State of Alabama

DEPARTMENT OF PUBLIC HEALTH

State Office Building
Montgomery, Alabama 36130

IRA L. MYERS, M.D.
STATE HEALTH OFFICER

February 22, 1983

RECEIVED
FEB 28 1983
Office of Radiation Control
Licensing Section

Mr. Donald A. Nussbaumer
Assistant Director for
State Agreements Program
Office of State Programs
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Dear Mr. Nussbaumer:

Thank you for your letter ofFebruary 9, 1983. It is most interesting and does deserve a response.

1. The suggested States regulations have, for 15 years recommended, the wording used in Alabama's regulations. Since many states have such a provision, we fail to understand why the U. S. NRC now requests us not to enforce our regulations. Further, if we fail to enforce this regulation then which regulation should we next fail to enforce?

2. The crux of the problem seems to be whether the explanation of Agreement State requirements as currently provided by 3M is adequate. We will accept an adequate description of Agreement State requirements as meeting 420-3-26-.02(20)(b)4., but the present form is not adequate We feel that the following changes are needed.

   A. In the opening paragraph of describing a General licensee a point should be made that several Agreement States require prompt registration by a responsible official.

   B. A similar comment should be made in (7).

For your convenience we have included a copy of the form used by 3M.

Again we recognize that the Washington NRC Staff does not view general licenses as a significant potential health problem. However, we have serious reservations regarding some devices being distributed under this general license particularly when the General Licensee is not told that he has radioactive materials and the only information stating that he does is buried inside several operating documents.

Sincerely,

Aubrey V. Godwin, Director
Bureau of Radiological Health
Environmental Health Administration

AVG:psc
cc: 3M - Agreement States

U.S. NUCLEAR REGULATORY COMMISSION REGULATIONS APPLICABLE TO GENERAL LICENSEES

You automatically become a GENERAL LICENSEE when you receive the 3M Brand Nuclear Static Eliminator. Applicable N.R.C. Regulations may be found on the back of this sheet. The use of this device in an Agreement State is regulated under requirements substantially the same as these. In general the regulations state:

(1) All labels must be maintained on the devices and you must comply with the instructions provided with the device.

(2) You cannot transfer the device(s) to another general licensee.

(3) In case a static eliminator has been subjected to fire or other catastrophe or has been lost or stolen, NOTIFY THE STATIC CONTROL SYSTEMS DEPARTMENT, 3M COMPANY, IMMEDIATELY BY TELEPHONE. THE NUMBER TO CALL (collect) IS 612/733-9420. Ask for the Regulatory Affairs Manager. You will be advised relative to reporting the incident to the proper authorities when required.

(4) You must retain records of the receipt of the device and its return to 3M at the end of the lease period. (A table to record pertinent data is printed in the static eliminator instruction sheet).

(5) Po-210 devices must be leak tested every thirteen (13) months. Return of the device(s) to 3M at the end of the 12 month lease period will take care of this obligation for you.

(6) MODIFICATION OF 3M NUCLEAR STATIC ELIMINATORS BY OPERATIONS SUCH AS CUTTING, DRILLING, BENDING, WELDING, BRAZING OR OTHER DESTRUCTIVE AND/OR ALTERING OPERATIONS IS IN VIOLATION OF FEDERAL LAW AND NOT ALLOWED UNDER ANY CIRCUMSTANCES.

(7) Under USNRC and State regulations your operations using nuclear static eliminators may be inspected for compliance with these regulations. State regulations may require registration of your devices.

Your local Static Analyst is ready to assist you with any questions you may have concerning compliance with the above regulations. Do not hesitate to call at any time.

If you do not have your local Static Analyst's number, call 612/733-9420 and leave your message. We will see that you are contacted.

EXEMPTIONS FROM LICENSING REQUIREMENTS
APPLICABLE TO GENERAL LICENSING

§ 31 Certain measuring gauging or indicating devices.

(a) A general license is hereby issued to commercial and industrial firms and research, educational and medical institutions, individuals in the conduct of their business, and Federal, State or local government agencies to acquire, receive, possess, use or transfer, in accordance with the provisions of paragraphs (b), (c), and (d) of this section, byproduct material contained in devices designed and manufactured for the purpose of measuring, gauging or controlling thickness, density, level, interface location, radiation leakage, or qualitative or quantitative chemical composition, or for producing light or an ionized atmosphere.

(b) The general license in paragraph (a) of this section applies only to byproduct material in a device which has been manufactured, tested, and labeled in accordance with the specifications contained in a specific license issued by the Commission pursuant to § 32.51 of this chapter or in accordance with the specifications contained in a specific license issued by an Agreement State which authorizes distribution of the devices to persons generally licensed by the Agreement State.

(c) Any person who acquires, receives, possesses, uses or transfers byproduct material in a device pursuant to the general license in paragraph (a) of this section:

(1) Shall assure that all labels affixed to the device at the time of receipt and bearing a statement prohibiting removal of the labels are maintained thereon and shall comply with all instructions and precautions provided by such labels;

(2) Shall assure that the device is tested for leakage of radioactive material and proper operation of the on-off mechanism and indicator, if any, at no longer than six-month intervals or at such other intervals as are specified in the label; however,

(i) devices containing only krypton need not be tested for leakage of radioactive material, and

(ii) devices containing only tritium or not more than 100 microcuries of other beta and/or gamma emitting material or 10 microcuries of alpha emitting material and devices held in storage in the original shipping container prior to initial installation need not be tested for any purpose.

(3) Shall assure that the tests required by paragraph (c)(2) of this section and other testing, installation, servicing, and removal from installation involving the radioactive materials, its shielding or containment, are performed:

(i) in accordance with the instructions provided by the labels; or

(ii) by a person holding a specific license from the Commission or an Agreement State to perform such activities.

(4) Shall maintain records showing compliance with the requirements of paragraph (c)(2) and (c)(3) of this section. The records shall show the results of tests. The records also shall show the dates of performance of, and the names of, persons performing testing, installation, servicing, and removal from installation concerning the radioactive material, its shielding or containment.

(5) Upon the occurrence of a failure of, or damage to, or any indication of a possible failure of, or damage to, the shielding of the radioactive material or the on-off mechanism or indicator, or upon the detection of 0.005 microcurie or more removable radioactive material, shall immediately suspend operation of the device until it has been repaired by the manufacturer or other person holding a specific license from the Commission or an Agreement State to repair such devices, or disposes of or transfers it to a person authorized by a specific license to receive the byproduct material contained in the device and within 30 days furnish to the Director of the appropriate Nuclear Regulatory Commission Regulatory Operations Regional Office listed in Appendix D of Part 20 of this chapter a report containing a brief description of the event and the remedial action taken.

(6) Shall not abandon the device containing byproduct material.

(7) Shall not export the device containing byproduct material except in accordance with part 110 of this chapter.

(8) Except as provided in paragraph (c)(9) of this section, shall transfer or dispose of the device containing byproduct material only by transfer to a specific licensee of the Commission or of an Agreement State whose specific license authorizes him to receive the device and within 30 days after transfer of a device to a specific licensee shall furnish to the Director of Licensing, U.S. Nuclear Regulatory Commission, Washington, D.C. 20545 a report containing identification of the device by manufacturer's name and model number and the name and address of the person receiving the device. No report is required if the device is transferred to the specific licensee in order to obtain a replacement device.

(9) Shall transfer the device to another general licensee only:

(i) where the device remains in use at a particular location. In such case the transferor shall give the transferee a copy of this section and any safety documents identified in the label of the device and within 30 days of the transfer report to the Director of Licensing, U.S. Nuclear Regulatory Commission, Washington, D.C. 20545 the manufacturer's name and model number of device transferred, the name and address of the transferee, and the name and position of an individual who may constitute a point of contact between the Commission and the transferee; or

(ii) where the device is held in storage in the original shipping container at its intended place of use prior to initial use by a general licensee.

(10) Shall comply with the provisions of §§ 20.402 and 20.403 of this chapter for reporting accidents involving the loss of licensed material, but shall be exempt from the other requirements of Parts 19, 20, and 21 of this chapter.

(d) The general license in paragraph (a) of this section does not authorize the manufacture or import of devices containing byproduct material.

§ 31.5 Terms and conditions of licenses.

(a) Each license issued pursuant to the regulations in this part and Part 31.36, and all rights thereunder, shall be subject to all the provisions of the Act, now or hereafter in effect, and to all rules, regulations and orders of the Commission.

(b) No license issued or granted pursuant to the regulations in this part and Part 31.36, nor any right under a license shall be assigned or otherwise transferred in any manner not provided for in the regulations in this part, through transfer of control of any licensee to any person, unless the Commission shall, after securing full information, find that the transfer is in accordance with the provisions of the Act and shall give its consent in writing.

(c) Each person licensed by the Commission pursuant to the regulations in this part and Part 31.36 shall confine his possession and use of the byproduct material to the locations and purposes authorized in the license. Except as otherwise provided in the license, a license issued pursuant to the regulations in this part and Part 31.36 of this chapter shall carry with it the right to receive, acquire, own, possess, and import byproduct material. Procedures for shipment and transport of byproduct material shall be in accordance with the provisions of Part 71 of this chapter.

(d) Each license issued pursuant to the regulations in this part and Part 31.36 shall be deemed to contain the provisions set forth in section 183 of the Act, whether or not those provisions are expressly set forth in the license.

(e) The Commission may incorporate in any license issued pursuant to the regulations in this part and Part 31.36, at the time of issuance or thereafter, by appropriate rule, regulation or order, such additional requirements and conditions with respect to the licensee's receipt, possession, use and transfer of byproduct material as it deems appropriate or necessary in order to:

(1) Promote the common defense and security;

(2) Protect health or to minimize danger to life or property;

(3) Protect restricted data;

(4) Require such reports and the keeping of such records, and to provide for such inspections of activities under the license as may be necessary or appropriate to effectuate the purposes of the Act and regulations thereunder.

[illegible]

(c) Except in cases of willfulness or those in which the public health, interest or safety requires otherwise, no license shall be modified, suspended or revoked unless, prior to the institution of proceedings therefor, facts or conduct which may warrant such action shall have been called to the attention of the licensee in writing and the licensee shall have been accorded an opportunity to demonstrate or achieve compliance with all lawful requirements.

§ 30.62 Right to cause the withholding or recall of byproduct material.

The Commission may cause the withholding or recall of byproduct material from any person who is not equipped to observe or fails to observe such safety standards to protect health as may be established by the Commission, or who uses such materials in violation of law or regulation of the Commission, or in a manner other than as disclosed in the application or statements on which the Commission

§ 30.63 Violations.

An injunction or other court order may be obtained prohibiting any violation of any provision of the Act or of any regulation or order issued thereunder. A court order may be obtained for the payment of a civil penalty imposed pursuant to section 234 of the Act for violation of section 53, 57, 62, 63, 81, 82, 101, 104, 107, or 109 of the Act or any rule, regulation or order issued thereunder, or any term, condition or limitation of any license issued thereunder, or for any violation for which a license may be revoked under section 186 of the Act. Any person who willfully violates any provision of the Act or any rule or order issued thereunder may be guilty of a crime and upon conviction, may be punished by fine, imprisonment, or both, as provided by law.

§ 30.403 Reports of theft or loss of licensed material.

Each licensee shall report by telephone and telegram to the Director of the appropriate Nuclear Regulatory Commission Regulatory Operations Regional Office listed in Appendix D of Part 20 of this chapter, any occurrence becomes known to the licensee, any loss or theft of licensed material in such quantities and under such circumstances that it appears to the licensee that a substantial hazard may result to persons in unrestricted areas.

§ 30.403 Notifications of incidents.

(a) Immediate notification. Each licensee shall immediately notify the Director of the appropriate Nuclear Regulatory Commission Regulatory Operations Regional Office shown in Appendix D of this part by telephone and telegram of any incident involving byproduct material possessed by him and which may have caused or threatens to cause:

(1) Exposure of the whole body of any individual to 25 rems or more of radiation, exposure of the whole body of any individual to 150 rems or more of radiation, or exposure of the skin of the whole body of any individual to 375 rems or more of radiation, or

(2) The release of radioactive material in concentrations which, if averaged over a period of 24 hours, would exceed 5,000 times the limits specified for such materials in Appendix B, Table II of Part 20 of this chapter.

(3) A loss of one working week or more of the operation of any facilities affected, or

(4) Damage to property in excess of $100,000.

(b) Twenty-four hour notification. Each licensee shall within 24 hours notify the Director of the appropriate Nuclear Regulatory Commission Regulatory Operations Regional Office listed in Appendix D of this part by telephone and telegram of any incident involving licensed material possessed by him and which may have caused or threatens to cause:

(1) Exposure of the whole body of any individual to 5 rems or more of radiation, exposure of the whole body of any individual to 25 rems or more of radiation, or exposure of the skin of the whole body of any individual to 30 rems or more of radiation, or exposure of the skin of the hands or forearms or feet or ankles of any individual to 75 rems or more of radiation, or

(2) The release of radioactive material in concentrations which, if averaged over a period of 24 hours, would exceed 500 times the limits specified for such materials in Appendix B, Table II of Part 20 of this chapter, or

(3) A loss of one working week or more of the operation of any facilities affected, or

(4) Damage to property in excess of $200.

(c) Any licensee who notifies the Commission pursuant to this section shall also furnish to the Director of the appropriate Regional Office a written report within 30 days after learning of the occurrence of any incident for which notification is required by this section. Such reports shall describe the extent of exposure of persons to radiation or to radioactive material, including estimates of individuals who have received exposure to radiation or to radioactive material.

APPENDIX D

UNITED STATES NUCLEAR REGULATORY COMMISSION
REGULATORY OPERATIONS OFFICES

REGION	ADDRESS	TELEPHONE
I	[illegible]	[illegible]
II	Region II, USNRC Office of Inspection and Enforcement, Suite 1217, 730 Peachtree St. NW, Atlanta, Georgia 30303	404 526 5503
III	Region III, USNRC Office of Inspection and Enforcement, 799 Roosevelt Road, Glen Ellyn, Illinois 60137	312 858 2660
IV	Region IV, USNRC Office of Inspection and Enforcement, 611 Ryan Plaza Drive, Suite 1000, Arlington, TX 76012	817 334 4211
V	Region V, USNRC Office of Inspection and Enforcement, 1990 N. California Blvd., Suite 202, Walnut Creek, CA 94596	415 486 3141

34-7005-96 49 .6A

LITHO IN

August 22, 1972

Mr. Chester L. Nayfield, M.D.
Administrator
Radiological & Occupational
Health Section
Department of Health &
Rehabilitation Services
State of Florida
P.O. Box 210
Jacksonville, Florida 32201

Dear Dr. Nayfield:

As a follow up to our telephone conversation of 11 August we are formally requesting an exception to Paragraph 170J-3.202 (3) (b) 8 of the Rules and Regulations for Control of Radiation Hazards for our customers in the State of Florida who are utilizing generally licensed nuclear static elimination equipment distributed by 3M Company pursuant to our AEC License 22-00057-32G. Specifically we request that the quarterly report which 3M Company has been submitting to you for several years be accepted in lieu of registration of the devices by the individual general licensees.

We do realize that the letter of the law as written requires individual registration. However, the spirit of the law can best be served by accepting the 3M quarterly report for the registration. The registration provision was included in the Rules and Regulations to insure that the licensing authority (in this case the Division of Health) have current knowledge of the location of each generally licensed device so that appropriate action could be taken in the case of an accident or incident. We agree with this philosophy but we do contend that the registration will be more complete and current if the 3M quarterly report is used. Relying on registration of these static eliminators by the general licensees is hit and miss at best, and it is a time consuming job for your staff.

Your Department is charged with protecting the health and safety of the residents of the State of Florida. 3M Company wishes to do all in its power to facilitate this undertaking as regards the use of our generally licensed static elimination equipment. We manufacture quality products. They are safe to use. But the products can be abused regardless of our instructions to the customer or yours. If a situation like this should come to your attention, we'd like to know. On the other hand in any case where a situation like this comes to our attention, we notify agencies such as yours. Together we can perform our functions better in this radiological safety area than either of our organizations can do alone.

The granting of our request is not without precedent in other Agreement States. All such states, except Florida, accept our quarterly report as the individual static eliminator registration In a state like New York this exception was granted formally (Cas No. 2388-66, State of New York Department of Labor, Board of Stan and Appeals). In most states the exception was granted without formal action.

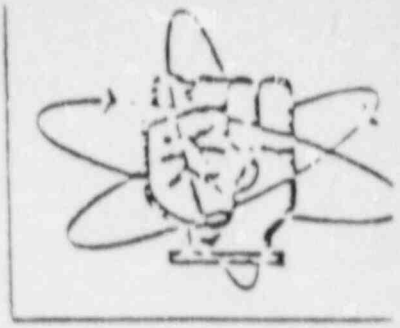
Naturally 3M Company has an ulterior motive in asking for this exception. We have built a business in the static eliminator area. If our customers in Florida feel that they are being "picked on" your department, our selling job will be more difficult or even impossible. While we are used to dealing with licensing agencies the general run of person is not. A simple request (from a government agency) to fill out a form and return it is harrassment, in estimation. The point is that it is a difficult job to maintain customer good will now, the competitive situation being what it is Registration problems would only add to the problem.

I hope that I have made our position clear and that our request is specific enough. I do appreciate your time in listening to our story. Please take up this matter with the "powers that be". I would appreciate learning of the decision as soon as possible. Pl contact me if there are any questions.

Very truly yours,

Robert J. Kunz
Sales Manager
Static Eliminators

Nuclear Products 3M COMPANY



3M BRAND STATIC ELIMINATOR

SPECIAL INSTRUCTIONS

This shipping box contains the following items:

1. The static eliminator(s) which you ordered.
2. A packing list.
3. A copy of the instruction sheet for the 3M Brand Static Eliminator.
4. An address label for returning your used device(s)

Please check to see that the static eliminator(s) is (are) phyrically intact. Any damage to the device(s) should be reported immediately to the 3M Company(Nuclear Products).

On page 3 of the instruction sheet you will find spaces to record the receipt and return of 3M Brand Static Eliminators. Please make the appropriate entries immediately and retain the instruction sheet in your files. Should you have a prior (year-old) form it is suggested that you replace it with the new one, insuring that all devices now on hand have been recorded.

Please package the used unit(s) in the shipping container immediately, affix the return label, and ship via U.P.S. or Air Express, Prepaid.

On the reverse side of this document is a copy of Department of Transportation Special Permit No. 5248, which authorizes the containers used to ship this static elimination equipment.

Thank you in advance for your cooperation.

DEPARTMENT OF TRANSPORTATION
HAZARDOUS MATERIALS REGULATIONS BOARD
WASHINGTON, D.C. 20590

SPECIAL PERMIT NO. 5248
THIRD REVISION
(COMPLETE)

This special permit is reissued pursuant to 49 CFR 170.15 of the Department of Transportation (DOT) Hazardous Materials Regulations, as amended and on the basis of the September 1, 1970, petition by the 3M Company, St. Paul, Minnesota, and the original petitions on file with this Board.

1. Shipments of radioactive materials, n.o.s., are hereby authorized in the packaging as described in this special permit, and as further provided for herein. This packaging, when constructed and assembled as prescribed herein, with the contents as authorized herein meets the standards prescribed in the DOT regulations, Section 173.395(a). This permit is issued only to extend the Type A package quantity limits for "special form" radioactive material to a specific form of a group I radionuclide, which does not meet all of the requirements of "special form" radioactive material.

2. Each shipper, under this permit, other than the petitioner named above shall register his identity with this Board prior to his first shipment, and shall have a copy of this permit in his possession before making any shipment.

3. The packaging authorized by this permit consists of any approved Type packaging as prescribed in SS173.389(j) and 173.395(a).

4. The contents of each package authorized by this permit consist of not more than 20 curies of radioactive material, n.o.s., in the form of polonium-210 as sources fabricated of 3M Brand Radiating Microspheres, and contained static elimination type, or similiar devices.

5. The outside of each package must be plainly and durably marked "DOT 5248", in connection with and in addition to the other markings and labels prescribed by the DOT regulations. Each shipping paper issued in connection with shipments made under this permit must bear the notation "DOT SPEC PERMIT NO. 5248", in connection with the commodity description thereon.

6. Each package must have its gross weight plainly and durably marked on the outside of the package.

7. This permit authorizes shipments only by passenger-carrying aircraft, cargo-only aircraft, motor vehicle, and rail. (For shipments by air, a copy of this permit must be carried aboard any aircraft transporting radioactive material under these terms.)

8. Any incident involving loss of contents of the package must be reported to this Board at the earliest feasible moment following the incident.

9. This permit does not relieve the shipper or carrier from compliance with any requirement of the DOT regulations, except as specifically provided for herein.

10. This permit expires November 30, 1972 and may be revoked for cause any time.

Nuclear Products 3M COMPANY
3M CENTER ST. PAUL, MINNESOTA 55101

3M BRAND NUCLEAR STATIC ELIMINATORS

Instruction Sheet

GENERAL

3M Brand Static Eliminators are the most efficient devices available for the elimination of static electricity. Since their ability to eliminate static charge comes from a nuclear material, polonium 210, they do not require electrical power. There are no special handling requirements for these devices. Because of the nature of the nuclear material (an alpha emitter) there is no external radiation hazard. The alpha particles emitted will not even penetrate a thin sheet of paper. Likewise, there is no internal hazard because the isotope is permanently "caged" in 3M Brand Radiating Microspheres.

The above information is not meant to imply that these devices are a cure all. Although they are designed to reduce the static charge to neligible levels, the actual level to which the static charge is reduced depends upon the individual application.

SPECIAL PRECAUTIONS

1. In case the static eliminators have been subjected to a fire or other catastrophe please proceed as follows immediately:

   a) Notify the Nuclear Products Department, 3M Company, preferably by telephone (collect). The phone number is 612/733 9420. Ask for the Sales Manager.

   b) Notify the U.S.A.E.C. Regional Compliance Office listed on the back page of this Instruction Sheet. The AEC will instruct you as to further action to be taken. The AEC is aware of the built-in safety features of our nuclear static eliminators.

2. Although these devices are designed to retain their integrity under normal industrial operating conditions, they could be damaged if subjected to extreme environmental conditions. Before using these devices in the following situations it is recommended that you contact the local Static Analyst or 3M Company Nuclear Products for an opinion on the propriety of such action.

   a) Ambient temperature in excess of 200°F.
   b) Strong cleaning solvents, such as ketones and hydrocarbons.
   c) Mineral acids or caustics.
   d) Constant vibration or physical impact.
   e) Flying abrasive matter.

3. See also Page 3 of this Instruction Sheet (AEC Regulations, paragraph 3).

INSTALLATION – STATIC BARS (210, 315)

The most effective working distance is approximately 1" from the working surface of the nuclear component of the device, and the device should be mounted above or below the material to be neutralized at this distance. Because of the wide range of application, mounting brackets are not provided, but mounting holes that take a ¼" bolt are placed at the ends of the housing.

Positioning of the device must be determined for each application. In most cases the device should be placed over the sheet or web at a point where removal of the static charge will eliminate the problem caused by the charge. This is generally determined by trial and error. In most instances a unit on one side of a sheet or web will remove the static charge from both surfaces. There are, however, some cases where this does not take place and a device must be used on each side.

These units are not fully effective when placed over a point where the charged sheet or web is in contact with another surface. Most effective neutralization of static electricity takes place when the material is suspended in free space.

These units must be grounded.

Should the determination of the magnitude of the static charge be desired, it is best accomplished by using a commercially available static meter (such as the 3M Model 703).

Special Note For Model 315: For proper operation of the "315" it is necessary that the induction component of the device be "upstream" from the nuclear component, that is, the charged material must pass the induction component prior to passing the nuclear component. There is an arrow on the label of this device indicating the proper direction of web movement.

CLEANING – STATIC BARS

Since the penetrating ability of the alpha particle is so slight, a coating of dust or dirt over the device will adversely affect its operation. To prevent this, it is suggested that whenever possible the unit should be mounted face down over the sheet or web to reduce the accumulation of dirt. Should the device become dirty it may be cleaned by wiping with a dry cloth or rag moistened with solvent (such as heptane). If it appears that more strenuous cleaning methods are required, we suggest that you contact 3M Company for instructions.

INSTALLATION – COMPRESSED AIR DEVICES (902, 906, 908)

These devices require no installation except connection to a source of compressed air. Because ionized air rapidly recombines, particularly under compressed conditions, the static eliminator must be placed at the end of the compressed air line so that the distance from the static eliminator to the object to be neutralized is minimal.

AIR SUPPLY – COMPRESSED AIR DEVICES

A coating of water or oil over the nuclear source will decrease the efficiency of the static eliminator. It is often wise to install an air filter prior to the static eliminator to prevent this problem by removing dust, water, or oil droplets from the air.

INSTALLATION – BLOWN AIR DEVICES (905, 907)

These devices require no installation other than the connection to a source of air (907), such as a pressure blower, or a 110 volt electrical outlet (905).

CLEANING - BLOWN AIR DEVICES

As with the other nuclear static eliminators caution should be exercised not to coat the nuclear surface with dust or other foreign material. Should the device become dirty it may be gently rinsed with distilled and immediately air dryed

AEC REGULATIONS

You automatically become a GENERAL LICENSEE when you receive the 3M Brand Static Eliminator. Applicable AEC Regulations may be found on the next page. Read them. Generally, here is what is required of you.

1. Do not transfer, abandon, or dispose of the device except to return it to 3M Company (Nuclear Products). This does not prohibit your moving the device from machine to machine, or building to building.
2. Do not remove the label from the device
3. If the device is damaged to the extent that the radiological integrity might be impaired, withdraw the device from service and immediately contact 3M Company (Nuclear Products).
4. The theft or loss of the device should be reported immediately to the 3M Company (Nuclear Products).
5. Record the serial number, the amount of polonium^{210}, and the appropriate dates in the table below, for reference.
6. Although not required by the AEC Regulations, the leasing arrangement under which these devices are distributed requires that the devices be returned to 3M Company at the end of each lease year.

SERIAL NO.	ACTIVE LENGTH (inches)	Po^{210} CONTENT (millicuries)	DATE RECEIVED	DATE RETURNED TO 3M COMPANY

Magnifying glass needed

ATOMIC ENERGY COMMISSION
GENERAL LICENSE PROVISIONS

EXCERPTS FROM 10CFR30, 10CFR31, & 10CFR32
APPLICABLE TO GENERAL LICENSING

[illegible]

CAUTION: RADIOACTIVE MATERIAL

[illegible]

RECORDS, INSPECTION AND TESTS

[illegible]

UNITED STATES ATOMIC ENERGY COMMISSION
COMPLIANCE OFFICES

REGION	ADDRESS	TELEPHONE: DAYTIME	TELEPHONE: [illegible]
I	Region I, Division of Compliance, USAEC [illegible]	[illegible]	[illegible]
II	Region II, Division of Compliance, USAEC [illegible]	[illegible]	[illegible]
III	Region III, Division of Compliance, USAEC [illegible]	[illegible]	[illegible]
IV	Region IV, Division of Compliance, USAEC [illegible]	[illegible]	[illegible]
V	Region V, Division of Compliance, USAEC [illegible]	[illegible]	[illegible]

A safe, efficient Nuclear Static Eliminator

DESIGNED TO SOLVE THESE KINDS OF PROFIT-ROBBING PROBLEMS

- Fires and Explosions
- Dust Accumulation
- Feeding Jams
- Improper Delivery
- Handling Problems
- Uneven Jogging
- Rejected Material
- Undesirable Surface Properties
- Operation of Equipment at Reduced Speeds
- Excess Waste
- Poor Quality
- Material Breakage

To name but a few!

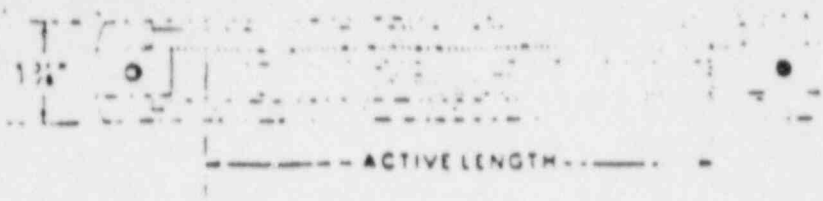
TYPICAL AREAS WHERE THE 210 HAS PROVEN USEFUL

Plastics	Rubber
Paper	Foam
Printing	Magnetic Tape
Packaging	Photographic
Textile	

And the list goes on!

Nuclear Products

3M CENTER • ST. PAUL, MINNESOTA 5510



SPECIFICATIONS:

Overall length — Active length +2¾"
Mounting Hole Centers — Active Length +1¾"
Mounting Holes — 9/32" Diameter
Temperature limit — 200°F Ambient
Isotope — Po-210
Emission — Alpha
Activity — 2 millicuries per inch
Thickness — ⅛"
Width — 1¾"

OUTSTANDING FEATURES OF THE 210

- Reduces both positive and negative static charges to near zero levels
- Completely portable — static problems can move around; the "210" can be moved right with them
- No operational expense — self-powered; uses no electricity
- Nothing to fail mechanically or electrically
- Compact — fits almost anywhere
- Simple to install — no wires; no fancy connections
- Completely safe — no hazard from the nuclear power source
- Can be used safely in volatile areas — no fire or explosion hazard
- Generally licensed by U.S. Atomic Energy Commission

LEASING SERVICE

The normal useful life of this device is one year. AEC regulations require that the device be leak tested each twelve months. To satisfy both requirements the device is leased on a renewable 12 month basis. At the end of each 12 month period a fresh device is shipped to the customer and the old device is returned to 3M Company.

Terms: 2/10, net 30
All prices F.O.B. St. Paul, Minn. and subject to change without notice.
All units are custom manufactured to order only after properly executed 3M Lease Agreements are received.
Delivery: Approximately 2 weeks after receipt of signed lease agreement.
Quantity discounts available upon request.