

**VALENITE****GTE**

August 29, 1990

GTE Valenite Corporation  
750 Stephenson Highway  
P.O. Box 3950  
Troy, Michigan 48007-3950  
(313) 589-1000Roy Caniano  
Region 3  
Nuclear Regulatory Commission  
799 Roosevelt Road  
Glen Ellen, Illinois 60137*License File*  
21-174 36-01

Dear Mr. Caniano,

As we discussed by phone, I am providing notification of transfer of several promethium 147 sealed beta backscatter sources and gauging devices to Valenite International operations. Transfer of these sources and devices occurred over a period of years, in some instances up to 10 years ago. The sources which were transferred are summarized in Appendix A.

By disclosure of this information, Valenite intends to inform the NRC of the location and provide transfer notification of the outlined sources. Our interpretation of the regulations indicates that an export license is not required for generally licensed sources.

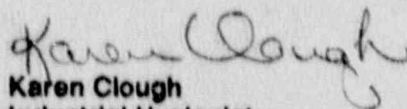
GTE Valenite is an international corporation which manufactures carbide metal cutting tools. Valenite utilizes sealed beta back scatter sources in gauging devices to determine the thickness of coatings on the carbide tool. As coating operations were opened in foreign countries, beta backscatter gauges and sources were shipped to these locations. Domestic Valenite purchased these materials and sent them to the international locations.

Each source has been accounted for. They are either in use, disposed of through the supplier representative in-country, or disposed of by an in-country regulatory agency, similar to the NRC. Documentation for all activities is maintained. Records of purchase, leak testing, transfer, and disposal for all Valenite sources are retained in the Corporate offices. A training program for all employees who handle or use these sources has been developed.

We currently utilize in-country supplier representatives for all international locations, with the exception of Venezuela. The representative's address in Venezuela given by the supplier does not exist. Where available, purchase, leak testing, and disposal is handled by the in-country supplier representative.

I can be reached at 313/589-6040. Please do not hesitate to call me if you have any questions.

Sincerely,

  
Karen Clough  
Industrial Hygienist9011130230 901024  
REG3 LIC30  
21-17436-01 PDC

Appendix A

Australia

14433 4-77 Date of purchase. Disposed of by supplier representative in Australia in 7-87.

This location has used the supplier representative in Australia for purchase and disposal of sources since 1987. The Health Department Victoria performs leak testing, as the supplier representative does not provide this service.

Brazil

14613 8-77 Date of purchase. Disposed of by the CNEN (Comissao Nacional De Energia Nuclear, the Brazilian nuclear regulatory agency) in 1989.

14827 8-78 Date of purchase. Disposed of by the CNEN in 1989.

This location has used the supplier representative in Brazil for purchase and leak testing of sources since 1988. The CNEN disposed of the old sources as the supplier representative would not handle the transaction.

Japan

14795 3-80 Japan received source with the microderm unit. Disposed of by the supplier representative in Japan in 1-90.

24099 10-80 Japan received source. Disposed of by supplier representative in 1-90.

24323 10-80 Japan received source. Disposed of by supplier representative in 1-90.

34323 Japan received source prior to 1987. Disposed of by supplier representative.

34875 11-88 Japan received source. Currently in use.

This location has used the supplier representative in Japan for leak testing and disposal since the beginning of 1990. Future purchase of sources will be handled through the supplier representative in Japan.

Venezuela

24003 3-82 Sent to Venezuela. Disposed of by IVIC (Instituto Venezolano de Investigaciones Cientificas, a Venezuelan regulatory agency) in 10-88.

34339 6-84 Sent to Venezuela. Disposed of by IVIC in 10-88.

24336 6-87 Sent to Venezuela. Currently in use.

44093 1-89 Sent to Venezuela. Currently in use.

The address given by the supplier for their supplier representative in Venezuela does not exist. Venezuela has been informed to have the supplier in the United States send the source directly to their location.