October 22, 1984

DOCKET NO. 030-22042 CONTROL NO. 02921

EG&G Bogden Laboratories
ATTN: Dr. Arthur E. Bogden
Scientific Director
328 Shrewsbury Street
Worcester, MA 01604

Gentlemen:

This is in reference to your application, dated September 18, 1984, for a byproduct material license. In order to continue our review, we need the following additional information:

1. If Murray Bolton, the individual whose services you wish to use for survey meter calibration, has filed procedures with the NRC for operation of the calibration service for outside clients, it will be necessary for you to identify the NRC license number under which these procedures have been filed. Otherwise, it will be necessary for you to obtain the step-by-step calibration procedures.

These procedures should be in the form of a letter from this individual addressed to NRC. The procedures must be at least equivalent to those set forth in Appendix D, Section 1 (enclosed), and should include, as a minimum:

- a. The nuclide, activity and calibration accuracy of the sealed calibration source. Calibration accuracy should include traceability to a primary standard.
- b. The state or NRC license number that authorizes this individual to use the source.
- c. The step-by-step procedures. These procedures should include a two-point calibration on each scale with the points located at approximately 1/3 and 2/3 of full scale.
- d. The training and experience of this individual who will perform the calibrations.

- e. A copy of the documentation that this individual will provide to customers after calibrating the instrument.
- 2. Regarding your bioassay program for the use of I-131 & I-125, please specify your action points along with the corresponding actions you will implement after uptake. Item 5 of Regulatory Guide 8.20 (enclosed) contains the minimal criteria we find acceptable. You may adopt this program, or submit procedures that are at least equivalent to these.
- 3. Please submit your bioassay program for tritium. Refer to the enclosed guide for action levels and corresponding actions to be implemented concerning your particular program.
- 4. Though you have submitted numerous sketches of your facility, the areas for preparation, administering of dosages/tagging serum, and storage of byproduct material (and radioactive waste) have not been identified. Be sure to include in this description the locations of available fume hoods and their measured airflow rates across the face of the fully opened hood, as well as the measured airflow rates of exhaust and supply ventilation ducts in your preparation and animal habitat areas.
- 5. In regards to the use of radioactive material in animals, please submit answers to the following questions:
 - (a) A description of the animals' housing facilities.
 - (b) A copy of the instructions provided to animal caretakers for handling of animals, animal waste carcasses and cleaning and decontamination of animal cages.
- 6. You have identified only two individuals to use or supervise the use of licensed materials. Please confirm that these individuals will be available on a day-to-day basis to provide direct supervision of the use of radioactive materials. If additional laboratory personnel will provide supervision of use of materials, please identify these individuals and submit their training and experience.

We will continue our review of your application upon receipt of this information. Please reply in duplicate and refer to Control No. 02921.

Sincerely,

Original Signed By: John E. Glenn

John E. Clenn, Ph.D., Chief Nuclear Materials Section B Division of Engineering and Technical Programs

Enclosures:

- 1. Regulatory Guide 8.20
- 2. Applications of Bioassay for Tritium
- 3. Appendix D, Section 1 (Regulatory Guide 10.8)