

AUG 13 1990

Docket No. 030-31345  
License No. 04-12751-03

Isovac Engineering, Inc.  
932 Grand Central Avenue  
Glendale, California 91201

Attention: Mr. George R. Neff  
President

Subject: Decommissioning Rule

This is in reference to your letter dated June 4, 1990 and to our letter to you dated June 7, 1990, copies enclosed.

New guidance from NRC Headquarters indicates that your licensed activities will not be considered to be exempt from the Decommissioning Rule. Therefore, additional information is needed from you to demonstrate compliance with 10 CFR 30.35:

1. An indication of your costs incident to transferring Krypton-85 gas to your customers.
2. An indication of your costs to prepare and ship cylinders for return to your Glendale, California facility.
3. An evaluation of the costs involved with:
  - o operating the customer's ventilation system
  - o monitoring effluents to verify compliance with 10 CFR 20
  - o performing final facility surveys
4. Verification that adequate funding will be available in one of the forms indicated in 10 CFR 30.35(f).

Questions concerning these matters may be directed to B. Riedlinger at (415) 943-3765.

Sincerely,

*/s/ Robert J. Pate*

Robert J. Pate, Chief  
Nuclear Materials and  
Fuel Fabrication Branch

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REG5 LIC30  
04-12751-03 PDR

Enclosures:  
Letter dated June 4, 1990  
Letter dated June 7, 1990  
10 CFR Part 30

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bcc w/copy of letter dated 6/4/90  
and copy of letter dated 6/7/90:  
Docket File  
B. Faulkenberry  
J. Martin  
State of California

bcc w/o copies of letters:  
M. Smith  
J. Zollicoffer

REGION V  
BARiedlinger  
8/13/90 *RJP/for*

REQUEST COPY
<input checked="" type="radio"/> YES / NO

SEND TO PDR
<input checked="" type="radio"/> YES / NO

IsoVac Engineering Inc.

June 4, 1990

U.S. Nuclear Regulatory Commission  
Region V  
1450 Maria Lane, Suite 210  
Walnut Creek, CA 94596-5368

Attn: Beth A. Riedlinger

Subject: Decommissioning of Krypton-85 Systems

Reference: ByProduct Materials License No. 04-12751-03

Gentlemen:

Thank you for the telecon regarding the concerns which we have regarding the "Decommissioning Rule" for Kr<sup>85</sup> systems. We would like to request consideration for IsoVac to be exempted from that rule for the following reasons:

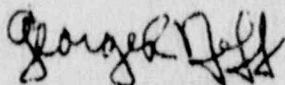
- 1) If we have any Krypton-85 gas, we will either:
  - a) Transfer it to our customers license when we install his Kr-85 handling system, or:
  - b) Transfer it to our California ByProduct Materials License.
- 2) We will release it in accordance with license criteria.

Since it is a noble gas, we feel that the proposed rule is not properly applicable to Krypton-85. We further do not see any direct association with the decommissioning costs for a transfer or release of the gas.

We would therefore feel that there should be some provision for exemption from the rule.

Please let us know how we may proceed further with this.

Very truly yours



George R. Neff  
President  
R.S.O.

932 grand central avenue, glendale, california 91201  
(818) 247-1431 (213) 245-1014 FAX (818) 241-0781

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NO  
SECTION V

IsoVac Engineering, Inc.

FAX TO: US NUCLEAR REGULATORY COMMISSION 90 JUN 5 A7:18

Attn: BETH A. RIEDLIGKE, Licensing

CC: \_\_\_\_\_ FAX No. 1-415-943-3804

FAX Reference No. 2568

Page 1 of 2

Date: June 4, 1990

From: George Neff

Subject: "Decommissioning Rule"

Reference: IsoVac License No. 04-12751-03

Beth:

Attached is a letter which is to express our concerns regarding the new rule.

Hopefully, we can see a way to eliminate the financial impacts of that rule, both for us and our customers, who are extremely concerned at this time.

We are already seeing a financial impact developing due to our customers wanting out of the ownership of our machines, and the threatened cancellation by other buyers.

Please let us know how we may help.

Thank you,

George

DOCKET FILE

JUN - 7 1990

Docket No.: 030-31345

License No.: 04-12751-03

Isovac Engineering, Inc.  
932 Grand Central Avenue  
Glendale, California 91021

Attention: Mr. George Neff  
President

Gentlemen:

This will acknowledge receipt of your letter dated June 4, 1990 which was submitted to comply with the Decommissioning Rule.

This letter will be added to License Condition 13. the next time a license amendment is required.

Beth A. Riedlinger  
Senior Health Physicist (Licensing)

bcc w/copy of letter dated 6/4/90:

docket file copy  
B. Faulkenberry  
J. Martin  
State of California

<sup>BAR</sup>  
BARiedlinger/dot  
6/7/90

REQUEST COPY  
YES /  NO

SEND TO PDR  
YES /  NO