROM PACKAGING AND LABELLING		

ADDITIONAL INFORMATION REQUIRED FOR FISSILE MATERIALS ONLY

EXEMPTED FROM THE ADDITIONAL REQUIREMENTS FOR FISSILE MATERIALS SPECIFIED IN 7.1. OF PART 2 OF THE IATA RESTRICTED ARTICLES REGULATIONS NAMES, PLUS QUANTITY IN GRAMS, OR CONCENTRATION OR ENRICHMENT IN U235.

NOT EXEMPTED: FISSILE CLASS I FISSILE CLASS II FISSILE CLASS III

Additional certificates obtained by the Shipper when necessary:

Special Form Encapsulation Certificate(s) <input type="checkbox"/>	Certificate(s) for Large Radioactive Source <input type="checkbox"/>
Type "B" Packaging Certificate(s) <input type="checkbox"/>	Government Approvals/Permits <input type="checkbox"/>
Certificate(s) for Fissile Material <input type="checkbox"/>	

Special Handling Information

I hereby certify that the contents of this consignment are fully and accurately described above by Proper Shipping Name and are classified, packed, marked, labelled and in proper condition for carriage by air according to applicable national governmental regulations, and for International Shipments, the current IATA Restricted Articles Regulations.

Name and full address of Shipper VICTOREEN INC. 10101 WOODLAND AVENUE CLEVELAND OHIO 44104	Name and title of person signing Certification RADIATION AND SAFETY OFFICER STAN KAVECKI
----------------------------------------------------------------------------------------------------------------------------------	----------------------------------------------------------------------------------------------------------------------

Date 10/5/82	Signature of the Shipper (see WARNING above)
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Air Waybill No. *	Airport of Departure *	Airport of Destination * EXHIBIT D.
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SHIPPER'S CERTIFICATION FOR RADIOACTIVE MATERIALS

Two completed and signed copies of this certification shall be handed to the carrier.
(Use block letters)

WARNING: Failure to comply in all respects with the applicable regulations of the Department of Transportation, 49-CFR, CAB 82 and, for international shipments, the IATA Restricted Articles Regulations may be a breach of the applicable law, subject to legal penalties. This certification shall in no circumstance be signed by an IATA Cargo Agent or a consolidator for international shipments.

This shipment is within the limitations prescribed for: (mark one)

passenger aircraft And contains radioactive material intended for use in, or incident to, research, or medical diagnosis or treatment. cargo-only aircraft

NATURE AND QUANTITY OF CONTENT

PACKAGE

PROPER SHIPPING NAME	RADIONUCLIDE	GROUP	FORM	ACTIVITY	Number of Packages	CATEGORY	TRANSPORT INDEX	INDUSTRIAL or TYPE A or TYPE B
FOR U.S. SHIPMENTS, SEE SECTION 2, CAB 82, TARIFF 6-D	NAME OR SYMBOL OF PRINCIPAL RADIOACTIVE CONTENT	GROUP NUMBER OF GROUPS I TO VII	CHEMICAL FORM AND PHYSICAL STATE (GAS/LIQUID/SOLID), or SPECIAL FORM or SPECIAL ENCAPSULATION	NUMBER OF Curies MILLI-CURIES		I—WHITE or II—YELLOW or III—YELLOW LABEL	FOR YELLOW LABEL CATEGORIES ONLY	INDUSTRIAL or TYPE A or TYPE B
RADIOACTIVE MATERIAL LIMITED QUANTITY U.S. EA 844-13-6 EA 844-13-7 EA 844-13-9 NO LABELS REQUIRED UN#2910					SMALL QUANTITIES EXEMPT FROM PACKAGING AND LABELLING			

ADDITIONAL INFORMATION REQUIRED FOR FISSILE MATERIALS ONLY

EXEMPTED FROM THE ADDITIONAL REQUIREMENTS FOR FISSILE MATERIALS SPECIFIED IN 7.1. OF PART 2 OF THE IATA RESTRICTED ARTICLES REGULATIONS NAMES, PLUS QUANTITY IN GRAMS, OR CONCENTRATION OR ENRICHMENT IN U235:

NOT EXEMPTED: FISSILE CLASS I FISSILE CLASS II FISSILE CLASS III

Additional certificates obtained by the Shipper when necessary:

Special Form Encapsulation Certificate(s) <input type="checkbox"/>	Certificate(s) for Large Radioactive Source <input type="checkbox"/>
Type "B" Packaging Certificate(s) <input type="checkbox"/>	Government Approvals/Permits <input type="checkbox"/>
Certificate(s) for Fissile Material <input type="checkbox"/>	

Special Handling Information

I hereby certify that the contents of this consignment are fully and accurately described above by Proper Shipping Name and are classified, packed, marked, labelled and in proper condition for carriage by air according to applicable national governmental regulations, and for International Shipments, the current IATA Restricted Articles Regulations.

Name and full address of Shipper VETOREEM INC. 0101 WOODLAND AVENUE LLEVELAND, OHIO 44104	Name and title of person signing Certification RADIATION AND SAFETY OFFICER STAN KAWECKI
Date 10/5/82	Signature of the Shipper (see WARNING above)
Air Waybill No.*	Airport of Departure*
Airport of Destination* EXETER, NH	

SHIPPER'S CERTIFICATION FOR RADIOACTIVE MATERIALS

Two completed and signed copies of this certification shall be handed to the carrier.
(Use block letters)

WARNING: Failure to comply in all respects with the applicable regulations of the Department of Transportation, 49-CFR, CAB 82 and, for international shipments, the IATA Restricted Articles Regulations may be a breach of the applicable law, subject to legal penalties. This certification shall in no circumstance be signed by an IATA Cargo Agent or a consolidator for international shipments.

This shipment is within the limitations prescribed for: (mark one)
 passenger aircraft And contains radioactive material intended for use in, or incident to, research, or medical diagnosis or treatment. cargo-only aircraft

NATURE AND QUANTITY OF CONTENT					PACKAGE			
PROPER SHIPPING NAME	RADIOISOTOPE	GROUP	FORM	ACTIVITY	CATEGORY	TRANSPORT INDEX	TYPE	
FOR U.S. SHIPMENTS SEE SECTION 2, CAB 82, TARIFF 6-D	NAME OR SYMBOL OF PRINCIPAL RADIOACTIVE CONTENT	GROUP NUMBER (GROUPS I TO VII)	CHEMICAL FORM AND PHYSICAL STATE (GAS/LIQUID/SOLID) & SPECIAL FORM or SPECIAL ENCAPSULATION	NUMBER OF CURIES or MBQs	Number of Packages	I—WHITE or II—YELLOW or III—YELLOW LABEL	FOR YELLOW LABEL CATEGORIES ONLY	INDUSTRIAL or TYPE A or TYPE B
RADIOACTIVE MATERIAL U.S.S. EA 848-B FIELD CALIBRATOR RADIOACTIVE MATERIAL UN#2181	CS 137	III	SOLID	0.1	1	II YELLOW		

ADDITIONAL INFORMATION REQUIRED FOR FISSILE MATERIALS ONLY

EXEMPTED FROM THE ADDITIONAL REQUIREMENTS FOR FISSILE MATERIALS SPECIFIED IN 7.1. OF PART 2 OF THE IATA RESTRICTED ARTICLES REGULATIONS
 NAMES, PLUS QUANTITY IN GRAMS, OR CONCENTRATION OR ENRICHMENT IN U235:

NOT EXEMPTED: FISSILE CLASS I FISSILE CLASS II FISSILE CLASS III

Additional certificates obtained by the Shipper when necessary:

- | | |
|--------------------------------------------------------------------|----------------------------------------------------------------------|
| Special Form Encapsulation Certificate(s) <input type="checkbox"/> | Certificate(s) for Large Radioactive Source <input type="checkbox"/> |
| Type "B" Packaging Certificate(s) <input type="checkbox"/> | Government Approvals/Permits <input type="checkbox"/> |
| Certificate(s) for Fissile Material <input type="checkbox"/> | |

Special Handling Information

I hereby certify that the contents of this consignment are fully and accurately described above by Proper Shipping Name and are classified, packed, marked, labelled and in proper condition for carriage by air according to applicable national governmental regulations, and for International Shipments, the current IATA Restricted Articles Regulations.

Name and full address of Shipper	Name and title of person signing Certification
Victoreen Inc. 10101 Woodland Ave.	Stanley J. Kawaeki Radiation Safety Officer
Cleveland, OH 44104	

Date	Signature of the Shipper (see WARNING above)
Oct. 10, 1982	

Air Waybill No. *	Airport of Departure *	Airport of Destination *
		EXHIBIT 2

SHIPPER'S CERTIFICATION FOR RADIOACTIVE MATERIALS

Two completed and signed copies of this certification shall be handed to the carrier.
(Use block letters)

WARNING: Failure to comply in all respects with the applicable regulations of the Department of Transportation, 49-CFR, CAB 82 and, for international shipments, the IATA Restricted Articles Regulations may be a breach of the applicable law, subject to legal penalties. This certification shall in no circumstance be signed by an IATA Cargo Agent or a consolidator for international shipments.

This shipment is within the limitations prescribed for: (mark one)

passenger aircraft And contains radioactive material intended for use in, or incident to, research, or medical diagnosis or treatment. cargo-only aircraft

NATURE AND QUANTITY OF CONTENT

PACKAGE

PROPER SHIPPING NAME	RADIOISOTOPE	GROUP	FORM	ACTIVITY	Number of Packages	CATEGORY	TRANSPORT INDEX	INDUSTRIAL or TYPE A, or TYPE B
FOR U.S. SHIPMENTS, SEE SECTION 2, CAB 82, TARIFF 6-D	NAME OR SYMBOL OF PRINCIPAL RADIOACTIVE CONTENT	GROUP NUMBER OF GROUPS I TO VII	CHEMICAL FORM AND PHYSICAL STATE (GAS/LIQUID/SOLID) or SPECIAL FORM or SPECIAL ENCAPSULATION	NUMBER OF CURIES, or MILLI-CURIES		I--WHITE or II--YELLOW or III--YELLOW LABEL	FOR YELLOW LABEL CATEGORIES ONLY	INDUSTRIAL or TYPE A, or TYPE B
RADIOACTIVE MATERIAL LIMITED QUANTITY N.O.S.	BA-133	II	SOLID	0.002		SMALL QUANTITY EXEMPT FROM PACKAGING AND LABELLING		
1 EA 844-26-15								
0 LABELS REQUIRED								
# 2910								

ADDITIONAL INFORMATION REQUIRED FOR FISSILE MATERIALS ONLY

EXEMPTED FROM THE ADDITIONAL REQUIREMENTS FOR FISSILE MATERIALS SPECIFIED IN 7.1. OF PART 2 OF THE IATA RESTRICTED ARTICLES REGULATIONS
NAMES, PLUS QUANTITY IN GRAMS, OR CONCENTRATION OR ENRICHMENT IN U235:

NOT EXEMPTED: FISSILE CLASS I FISSILE CLASS II FISSILE CLASS III

Additional certificates obtained by the Shipper when necessary:

Special Form Encapsulation Certificate(s) Certificate(s) for Large Radioactive Source
Type "B" Packaging Certificate(s) Government Approvals/Permits
Certificate(s) for Fissile Material

Special Handling Information

I hereby certify that the contents of this consignment are fully and accurately described above by Proper Shipping Name and are classified, packed, marked, labelled and in proper condition for carriage by air according to applicable national governmental regulations, and for International Shipments, the current IATA Restricted Articles Regulations.

Name and full address of Shipper
VICTOREEN INC.

Name and title of person signing Certification
RADIATION AND SAFETY OFFICER

10101 WOODLAND AVENUE

CLEVELAND OHIO 44104

STAN KAWECKI

Date
10/5/82

Signature of the Shipper (see WARNING above)
[Signature]

Air Waybill No. *

Airport of Departure *

Airport of Destination *

EXHIBIT D5