

ML:LB:WOM (GL 241)

MAR 24 1966

Monsanto Company
800 North Lindbergh Boulevard
St. Louis, Missouri 63166

Attention: Mr. L. C. Weger
Safety Manager

Gentlemen:

Enclosed is Byproduct Material License GL 241 issued in response to your application dated January 28, 1966.

In order for a customer to qualify as a general licensee, Monsanto Company, or other specifically licensed persons, must fulfill certain requirements contained in Section 31.5, 10 CFR 31. Unless this is done, you will be in noncompliance with federal regulations for transferring Americium 241 to unauthorized recipients. Generally licensed devices must be installed, tested, and serviced in customer's facilities by Monsanto Company or by other specifically licensed persons. This means that the general licensee or an unlicensed electrical contractor could not, for example, install the device or perform tests for leakage of Americium 241. The term "device" pertains only to the small detector head containing the Americium 241 foils, and does not include the total electrical installation. The services authorized in your license can be performed only by those persons who have participated in and successfully completed the Pyrotronics, Inc., radiation training course.

Section 32.52, 10 CFR 32, requires that you inform your generally licensed customers of their responsibilities as general licensees who possess Americium 241 devices, including the requirement to have the device leak tested at the specified intervals. This is reflected in Condition No. 17 of your license which requires that you furnish a copy of the general license (Section 31.5) and other pertinent sections of the regulations to each of your generally licensed customers.

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You will note that Condition No. 15 of your license requires that services be performed in accordance with procedures contained in your application which includes the Pyretronics, Inc., "Radiation Training Manual, B-166". This includes the requirement that all devices be under your control prior to installation.

You will also note that Condition No. 20 requires that all transfers of devices to general licensees under your license be reported to the Atomic Energy Commission. This is your responsibility. You may wish to submit the report directly to Pyretronics, Inc., for ultimate transfer to the Commission, but this would not affect your responsibility to ensure that the report has been filed with the Commission.

Please note that Condition No. 10 does not authorize the use of byproduct material in Agreement States. An Agreement State is a state which has entered into an agreement with the Commission to assume certain regulatory authority over radioactive materials, pursuant to Section 274 of the Atomic Energy Act. A copy of the AEC regulation, Part 150, in which the transfer of regulatory authority to Agreement States is defined, is enclosed. Section 31.5, 10 CFR 31, provides recognition by the AEC of Agreement State licenses of this type. Agreement States generally provide similar recognition of AEC licenses, but we suggest you contact the Agreement State directly concerning the degree of reciprocity as may be available to you.

With respect to obtaining a license for the use of byproduct material within an Agreement State, you should write directly to the state regulatory agency responsible for the regulation of radioactive materials. We have enclosed a list of states having agreements to date which includes the addresses of the responsible agencies to contact.

Very truly yours,

William G. Miller
Isotopes Branch
Division of Materials
Licensing

Enclosures:

1. License No. GL 241
2. 10 CFR 20, 30, 31, 32,
and 130
3. Agreement State List
4. Form AEC-313

cc: Isotopes Branch Standard Distribut
Compliance, Region III

OFFICE ▶	ML:IB				
SURNAME ▶	WOMiller:bjh				
DATE ▶	3-18-66				