

APPENDIX A

NRC FORM 313

(1-84)
10 CFR 30, 32, 33, 34,
35 and 40U.S. NUCLEAR REGULATORY COMMISSION
APPROVED BY OMB
3150-0120
Expires: 5-31-87

APPLICATION FOR MATERIAL LICENSE

INSTRUCTIONS: SEE THE APPROPRIATE LICENSE APPLICATION GUIDE FOR DETAILED INSTRUCTIONS FOR COMPLETING APPLICATION. SEND TWO COPIES OF THE ENTIRE COMPLETED APPLICATION TO THE NRC OFFICE SPECIFIED BELOW.

FEDERAL AGENCIES FILE APPLICATIONS WITH:

U.S. NUCLEAR REGULATORY COMMISSION
DIVISION OF FUEL CYCLE AND MATERIAL SAFETY, NMSS
WASHINGTON, DC 20555

ALL OTHER PERSONS FILE APPLICATIONS AS FOLLOWS, IF YOU ARE LOCATED IN:

CONNECTICUT, DELAWARE, DISTRICT OF COLUMBIA, MAINE, MARYLAND, MASSACHUSETTS, NEW JERSEY, NEW YORK, PENNSYLVANIA, RHODE ISLAND, OR VERMONT, SEND APPLICATIONS TO:

U.S. NUCLEAR REGULATORY COMMISSION, REGION I
NUCLEAR MATERIAL SECTION B
831 PARK AVENUE
KING OF PRUSSIA, PA 19406

ALABAMA, FLORIDA, GEORGIA, KENTUCKY, MISSISSIPPI, NORTH CAROLINA, PUERTO RICO, SOUTH CAROLINA, TENNESSEE, VIRGINIA, VIRGIN ISLANDS, OR WEST VIRGINIA, SEND APPLICATIONS TO:

U.S. NUCLEAR REGULATORY COMMISSION, REGION II
MATERIAL RADIATION PROTECTION SECTION
101 MARIETTA STREET, SUITE 2900
ATLANTA, GA 30323

IF YOU ARE LOCATED IN:

ILLINOIS, INDIANA, IOWA, MICHIGAN, MINNESOTA, MISSOURI, OHIO, OR WISCONSIN, SEND APPLICATIONS TO:

U.S. NUCLEAR REGULATORY COMMISSION, REGION III
MATERIALS LICENSING SECTION
799 ROOSEVELT ROAD
GLEN ELLYN, IL 60137

ARKANSAS, COLORADO, IDAHO, KANSAS, LOUISIANA, MONTANA, NEBRASKA, NEW MEXICO, NORTH DAKOTA, OKLAHOMA, SOUTH DAKOTA, TEXAS, UTAH, OR WYOMING, SEND APPLICATIONS TO:

U.S. NUCLEAR REGULATORY COMMISSION, REGION IV
MATERIAL RADIATION PROTECTION SECTION
611 RYAN PLAZA DRIVE, SUITE 1000
ARLINGTON, TX 76011

ALASKA, ARIZONA, CALIFORNIA, HAWAII, NEVADA, OREGON, WASHINGTON, AND U.S. TERRITORIES AND POSSESSIONS IN THE PACIFIC, SEND APPLICATIONS TO:

U.S. NUCLEAR REGULATORY COMMISSION, REGION V
MATERIAL RADIATION PROTECTION SECTION
1450 MARIA LANE, SUITE 210
WALNUT CREEK, CA 94596

RECEIVED

MAR 25 1985

U.S. N.R.C.
LIC. FEE MGMT. BRANCH

PERSONS LOCATED IN AGREEMENT STATES SEND APPLICATIONS TO THE U.S. NUCLEAR REGULATORY COMMISSION ONLY IF THEY WISH TO POSSESS AND USE LICENSED MATERIAL IN STATES SUBJECT TO U.S. NUCLEAR REGULATORY COMMISSION JURISDICTION.

1. THIS IS AN APPLICATION FOR (Check appropriate item):

☐ A. NEW LICENSE☐ B. AMENDMENT TO LICENSE NUMBER☒ C. RENEWAL OF LICENSE NUMBER 47-19370-01

2. NAME AND MAILING ADDRESS OF APPLICANT (Include Zip Code)

LCP CHEMICALS - WV, INC.
3 miles South on Route 2
P.O. Box "J"
Moundsville, WV 26041

3. ADDRESS(ES) WHERE LICENSED MATERIAL WILL BE USED OR POSSESSED.

SAME AS 2 ABOVE . . .

4. NAME OF PERSON TO BE CONTACTED ABOUT THIS APPLICATION

John F. Budinscak

TELEPHONE NUMBER

304-843-1310

SUBMIT ITEMS 5 THROUGH 11 ON 8 1/2 x 11" PAPER. THE TYPE AND SCOPE OF INFORMATION TO BE PROVIDED IS DESCRIBED IN THE LICENSE APPLICATION GUIDE.

5. RADIOACTIVE MATERIAL

a. Element and mass number, b. chemical and/or physical form, and c. maximum amount which will be possessed at any one time.

6. PURPOSE(S) FOR WHICH LICENSED MATERIAL WILL BE USED.

7. INDIVIDUAL(S) RESPONSIBLE FOR RADIATION SAFETY PROGRAM AND THEIR TRAINING AND EXPERIENCE.

8. TRAINING FOR INDIVIDUALS WORKING IN OR FREQUENTING RESTRICTED AREAS

9. FACILITIES AND EQUIPMENT.

10. RADIATION SAFETY PROGRAM.

11. WASTE MANAGEMENT.

12. LICENSEE FEES (See 10 CFR 170 and Section 170.31)

FEE CATEGORY AMOUNT
ENCLOSED \$ 120.00

13. CERTIFICATION. (Must be completed by applicant). THE APPLICANT UNDERSTANDS THAT ALL STATEMENTS AND REPRESENTATIONS MADE IN THIS APPLICATION ARE BINDING UPON THE APPLICANT.

THE APPLICANT AND ANY OFFICIAL EXECUTING THIS CERTIFICATION ON BEHALF OF THE APPLICANT, NAMED IN ITEM 2, CERTIFY THAT THIS APPLICATION IS PREPARED IN CONFORMITY WITH TITLE 10, CODE OF FEDERAL REGULATIONS, PARTS 30, 32, 33, 34, 35, AND 40 AND THAT ALL INFORMATION CONTAINED HEREIN IS TRUE AND CORRECT TO THE BEST OF THEIR KNOWLEDGE AND BELIEF.

WARNING: 18 U.S.C. SECTION 1001 ACT OF JUNE 25, 1948, 62 STAT. 749 MAKES IT A CRIMINAL OFFENSE TO MAKE A WILLFULLY FALSE STATEMENT OR REPRESENTATION TO ANY DEPARTMENT OR AGENCY OF THE UNITED STATES AS TO ANY MATTER WITHIN ITS JURISDICTION.

SIGNATURE—CERTIFYING OFFICER

John F. Budinscak

TYPED/PRINTED NAME

John F. Budinscak

TITLE Corporate Coordinator
Safety & Hygiene

DATE

3/20/85

14. VOLUNTARY ECONOMIC DATA

a. ANNUAL RECEIPTS

< \$250K	\$1M - 3.5M
\$250K - 500K	\$3.5M - 7M
\$500K - 750K	\$7M - 10M
\$750K - 1M	> \$10M

b. NUMBER OF EMPLOYEES (Total for entire facility excluding outside contractors)

c. NUMBER OF BEDS

d. WOULD YOU BE WILLING TO FURNISH COST INFORMATION (Dollar and/or staff hours) ON THE ECONOMIC IMPACT OF CURRENT NRC REGULATIONS OR ANY FUTURE PROPOSED NRC REGULATIONS THAT MAY AFFECT YOU? (NRC regulations permit it to protect confidential commercial or financial—proprietary—information furnished to the agency in confidence)

YES

NO

FOR NRC USE ONLY

TYPE OF FEE

Renewal

FEE LOG

March 3rd

FEE CATEGORY

3P

COMMENTS

APPROVED BY

Francis Brown

AMOUNT RECEIVED

120

CHECK NUMBER

6004456

DATE

3/28/85

PRIVACY ACT STATEMENT ON THE REVERSE

8505020011 850411
REG2 LIC30
47-19370-01 PDR

98
4/1/85
#50516
Rec'd 3/25/85

PRIVACY ACT STATEMENT

Pursuant to 5 U.S.C. 552a(e)(3), enacted into law by section 3 of the Privacy Act of 1974 (Public Law 93-579), the following statement is furnished to individuals who supply information to the Nuclear Regulatory Commission on NRC Form 313. This information is maintained in a system of records designated as NRC-3 and described at 40 Federal Register 45334 (October 1, 1975).

1. **AUTHORITY:** Sections 81 and 161(b) of the Atomic Energy Act of 1954, as amended (42 U.S.C. 2111 and 2201(b)).
2. **PRINCIPAL PURPOSE(S):** The information is evaluated by the NRC staff pursuant to the criteria set forth in 10 CFR Parts 30, 32, 33, 34, 35 and 40 to determine whether the application meets the requirements of the Atomic Energy Act of 1954, as amended, and the Commission's regulations, for the issuance of a radioactive material license or amendment thereof.
3. **ROUTINE USES:** The information may be (a) provided to State health departments for their information and use; and (b) provided to Federal, State, and local health officials and other persons in the event of incident or exposure, for their information, investigation, and protection of the public health and safety. The information may also be disclosed to appropriate Federal, State, and local agencies in the event that the information indicates a violation or potential violation of law and in the course of an administrative or judicial proceeding. In addition, this information may be transferred to an appropriate Federal, State, or local agency to the extent relevant and necessary for an NRC decision or to an appropriate Federal agency to the extent relevant and necessary for that agency's decision about you.
4. **WHETHER DISCLOSURE IS MANDATORY OR VOLUNTARY AND EFFECT ON INDIVIDUAL OF NOT PROVIDING INFORMATION:** Disclosure of the requested information is voluntary. If the requested information is not furnished, however, the application for radioactive material license, or amendment thereof will not be processed. A request that information be held from public inspection must be in accordance with the provisions of 10 CFR 2.790. Withholding from public inspection shall not affect the right, if any, of persons properly and directly concerned need to inspect the document.
5. **SYSTEM MANAGER(S) AND ADDRESS:** U.S. Nuclear Regulatory Commission
Director, Division of Fuel Cycle and Material Safety
Office of Nuclear Material Safety and Safeguards
Washington, D.C. 20555

ATTACHMENT TO:

APPLICATION FOR MATERIAL LICENSE

License Number 47-19370-01

LCP CHEMICALS - WV, INC.

5. RADIOACTIVE MATERIAL

- a. Element & mass number - NICKEL 63
- b. Chemical and/or physical form - Sealed Source
- c. Maximum amount which will be possessed at any one time - 2 sources 15 MC each
- d. Manufacturer & model number - Hewlett-Packard Detector 18803-60520
- e. Manufacturer & model number of foil source - Electron capture detector
Model series 5800
Hewlett-Packard Company

6. PURPOSE(s) FOR WHICH LICENSED MATERIAL WILL BE USED

For use in Hewlett-Packard Gas Chromatograph for sample analysis.

7. INDIVIDUAL(s) RESPONSIBLE FOR RADIATION SAFETY PROGRAM AND THEIR TRAINING AND EXPERIENCE

John F. Budinscak - Corporate Coordinator Safety & Hygiene
Received radiation recognition and control training at the
NIOSH Training Center, Cincinnati, OH.

LCP does not plan to perform any maintenance or repair on
the gas chromatography device.

8. TRAINING FOR INDIVIDUALS WORKING IN OR FREQUENTING RESTRICTED AREAS

Robert L. Conroy and William A. Lyden

9. FACILITIES AND EQUIPMENT

The room in which the device is located is only accessible to
persons authorized to use the device and is locked when an
authorized person is not physically present.

ATTACHMENT TO: Application for Material License

10. RADIATION SAFETY PROGRAM

Responsibility of John F. Budinscak

- Personnel Monitoring Equipment
Not required for radiation source Nickel 63
- Radiation Detection Instruments
Not required for radiation source Nickel 63
- Leak Test
A Nickel 63 electron capture detector leak (wipe) test kit (18713-60050) will be used every six months or more often if required. Attachment (National Leak Test Center, N. Tonawanda, NY).
- Maintenance and Repair
LCP does not plan to perform any maintenance or repair on the gas chromatography device.

11. WASTE MANAGEMENT

Radiation sources are sealed and were purchased for permanent use. If it is necessary to dispose of the radioactive source, the source will be returned to the manufacturer, Hewlett-Packard.

NATIONAL LEAK TEST CENTER

P.O. BOX 486
N. TONAWANDA, NY 14120
Phone 716-693-0550

February 12, 1985

Mr. Robert Conroy

LCP Chemicals - W.Va., Inc.
State Route #2
Moundsville, WA 26041

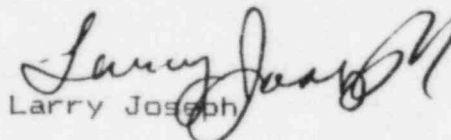
Dear Mr. Conroy:

I would like to advise you of an important service that we are making available to users of ECDs containing radioactive Nickel-63. The service relieves your scheduling of testing every six months, because you will be sent a kit to remind you that the test is due. The test materials are supplied absolutely FREE. The charge for analysis is only \$25.00 per kit. Delivery of the leak test certificate is 7 days after receipt of samples and purchase order or check.

We have worked closely with Hewlett Packard and Perkin Elmer on this new service. Enclosed are excerpts from Hewlett Packard service notes indicating that we are approved as a testing agency.

Please give us a try by filling out and returning the enclosed card.

Sincerely yours,


Larry Joseph

LJ/mm

** Over Twenty Years Experience in Leak Testing **

The Service Note contained in the kit gives detailed instructions for performing the wipe test on all HP electron capture detectors. The following description is modified slightly to apply directly to the HP 19282, HP 19312 and HP 19233 ECDs.

1. Select three information cards (Item 1) and fill out completely.
2. Select three pieces of filter paper (Item 2) and label them with a pencil as follows:

Sample 1-Det. Entrance Fitting
Sample 2-Det. Housing
Sample 3-Det. Exit

3. Disconnect the column from the ECD.
4. Wipe the inside and outside of the detector entrance fitting (including column and adapter connections) with the piece of filter paper labeled "Sample 1-Det. Entrance Fitting." Immediately insert it and a filled-out information card into one of the plastic bags (Item 3).
5. Wipe the detector housing (outside case) with the filter paper labeled "Sample 2-Det. Housing" and insert it and a filled-out information card into a second plastic bag.
6. Disconnect the exit tubing from the detector vent tube. Wipe the inside of the metal detector exit tube and/or the inside of the exit tubing with the filter paper labeled "Sample 3-Det. Exit." Insert it and a filled-out information card in a third plastic bag.

Inspect the tubing running from the detector vent tube to the fitting on the rear panel of the instrument (HP 5880 only). It should be intact and securely attached at both ends.

7. The "ECD Wipe Samples" must be analyzed by an NRC or Agreement State authorized company offering this service. Place the three plastic bags in one of the envelopes provided (company A or B listed below or one of your choice) and forward for testing. We suggest that you contact them for cost of testing and payment arrangements directly.

A. Nuclear Radiation Developments Inc.
2937 Alt Blvd.
Grand Island, NY 14072
Phone: 1-716-773-7634

B. National Leak Test Center
P.O. Box 486
N. Tonawanda, NY 14120
Phone: (716) 693-0550

8. You will be notified of the test results.

If the test indicates leakage of 0.005 microcurie or greater, you must take the detector out of service immediately and notify the NRC or appropriate state agency within five (5) days.

Records of tests must be kept for possible inspection.

INCIDENTS

Sections 20.403 and 31.5 (c)(5) of the NRC Regulations, reprinted in this book, describe the reporting action that must be taken if an incident occurs. An incident, in the sense of this section, is any occurrence involving radioactive material that has caused or may cause:

1. Exposure to dangerous levels of radiation.
2. Release of dangerous amounts of radioactive material.
3. Loss of working time due to radiation hazard.
4. Damage to property.

Two levels of reporting are described; immediate for severe incidents and 24-hour for incidents of less severity.

WARNING

IN THE ABSENCE OF RADIATION MEASURING EQUIPMENT, ALL INCIDENTS OR SIGNIFICANT FAILURES SHOULD BE REPORTED.

THE INSTRUMENT MUST BE TAKEN OUT OF SERVICE AT ONCE. DO NOT ATTEMPT TO USE IT FOR ANY OTHER PURPOSE, SUCH AS RUNNING ANALYSES WITH A DIFFERENT DETECTOR.

The first two classes (exposure and release) are defined in terms of radiation measurements. Since a General Licensee is not required to maintain a radiation measurement capability and may not have access to one when needed, the following criteria are offered to aid in recognizing possible incidents and other failures:

1. Failure to pass the leak (wipe) test. A notification of failure must be reported.
2. Temperature runaway. A failure in the temperature control circuits of the instrument, accompanied by failure of the overheat protection circuits, could cause heating of the detector above the $370 \pm 10^\circ\text{C}$ limit for the HP 5880/HP 5790 Gas Chromatograph or $400^\circ\text{C} \pm 10^\circ\text{C}$ for HP 5890 Gas Chromatograph. This must be reported.

3. Marking on Outside of Packaging

No marking required.

ICAO Part 2,
Chapter 7, P. 7.5,
sub-P. 7.5.1

Each instrument or article (except radioluminescent timepieces or devices)
is marked "Radioactive."

ICAO Part 2,
Chapter 7, P. 7.5,
sub-P. 7.5.3(d)

4. Label

No label required.

ICAO, Part 2,
Chapter 7, P. 7.5,
sub-P. 7.5.1

5. Shipper's Certification for Radioactive Material

Shipper's Declaration is *NOT* required.

ICAO, Part 2,
Chapter 7, P. 7.5,
sub-P. 7.5.1

IATA 24th Edition,
Section 5, P. 5.7,
sub-P. 5.7.28(e)

Cleaning the Detector

WARNING

THERMAL CLEANING IS THE ONLY PROCEDURE PERMITTED UNDER A GENERAL LICENSE. DO NOT INTRODUCE ANY LIQUID SOLVENT INTO THE DETECTOR CELL. THE SOLVENT FLUSH PROCEDURE DESCRIBED IN SOME EDITIONS OF VOLUME 4 OF THE HP 5880 MANUAL MAY NOT BE PERFORMED BY A GENERAL LICENSEE.

THE DETECTOR EFFLUENT MUST BE PROPERLY VENTED DURING THE THERMAL CLEANING PROCESS.

Remove any existing column between the injection port and the ECD. Install an empty (unpacked) glass column. Set the oven temperature to 250°C and the carrier flow to 20-30 ml/min. Raise the ECD temperature to 350°C to thermally clean for several (3-4) hours.

RADIOACTIVITY LEAK TESTS

The ECD detector must be tested for leakage of radioactive material at least every six months. Records of all tests and their results must be maintained for possible inspection by the NRC. More frequent tests may be conducted. Under severe usage conditions, radioactivity leak tests during every column change will provide maximum security.

The procedure used is called the wipe test. A wipe test kit (part number 18713-60050) is supplied with every new ECD. It contains

ITEM	DESCRIPTION	PART NUMBER	QTY
1	Information Card	18713-90040	12
2	Filter Paper #41	3152-0035	12
3	Plastic Bags 4" x 8"	9222-0308	12
4	Envelope (NRD)	05750-80036	4
5	Service Note 5700A-5	5950-3586	1
6	Envelopes (National Leak Test Center	05890-90920	4

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5	Service Note 5700A-5	5950-3586	1
6	Envelopes (National Leak Test Center	05890-90920	4

We recommend that disposable plastic or rubber gloves be worn when performing this test. If they are not used, wash your hands thoroughly when you are finished.