



FOIA — 94-9 &amp; 94-69

## RESPONSE TYPE

☒ FINAL ☐ PARTIAL

DATE

MAR 17 1994

DOCKET NUMBER(S) (if applicable)

RESPONSE TO FREEDOM OF  
INFORMATION ACT (FOIA) REQUEST

REQUESTER

Ms. Penelope Wotherspoon

## PART I.—AGENCY RECORDS RELEASED OR NOT LOCATED (See checked boxes)

☐ No agency records subject to the request have been located.☐ No additional agency records subject to the request have been located.☐ Requested records are available through another public distribution program. See Comments section.☒ Agency records subject to the request that are identified in Appendix(es) A are already available for public inspection and copying at the NRC Public Document Room, 2120 L Street, N.W., Washington, DC.☒ Agency records subject to the request that are identified in Appendix(es) B are being made available for public inspection and copying at the NRC Public Document Room, 2120 L Street, N.W., Washington, DC, in a folder under this FOIA number.☐ The nonproprietary version of the proposal(s) that you agreed to accept in a telephone conversation with a member of my staff is now being made available for public inspection and copying at the NRC Public Document Room, 2120 L Street, N.W., Washington, DC, in a folder under this FOIA number.☐ Agency records subject to the request that are identified in Appendix(es) \_\_\_\_\_ may be inspected and copied at the NRC Local Public Document Room identified in the Comments section.☐ Enclosed is information on how you may obtain access to and the charges for copying records located at the NRC Public Document Room, 2120 L Street, N.W., Washington, DC.☒ Agency records subject to the request are enclosed.☐ Records subject to the request have been referred to another Federal agency(ies) for review and direct response to you.☒ Fees: \$☐ You will be billed by the NRC for fees totaling \$ \_\_\_\_\_.☐ You will receive a refund from the NRC in the amount of \$ \_\_\_\_\_.☐ In view of NRC's response to this request, no further action is being taken on appeal letter dated \_\_\_\_\_, No. \_\_\_\_\_.

## PART II. A—INFORMATION WITHHELD FROM PUBLIC DISCLOSURE

☒ Certain information in the requested records is being withheld from public disclosure pursuant to the exemptions described in and for the reasons stated in Part II, B, C, and D. Any released portions of the documents for which only part of the record is being withheld are being made available for public inspection and copying in the NRC Public Document Room, 2120 L Street, N.W., Washington, DC in a folder under this FOIA number.

## COMMENTS

\* The search time required to process your request did not exceed two free hours and reproduction did not exceed 100 free pages. Consequently, you will not be billed by NRC for processing.

No agency records have been located regarding a license for the American Health Foundation or naming Loretta Greenholtz as a RSO (radiation safety officer).

No agency records have been located regarding a license for the New Jersey University of Medicine and Dentistry. However, we have enclosed a copy of Materials License No. SNM-1995, Amendment No. 2 (dated 2/24/93) which names Herbert P. Michael as the RSO at Columbia University.

SIGNATURE, DIRECTOR, DIVISION OF FREEDOM OF INFORMATION AND PUBLICATIONS SERVICES

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**RESPONSE TO FREEDOM OF  
INFORMATION ACT (FOIA) REQUEST  
(CONTINUATION)**

FOIA NUMBER(S)

**FOIA** —

**94-9  
&  
94-69**

DATE

**MAR 17 1994**

**PART II. B — APPLICABLE EXEMPTIONS**

Records subject to the request that are described in the enclosed Appendix(es) **C** are being withheld in their entirety or in part under the Exemption No.(s) and for the reason(s) given below pursuant to 5 U.S.C. 552(b) and 10 CFR 9.17(a) of NRC regulations.

1. The withheld information is properly classified pursuant to Executive Order. (Exemption 1)

2. The withheld information relates solely to the internal personnel rules and procedures of NRC. (Exemption 2)

3. The withheld information is specifically exempted from public disclosure by statute indicated. (Exemption 3)

Sections 141-145 of the Atomic Energy Act, which prohibits the disclosure of Restricted Data or Formerly Restricted Data (42 U.S.C. 2161-2165).

Section 147 of the Atomic Energy Act, which prohibits the disclosure of Unclassified Safeguards Information (42 U.S.C. 2167).

4. The withheld information is a trade secret or commercial or financial information that is being withheld for the reason(s) indicated. (Exemption 4)

The information is considered to be confidential business (proprietary) information.

The information is considered to be proprietary information pursuant to 10 CFR 2.790(d)(1).

The information was submitted and received in confidence pursuant to 10 CFR 2.790(d)(2).

5. The withheld information consists of interagency or intraagency records that are not available through discovery during litigation. (Exemption 5), Applicable Privilege:

Deliberative Process. Disclosure of predecisional information would tend to inhibit the open and frank exchange of ideas essential to the deliberative process. Where records are withheld in their entirety, the facts are inextricably intertwined with the predecisional information. There also are no reasonably segregable factual portions because the release of the facts would permit an indirect inquiry into the predecisional process of the agency.

Attorney work-product privilege. (Documents prepared by an attorney in contemplation of litigation.)

Attorney-client privilege. (Confidential communications between an attorney and his/her client.)

**X** 6. The withheld information is exempted from public disclosure because its disclosure would result in a clearly unwarranted invasion of personal privacy. (Exemption 6)

7. The withheld information consists of records compiled for law enforcement purposes and is being withheld for the reason(s) indicated. (Exemption 7)

Disclosure could reasonably be expected to interfere with an enforcement proceeding because it could reveal the scope, direction, and focus of enforcement efforts, and thus could possibly allow recipients to take action to shield potential wrongdoing or a violation of NRC requirements from investigators. (Exemption 7 (A))

Disclosure would constitute an unwarranted invasion of personal privacy. (Exemption 7 (C))

The information consists of names of individuals and other information the disclosure of which could reasonably be expected to reveal identities of confidential sources. (Exemption 7 (D))

OTHER

**PART II. C — DENYING OFFICIALS**

Pursuant to 10 CFR 9.25(b) and/or 9.25(c) of the U.S. Nuclear Regulatory Commission regulations, it has been determined that the information withheld is exempt from production or disclosure, and that its production or disclosure is contrary to the public interest. The persons responsible for the denial are those officials identified below as denying officials and the Director, Division of Freedom of Information and Publications Services, Office of Administration, for any denials that may be appealed to the Executive Director for Operations (EDO).

DENYING OFFICIAL	TITLE/OFFICE	RECORDS DENIED	APPELLATE OFFICIAL		
			EDO	SECRETARY	IG
Thomas T. Martin	Regional Administrator USNRC Region I	Portions of documents in Appendix C	<b>X</b>		

**PART II. D — APPEAL RIGHTS**

The denial by each denying official identified in Part II.C may be appealed to the Appellate Official identified there. Any such appeal must be made in writing within 30 days of receipt of this response. Appeals must be addressed, as appropriate, to the Executive Director for Operations, to the Secretary of the Commission, or to the Inspector General, U.S. Nuclear Regulatory Commission, Washington, DC 20555, and should clearly state on the envelope and in the letter that it is an "Appeal from an Initial FOIA Decision."

**APPENDIX A**  
**DOCUMENTS AVAILABLE IN THE PDR**

NUMBER	DATE	DESCRIPTION
1.	11/24/92	U.S.N.R.C. Materials License No. SNM-1995, Amendment 1 (3 pages) [PDR #9301190352; Fiche 64597: frames 224-243]
2.	7/14/93	Routine Inspection No. 070-03074/93-001 signed by J. Kinneman to L. Greenholtz (4 pages) [PDR #9308090060; Fiche 76020: frames 091-094]
3.	2/24/93	U.S.N.R.C. Materials License No. SNM-1995, Amendment 2 (3 pages) [PDR #9307010070; Fiche 75546: frames 145-169]

## APPENDIX B

## DOCUMENTS BEING PLACED IN THE PDR

NUMBER	DATE	DESCRIPTION
1.	6/30/92	Letter from P. Carter to Dr. Costello (1 page)
2.	6/30/92	Letter re: License No. SNM-870 from N. Wotherspoon to F. Costello (7 pages)

APPENDIX C  
DOCUMENTS PARTIALLY WITHHELD

NUMBER	DATE	DESCRIPTION
1.	8/21/92	Letter requesting a license amendment from N. Wotherspoon to S. Arredondo (14 pages) [Exemption (b)(6)]
2.	12/7/92	Letter re Material License No. SNM-1995 from L. Greenholtz to S. Baggett (15 pages) [Exemption (b)(6)]

## MATERIALS LICENSE

Amendment No. 01

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, 39, 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 letter dated August 21, 1992,	
1. Columbia University		3. License number SNM-1995 is amended in its entirety to read as follows:	
2. 289 Engineering Terrace 500 West 120th Street New York, New York 10027		4. Expiration date August 31, 1997	
		5. Docket or Reference No. 070-03074; 070-00882	
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. Uranium enriched in Uranium 235 isotope to less than 99.99% Uranium 235	A. Plated electrodes in two fission counters	A. 2.37 grams	
B. Uranium enriched in Uranium 235 isotope to less than 99.99% Uranium 235	B. Foils	B. 286 grams	
C. Plutonium 239	C. Sealed neutron sources	C. Not to exceed 80 grams per source and 363 grams total	
D. Plutonium 239	D. Plated detector sources	D. 0.81 grams	
E. Uranium 233	E. Liquid	E. 0.035 grams	
9. Authorized use			
A. For storage only.			
B. For storage only.			
C. For use in teaching and training of students; calibration of instruments.			
D. For storage only.			
E. For storage only. 120175			

## CONDITIONS

10. Licensed material may be used only at licensee's facilities at Columbia University in the City of New York bounded by 114th Street and 120th Street between Broadway and Amsterdam Avenues, New York, New York, Barnard College bounded by 116th Street and 120th Street between Broadway and Riverside Drive, New York, New York, and Nevis Cyclotron Laboratory, Irvington, New York.
11. A. Licensed material shall be used by, or under the supervision of, individuals designated by the Radiation Safety Committee, David Brenner, Ph.D., Chairman.
- B. The Radiation Safety Officer for this license is Neil Wotherspoon, Ph.D.

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**MATERIALS LICENSE  
SUPPLEMENTARY SHEET**

License number

SNM-1995

Docket or Reference number

070-03074

Amendment No. 01

(Continued)

**CONDITIONS**

12. A. Sealed sources and detector cells shall be tested for leakage and/or contamination at intervals not to exceed 6 months or at such other intervals as are specified by the certificate of registration referred to in 10 CFR 32.210, not to exceed 3 years.
- B. Notwithstanding Paragraph A of this Condition, sealed sources designed to emit alpha particles shall be tested for leakage and/or contamination at intervals not to exceed 3 months.
- C. 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 or detector cell received from another person shall not be put into use until tested.
- D. Each sealed source fabricated by the licensee shall be inspected and tested for construction defects, leakage, and contamination prior to any use or transfer as a sealed source.
- E. Sealed sources and detector cells need not be leak tested if:
  - (i) they contain only hydrogen, <sup>3</sup>H, or
  - (ii) they contain only a gas; or
  - (iii) the half-life of the isotope is 30 days or less; or
  - (iv) they contain not more than 100 microcuries of beta and/or gamma emitting material or not more than 10 microcuries of alpha emitting material; or
  - (v) they are not designed to emit alpha particles, are in storage, and are not being used. However, when they are removed from storage for use or transfer to another person, and have not been tested within the required leak test interval, they shall be tested before use or transfer. No sealed source or detector cell shall be stored for a period of more than 10 years without being tested for leakage and/or contamination.
- F. The test shall be capable of detecting the presence of 0.005 microcurie of radioactive material on the test sample. Records of leak test results shall be kept in units of microcuries and shall be maintained for inspection by the Commission. If the test reveals the presence of 0.005 microcurie or more of removable contamination, a report shall be filed with the U.S. Nuclear Regulatory Commission and the source shall be removed from service and decontaminated, repaired, or disposed of in accordance with Commission regulations. The report shall be filed within 5 days of the date the leak test result is known with the U.S. Nuclear Regulatory Commission, Region I, ATTN: Chief, Nuclear Materials Safety Branch, 475 Allendale Road, King of Prussia, Pennsylvania 19406. The report shall specify the source involved, the test results, and corrective action taken.

MATERIALS LICENSE  
SUPPLEMENTARY SHEET

License number

SNM-1995

Docket or Reference number

070-03074

Amendment No. 01

(12. continued)

## CONDITIONS

6. The licensee is authorized to collect leak test samples for analysis by the licensee. Alternatively, tests for leakage and/or contamination may be performed by persons specifically licensed by the Commission or an Agreement State to perform such services.
13. Sealed sources or detector cells containing licensed material shall not be opened or sources removed from source holders or detector cells by the licensee.
14. 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 5 years from the date of each inventory.
15. The licensee is exempted from the requirements of 10 CFR 20.24.
16. 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 November 6, 1991
- B. Letter dated June 30, 1992
- C. Letter dated August 21, 1992

Date

NOV 24 1992

For the U.S. Nuclear Regulatory Commission

Original Signed By:

By

Elizabeth Uilrich

Nuclear Materials Safety Branch  
Region I

King of Prussia, Pennsylvania 19406

JUL 14 1993

Docket No. 070-03074

License No. SNM-1995

Columbia University  
ATTN: Loretta A. Greenholtz  
Director of Environmental Health  
and Safety  
500 W. 120th Street  
New York, New York 10027

Dear Mrs. Greenholtz:

SUBJECT: Routine Inspection No. 070-03074/93-001

On June 10, 1993, Mr. C.T. Oberg of this office conducted a routine safety inspection at the above address of activities authorized by the above listed NRC license. The inspection was an examination of your licensed activities as they relate to radiation safety and to compliance with the Commission's regulations and the license conditions. The inspection consisted of observations by the inspector, interviews with personnel, and a selective examination of representative records. The findings of the inspection were discussed with you and Mr. Herbert P. Michael at the conclusion of the inspection.

Based on the results of this inspection, it appears that your activities were not conducted in full compliance with NRC requirements. A Notice of Violation is enclosed as Appendix A and categorizes each violation by severity level in accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (Enforcement Policy). You are required to respond to this letter and in preparing your response, you should follow the instructions in Appendix A.

Please use the enclosed self-addressed green envelope when you respond to this letter to assist us in the timely processing of your response. In accordance with Section 2.790 of NRC's "Rules of Practice," Part 2, Title 10, Code of Federal Regulations, a copy of this letter and your reply will be placed in the Public Document Room. The responses directed by this letter and the accompanying Notice are not subject to the clearance procedures of the Office of Management and Budget as required by the Paperwork Reduction Act of 1980, PL 96-511.

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REGION I

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Your cooperation with us is appreciated.

Sincerely,

**Original Signed By:  
John D. Kinneman**

John D. Kinneman, Chief  
Research, Development &  
Decommissioning Section  
Division of Radiation Safety  
and Safeguards

Enclosure: Appendix A, Notice of Violation

cc:

Public Document Room (PDR)  
Nuclear Safety Information Center (NSIC)  
Herbert P. Michael, Radiation Safety Officer  
State of New York

bcc:

Region I Docket Room (w/concurrences)  
D. J. Holody, RI  
C. T. Oberg, RI

DRSS:RI  
Oberg/gc

7/8/93

DRSS:RI  
Kinneman

7/13/93

## APPENDIX A

### NOTICE OF VIOLATION

Columbia University  
New York, New York 10027

Docket No. 070-03074  
License No. SNM-1995

As a result of the inspection conducted on June 10, 1993, and in accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (Enforcement Policy) (1993), the following violations were identified:

1. 10 CFR 70.3 requires that no person possess or use special nuclear material except as authorized in a license issued by the Commission pursuant to these regulations.

Contrary to the above, as of June 10, 1993, Columbia University possessed 4 grams of uranium 233, a special nuclear material not authorized in License No. SNM-1995, without a valid license. This material was stored in a three drawer steel safe located in the Engineering Terrace Floor 2 Waste Storage Room and was identified in an undated inventory possibly conducted during the third or fourth quarter of 1992.

This is a Severity Level IV violation. (Supplement VI)

2. Condition 16 of License No. SNM-1995 requires that licensed material be possessed and used in accordance with the statements, representations, and procedures contained in an application dated November 6, 1991.

Appendix Item 10, Section C, page 16, of this application, requires that the Health Physics Officer conduct radiation level and contamination surveys, and safety audits, on a semiannual schedule. Appendix Item 10, Section D, page 17 - AREA SURVEY, Subsection A, Health Physics Office requires that monthly surveys be conducted, and Subsection B, page 18 Responsible Investigators Laboratories, requires that areas used only for waste storage be surveyed quarterly.

Contrary to the above, on June 10, 1993, records of radiation surveys conducted by the Health Physics Office could not be located and responsible personnel could not verify that the required surveys were conducted.

This is a Severity Level IV violation. (Supplement VI)

3. 10 CFR 19.11(a) and (b) require that current copies of Part 19, Part 20, the license, license conditions, documents incorporated into the license, license amendments and operating procedures be posted, or that a notice describing these documents and where they may be examined, be posted.

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Contrary to the above, on June 10, 1993, neither the documents nor the notices were posted.

This is a Severity Level V violation. (Supplement VI)

Pursuant to the provisions of 10 CFR 2.201, is hereby required to submit to this office within thirty days of the date of the letter which transmitted this Notice, a written statement or explanation in reply, including: (1) the corrective steps which have been taken and the results achieved; (2) corrective steps which will be taken to avoid further violations; and (3) the date when full compliance will be achieved. Where good cause is shown, consideration will be given to extending this response time.

## MATERIALS LICENSE

Amendment No. 02

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, 39, 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 letter dated December 7, 1992,	
1. Columbia University		3. License number SNM-1995 is amended in its entirety to read as follows:	
2. 289 Engineering Terrace 500 West 120th Street New York, New York 10027		4. Expiration date August 31, 1997	
		5. Docket or Reference No. 070-03074; 070-00882	
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. Uranium enriched in Uranium 235 isotope to less than 99.99% Uranium 235	A. Plated electrodes in two fission counters	A. 2.37 grams	
B. Uranium enriched in Uranium 235 isotope to less than 99.99% Uranium 235	B. Foils	B. 286 grams	
C. Plutonium 239	C. Sealed neutron sources	C. Not to exceed 80 grams per source and 363 grams total	
D. Plutonium 239	D. Plated detector sources	D. 0.81 grams	
E. Uranium 233	E. Liquid	E. 0.035 grams	
9. Authorized use			
A. For storage only.			
B. For storage only.			
C. For use in teaching and training of students; calibration of instruments.			
D. For storage only.			
E. For storage only.			

## CONDITIONS

10. Licensed material may be used only at licensee's facilities at Columbia University in the City of New York bounded by 114th Street and 120th Street between Broadway and Amsterdam Avenues, New York, New York; Barnard College bounded by 116th Street and 120th Street between Broadway and Riverside Drive, New York, New York; and Nevis Cyclotron Laboratory, Irvington, New York.
11. A. Licensed material shall be used by, or under the supervision of, individuals designated by the Radiation Safety Committee, David Brenner, Ph.D., Chairman.
- B. The Radiation Safety Officer for this license is Herbert P. Michael.

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MATERIALS LICENSE  
SUPPLEMENTARY SHEET

License number

SNM-1995

Docket or Reference number

070-03074

Amendment No. 02

(Continued)

## CONDITIONS

12. A. Sealed sources and detector cells shall be tested for leakage and/or contamination at intervals not to exceed 6 months or at such other intervals as are specified by the certificate of registration referred to in 10 CFR 32.210, not to exceed 3 years.
- B. Notwithstanding Paragraph A of this Condition, sealed sources designed to emit alpha particles shall be tested for leakage and/or contamination at intervals not to exceed 3 months.
- C. 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 or detector cell received from another person shall not be put into use until tested.
- D. Each sealed source fabricated by the licensee shall be inspected and tested for construction defects, leakage, and contamination prior to any use or transfer as a sealed source.
- E. Sealed sources and detector cells need not be leak tested if:
- (i) they contain only hydrogen 3; or
  - (ii) they contain only a gas; or
  - (iii) the half-life of the isotope is 30 days or less; or
  - (iv) they contain not more than 100 microcuries of beta and/or gamma emitting material or not more than 10 microcuries of alpha emitting material; or
  - (v) they are not designed to emit alpha particles, are in storage, and are not being used. However, when they are removed from storage for use or transfer to another person, and have not been tested within the required leak test interval, they shall be tested before use or transfer. No sealed source or detector cell shall be stored for a period of more than 10 years without being tested for leakage and/or contamination.
- F. The test shall be capable of detecting the presence of 0.005 microcurie of radioactive material on the test sample. Records of leak test results shall be kept in units of microcuries and shall be maintained for inspection by the Commission. If the test reveals the presence of 0.005 microcurie or more of removable contamination, a report shall be filed with the U.S. Nuclear Regulatory Commission and the source shall be removed from service and decontaminated, repaired, or disposed of in accordance with Commission regulations. The report shall be filed within 5 days of the date the leak test result is known with the U.S. Nuclear Regulatory Commission, Region I, ATTN: Chief, Nuclear Materials Safety Branch, 475 Allendale Road, King of Prussia, Pennsylvania 19406. The report shall specify the source involved, the test results, and corrective action taken.

MATERIALS LICENSE  
SUPPLEMENTARY SHEET

License number

SNM-1995

Docket or Reference number

070-03074

Amendment No. 02

(12. continued)

## CONDITIONS

- G. The licensee is authorized to collect leak test samples for analysis by the licensee. Alternatively, tests for leakage and/or contamination may be performed by persons specifically licensed by the Commission or an Agreement State to perform such services.
13. Sealed sources or detector cells containing licensed material shall not be opened or sources removed from source holders or detector cells by the licensee.
14. 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 5 years from the date of each inventory.
15. The licensee is exempted from the requirements of 10 CFR 70.24.
16. 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 November 6, 1991
- B. Letter dated June 30, 1992
- C. Letter dated August 21, 1992

Date

FEB 24 1993

For the U.S. Nuclear Regulatory Commission

Original Signed By

By Tara Weidner

Nuclear Materials Safety Branch  
Region I

King of Prussia, Pennsylvania 19406