



GE Lighting

General Electric Company
Nela Park, Cleveland, OH 44112

November 7, 1990

A. Bert Davis
Regional Administrator
U.S.N.R.C., Region III
799 Roosevelt Road
Glen Ellyn, IL 60137

Re: Demand for Information, Docket No. 03005606

Dear Mr. Davis:

The above referenced Demand for Information concerns the recent requirement to submit either a decommissioning funding plan or a certification of financial assurance for decommissioning under 10 CFR Part 30.35. Included in Part 30.35 is a series of thresholds which, when exceeded, require the above certification or submissions.

Our license (Byproduct Materials License No. 34-00054-06) referenced by the above docket number covers the use of material in sealed sources. This license has been recently amended to include two new conditions (22 and 23) which require that we restrict our possession of material below the minimum limits specified in 10 CFR 30.35(d) and that we maintain records of information considered to be important to decommissioning. At no time prior to the addition of these conditions to our license had we been in excess of the minimum limits requiring decommissioning assurance for material under this license. A copy of our complete license is attached for your reference.

Based on the above information and our license conditions, we believe that 10 CFR Part 30.35 does not apply to us in regards to this license.

If you or members or your staff have any questions concerning our activities under this license, please contact me.

A. M. Zielinski
Lighting Environmental, Health
and Safety Department

Attachments

xc: R.N. Cotman #1350
Director
Division of Low-Level Waste
Management and Decommissioning
Office of Nuclear Material Safety
and Safeguards
U.S.N.R.C.
Washington, DC 20555

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SWORN to before me and subscribed in my presence this 9th day of
November, 1990

DENISE EILEEN LABANT
Notary Public, State of Ohio
My Commission Expires March 17, 1993
(Recorded in Lake County)

**MATERIALS LICENSE
SUPPLEMENTARY SHEET**

License number	34-00054-06
Docket or Reference number	030-05606
Amendment No.	39

General Electric Company
Lighting Business Group
Nela Park
Cleveland, OH 44112

In accordance with letter dated September 5, 1990, License Number 34-00054-06 is amended as follows:

Items 6., 7., 8. and 9. are amended to add:

- | | | |
|---|--|--|
| 6. Byproduct, source, and/or special nuclear material | 7. Chemical and/or physical form | 8. Maximum amount that licensee may possess at any one time under this license |
| G. Iron-55 | G. Sealed source (Amersham Model IEC.A1 or New England Nuclear Model NER-460A) | G. No single source to exceed 40 millicuries |
| H. Curium-244 | H. Sealed source (Amersham Model CLCL) | H. No single source to exceed 10 millicuries |

Authorized Use

G. and H. To be used in a Princeton Gamma Tech. Model 820 x-ray fluorescence analyzer for chemical analysis.

Condition 21. is amended to read:

21. Except as specifically provided otherwise in this license, the licensee shall conduct its program in accordance with the statements, representations, and procedures contained in the documents including any enclosures, listed below. The Nuclear Regulatory Commission's regulations shall govern unless the statements, representations and procedures in the licensee's application and correspondence are more restrictive than the regulations.
- A. Application dated April 8, 1987; and
 - B. Letters dated April 7, 1987 and September 5, 1990.

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**MATERIALS LICENSE
SUPPLEMENTARY SHEET**

License number

34-00054-06

Docket or Reference number

030-05606

Amendment No. 34

Conditions 22. and 23. are added:

- 22. In addition to the possession limits in Item 8, the licensee shall further restrict the possession of licensed material to quantities below the minimum limit specified in 10 CFR 30.35(d) for establishing decommissioning financial assurance.
- 23. The licensee shall maintain records of information important to safe and effective decommissioning at Hela Park, Cleveland, Ohio per the provisions of 10 CFR 30.35(y) until this license is terminated by the Commission.

For the U.S. Nuclear Regulatory Commission

Date: October 23, 1990

By Sharon A. Pisma
Materials Licensing Section, Region III

MATERIALS LICENSE

Amendment No. 38

Pursuant to the Atomic Energy Act of 1954, as amended, the Energy Reorganization Act of 1974 (Public Law 93-438), and Title 10, Code of Federal Regulations, Chapter I, Parts 30, 31, 32, 33, 34, 35, 40 and 70, and in reliance on statements and representations heretofore made by the licensee, a license is hereby issued authorizing the licensee to receive, acquire, possess, and transfer byproduct, source, and special nuclear material designated below; to use such material for the purpose(s) and at the place(s) designated below; to deliver or transfer such material to persons authorized to receive it in accordance with the regulations of the applicable Part(s). This license shall be deemed to contain the conditions specified in Section 183 of the Atomic Energy Act of 1954, as amended, and is subject to all applicable rules, regulations and orders of the Nuclear Regulatory Commission now or hereafter in effect and to any conditions specified below.

Licensee		In accordance with application dated April 8, 1987	
1. General Electric Company Lighting Business Group		3. License number 34-00054-06 is amended in its entirety to read as follows:	
2. Nela Park Cleveland, OH 44112		4. Expiration date	May 31, 1992
		5. Docket or Reference No.	030-05606
6. Byproduct, source, and/or special nuclear material	7. Chemical and/or physical form	8. Maximum amount that licensee may possess at any one time under this license	
A. Cesium-137	A. Sealed sources which have been evaluated and approved for licensing purposes and authorized for distribution under a specific license issued by the Commission or an Agreement State	A. See Item 9.A.	
B. Cobalt-60	B. Sealed sources which have been evaluated and approved for licensing purposes and authorized for distribution under a specific license issued by the Commission or an Agreement State	B. See Item 9.B.	
C. Nickel-63	C. Foil sources in detector cells which have been evaluated and approved for licensing purposes and authorized for distribution under a specific license issued by the Commission or an Agreement State	C. No single detector cell to exceed 15 millicuries	

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MATERIALS LICENSE
SUPPLEMENTARY SHEET

License number

34-00054-06

Docket or Reference number

030-05606

Amendment No. 38

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|---|---|--|
| 6. Byproduct, source, and/or special nuclear material | 7. Chemical and/or physical form | 8. Maximum amount that licensee may possess at any one time under this license |
| D. Hydrogen-3 | D. Foil sources in detector cells which have been evaluated and approved for licensing purposes and authorized for distribution under a specific license issued by the Commission or an Agreement State | D. No single detector cell to exceed 1 curie |
| E. Cesium-137 | E. Sealed source (Technical Operations Model 77302) | E. One source not to exceed 150 millicuries |
| F. Hydrogen-3 | F. Sealed sources | F. 2 curies total |

9. Authorized Use

- A. and B. For possession and use in non-portable gauging devices which have been evaluated and approved for licensing purposes and have been authorized for distribution under a license issued by the Commission or an Agreement State.
- C. and D. For possession and use in gas chromatographs for sample analysis.
- E. For possession and use in a Technical Operations Model 773 instrument calibrator for calibrating survey instruments owned by General Electric.
- F. For storage only.

CONDITIONS

10. Licensed material may be used only at the licensee's facilities as listed below:

Nela Park
Cleveland, OHBridgeville Glass
Mayer Street
Bridgeville, PANiles/Mahoning Glass
403 N. Main Street
Niles, OHConneaut Base
Rieg & Maple Avenue
Conneaut, OHTungsten Products
21800 Tungsten Road
Euclid, OHLogan Glass
Zanesville Avenue
Logan, OHWilloughby
Campbell Road
Willoughby, OH

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11. Licensed material shall be used by or under the supervision of individuals who have completed the training program as described in letter dated April 7, 1987 and application dated April 8, 1987 and who have been designated by the licensee's Radiation Protection Officer. The licensee shall maintain records of the individuals who have been designated as authorized users.
12. Installation, initial radiation survey, relocation, or removal from service of devices containing sealed sources shall be performed by trained General Electric Company personnel or by persons specifically licensed by the Commission or an Agreement State to perform such services. Maintenance and repair of devices and installation, replacement, and disposal of sealed sources shall be performed only by persons specifically licensed by the Commission or an Agreement State to perform such services.
13. A.
 - (1) Each sealed source containing licensed material, other than Hydrogen-3, with a half-life greater than thirty days and in any form other than gas shall be tested for leakage and/or contamination at intervals not to exceed six months; except those sealed sources as specified by the manufacturer and specifically authorized by the Commission or an Agreement State may be leak tested at intervals not to exceed three years. In the absence of a certificate from a transferor indicating that a test has been made within six months prior to the transfer, a sealed source received from another person shall not be put into use until tested.
 - (2) Notwithstanding the periodic leak test required by this condition, any licensed sealed source is exempt from such leak test when the source contains 100 microcuries or less of beta and/or gamma emitting material or 10 microcuries or less of alpha emitting material.
- B. Tests for leakage and/or contamination shall be performed by the licensee or by other persons specifically licensed by the Commission or an Agreement State to perform such services.
14. Sealed sources containing licensed material shall not be opened or removed from source holders by the licensee.
15. The licensee shall conduct a physical inventory every 6 months to account for all sources and/or devices received and possessed under the license. Records of inventories shall be maintained for 2 years from the date of each inventory.
16. In lieu of using the conventional radiation caution colors (magenta or purple on yellow background) as provided in Section 20.203(a)(1), of 10 CFR Part 20, the licensee is hereby authorized to label detector cells and cell baths, containing licensed material and used in gas chromatography devices, with conspicuously etched or stamped radiation caution symbols without a color requirement.

**MATERIALS LICENSE
SUPPLEMENTARY SHEET**

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- 17. Detector cells containing titanium tritide foil shall only be used in conjunction with a properly operating temperature control mechanism which prevents foil temperatures from exceeding 225 degrees Centigrade.
- 18. Detector cells containing scandium tritide foil shall only be used in conjunction with a properly operating temperature control mechanism which prevents foil temperatures from exceeding 325 degrees Centigrade.
- 19. The licensee may transport licensed material in accordance with the provisions of 10 CFR Part 71, "Packaging and Transportation of Radioactive Material".
- 20. The licensee may make minor changes in the Lighting Business Group Radiation Safety Manual that are administrative and are not potentially important to safety, and may change the manual to adopt model radiation safety procedures published in NRC Regulatory Guides.
- 21. Except as specifically provided otherwise in this license, the licensee shall conduct its program in accordance with the statements, representations, and procedures contained in the documents including any enclosures, listed below. The Nuclear Regulatory Commission's regulations shall govern unless the statements, representations and procedures in the licensee's application and correspondence are more restrictive than the regulations.
 - A. Application dated April 8, 1987; and
 - B. Letter dated April 7, 1987.

For the U.S. Nuclear Regulatory Commission

Date April 28, 1987

By Evelyn R. Matson
Materials Licensing Section, Region III