

VOID SHEET

TO: License Fee Management Branch

FROM: RIII - COLLEEN C. CASEY

SUBJECT: VOIDED APPLICATION

Control Number: 304348

Applicant: ON-SITE INSTRUMENTS INC.

License Number: 34-24437-01

Docket Number: 030-28575

Date Voided: 11/24/98

Reason for Void: Licensee needs additional time to respond to deficiencies discussed in telephone conversations today and previously. Will re-activate shortly via written response. Voided after review.

Colleen C. Casey Nov. 24/1998
Signature Date

Attachment:
Official Record Copy of
Voided Action

FOR LFMB USE ONLY

- ☐ Refund Authorized and processed
☒ No Refund Due
☐ Fee Exempt or Fee Not Required

Comments: _____

Log completed ☒
Processed by: SAC 12/2/98

9812040084 981124
PDR ADOCK 03028575
C PDR

040027

9/1
ML 30
JAW

BETWEEN:

(FOR LFMS USE)
INFORMATION FROM

License Fee Management Branch, ARM
and
Regional Licensing Sections

Program Code: 03240
Status Code: 0
Fee Category: 3P
Exp. Date: 20000731
Fee Comments:
Decom Fin Assur Req'd: N

LICENSE FEE TRANSMITTAL

A. REGION

1. APPLICATION ATTACHED

Applicant/Licensee: ON-SITE INSTRUMENTS INCORPORATED
Received Date: 980828
Docket No: 3028576
Control No: 304348
License No: 34-24437-01
Action Type: Amendment

2. FEE ATTACHED

Amount: 340
Check No: 03531

3. COMMENTS

Signed
Date

D. Hersey
9-3-98

B. LICENSE FEE MANAGEMENT BRANCH (Check when milestone 03 is entered ☒)

1. Fee Category and Amount: 3P \$340

2. Correct Fee Paid, Application may be processed for:

Amendment ☒
Renewal
License

3. OTHER

Signed
Date

SC 9/8/98

Log	Sept 4 III
Remitter	
Check No.	3531
Amount	\$340
Fee Category	3P
Type of Fee	AMB
Date Check Rec'd	9/8/98
Date Completed	9/8/98
By:	SC

1998 SEP -8 PM 5:03

ON-SITE INSTRUMENTS
404 ENTERPRISE DRIVE
LEWIS CENTER, OHIO 43035
614-646-3022

AM966 AMD 3P
Sept 4 III

FIFTH THIRD BANK
LEXINGTON, KENTUCKY
73-119-421

03531

PAY
TO THE
ORDER
OF

US Nuclear Regulatory Commission
Three hundred fifty dollars and no/100

DATE

8/26/98

AMOUNT

\$340.00

Jamie Beasley

VOID AFTER 90 DAYS

⑈00353⑈ ⑆042101190⑆ 82610274⑈

SECURITY FEATURES: MICRO PRINT TOP & BOTTOM BORDERS - COLORED PATTERN - ARTIFICIAL WATERMARK ON REVERSE SIDE - MISSING FEATURE INDICATES A COPY

~~304358~~
304348

APPLICATION FOR MATERIAL LICENSE

REDUCED BURDEN PER RESPONSE TO COMPLY WITH THE INFORMATION COLLECTION REQUEST: 8 HOUR. SUBMITTAL OF THE APPLICATION IS NECESSARY TO DETERMINE THAT THE APPLICANT IS QUALIFIED AND THAT ADEQUATE PROCEDURES EXIST TO PROTECT THE PUBLIC HEALTH AND SAFETY. FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE INFORMATION AND RECORDS MANAGEMENT BRANCH (T-4 P39), U.S. NUCLEAR REGULATORY COMMISSION, WASHINGTON, DC 20548-0001, AND TO THE PAPERWORK REDUCTION PROJECT (2180-0120), OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON, DC 20503.

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.

APPLICATION FOR DISTRIBUTION OF EXEMPT PRODUCTS FILE APPLICATIONS WITH:

DIVISION OF INDUSTRIAL AND MEDICAL NUCLEAR SAFETY
OFFICE OF NUCLEAR MATERIALS SAFETY AND SAFEGUARDS
U.S. NUCLEAR REGULATORY COMMISSION
WASHINGTON, DC 20548-0001

ALL OTHER PERSONS FILE APPLICATIONS AS FOLLOWS:

IF YOU ARE LOCATED IN:

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

LICENSING ASSISTANT SECTION
NUCLEAR MATERIALS SAFETY BRANCH
U.S. NUCLEAR REGULATORY COMMISSION, REGION I
475 ALLENDALE ROAD
KING OF PRUSSIA, PA 19406-1415

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

NUCLEAR MATERIALS LICENSING SECTION
U.S. NUCLEAR REGULATORY COMMISSION, REGION II
101 MARBETTA STREET, NW, SUITE 2900
ATLANTA, GA 30325-0100

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.

IF YOU ARE LOCATED IN:

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

MATERIALS LICENSING SECTION
U.S. NUCLEAR REGULATORY COMMISSION, REGION III
801 WARRSHVILLE RD.
LITTLE, IL 60332-4361

ALASKA, ARIZONA, ARKANSAS, CALIFORNIA, COLORADO, HAWAII, IDAHO, KANSAS, LOUISIANA, MONTANA, NEBRASKA, NEVADA, NEW MEXICO, NORTH DAKOTA, OKLAHOMA, OREGON, PACIFIC TRUST TERRITORIES, SOUTH DAKOTA, TEXAS, UTAH, WASHINGTON, OR WYOMING, SEND APPLICATIONS TO:

NUCLEAR MATERIALS LICENSING SECTION
U.S. NUCLEAR REGULATORY COMMISSION, REGION IV
811 RYAN PLAZA DRIVE, SUITE 400
ARLINGTON, TX 76011-8064

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

- ☐ A. NEW LICENSE
☒ B. AMENDMENT TO LICENSE NUMBER 34-24437-01
☐ C. RENEWAL OF LICENSE NUMBER _____

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

On-Site Instruments, Inc.
404 Enterprise Drive
Lewis Center, Ohio 43035

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

404 Enterprise Drive
Lewis Center, Ohio 43035

4. NAME OF PERSON TO BE CONTACTED ABOUT THIS

Larry R. Cheetham

TELEPHONE NUMBER

614.846.3022

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; c. 1. 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 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 <u>3P</u> AMOUNT ENCLOSED \$ <u>340.00</u>

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, 36, 38 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.

CERTIFYING OFFICER - TYPED/PRINTED NAME AND TITLE

Larry R. Cheetham President

SIGNATURE

[Signature]

DATE

8/26/98

FOR NRC USE ONLY

TYPE OF FEE	FEE LOG	FEE CATEGORY	AMOUNT RECEIVED	CHECK NUMBER	COMMENTS
			\$		
APPROVED BY				DATE	

pm 8/31/98

RECEIVED

SEP 01 1998

REGION III

SEP 01 1998

~~304358~~ 304348



August 31, 1998

Colleen Casey
UNITED STATES NUCLEAR REGULATORY COMMISSION
Region 3
801 Warrensville Road
Lisle, IL 60532-4351

Dear Colleen:

As we discussed in our recent telephone conversation, both David P. Cheetham and James Kotopka are no longer working for my company. I attended a radiation safety course in August 1998 and wish to be the company R.S.O.. A copy of my certificate is enclosed for your files. ON-SITE INSTRUMENTS, INC., requests that the NRC amends our materials license, 34-24437-01, as follows:

Item 1. This application is for:

Subitem B: Amendment to license number 34-24437-01.

Item 2. Name and Mailing Address of Applicant:

ON-SITE INSTRUMENTS, INC.
404 Enterprise Drive
Lewis Center, Ohio 43035

Item 3. Address where licensed material will be used or possessed:

404 Enterprise Drive
Lewis Center, Ohio 43035

A monthly inventory will be performed of cells in inventory at ON-SITE INSTRUMENTS, INC. (OSI). When an ECD cell is transferred from the manufacturer, OSI is responsible for the safe use and storage of the material until we have transferred the material back to the original owner or a licensed disposal facility. A quarterly report will be sent to the Nuclear Regulatory Commission's Director of Nuclear Material Safety and Safeguards, specifying the location of cells that have been rented, leased or sold, and are not at the 404 Enterprise location.

ON-SITE INSTRUMENTS

On-Site Instruments, Inc.
New Center, Ohio 43035
(614) 844-3022
1-800-766-7483
FAX (614) 844-3994

OSI shall be licensed to distribute ECD cells to our rental customers who shall be required, at a minimum, to be generally licensed pursuant to 10 CFR §31.5, prior to transfer of the ECD Cells. Prior to any transfer, the purchaser or rental customer shall submit proof of either a general or specific license. Rental customers who receive the ECD cells installed in gas chromatographs from OSI shall be governed by the transfer restrictions described in 10 CFR §30.41. Customers renting, leasing to purchase or purchasing ECD's will receive the Hewlett-Packard's publication: "Information for General Licensees" (#43-5953-1798), which contains 10 CFR §§ 20.402, 20.403, 30.34, 30.51-30.53, 30.61-30.63, 31.5, and 49 CFR §§ 173.42-173.423; instructions of theory, use maintenance, radioactivity leak tests, and procedures for incident reporting. Customers leasing or purchasing gas chromatographs with ECD detectors must affirm, in writing, that they will abide with regulations listed in 10 CFR §§ 20.402, 20.403, 30.51, 30.61-30.63, 31.5 and 49 CFR §§ 173.421-173.423, and provide a copy of their license to OSI prior to the transfer from OSI. Customers will also receive the following notice:

ON-SITE INSTRUMENTS, INC. Electron Capture Detector Information Sheet

Enclosed is Hewlett-Packard's Publication: "Information for General Licensees" (#43-5953-1798). The information in it is summarized below, however, the US Nuclear Regulatory Commission (NRC) requires you to be familiar with the information in it.

Electron Capture Detectors (ECD) we distribute contain a ^{63}Ni radioactive source, which is electroplated onto the inner surface of the detector cell body. ^{63}Ni has a half life of 101.1 years, and a maximum activity of 15 mCi; 65.87 KeV emission of β radiation.

The NRC license of On-Site Instruments, Inc., provides that you must have an existing General License or Specific License prior to renting, leasing or purchasing from OSI and must provide proof of such license prior to transfer and shipment from OSI. It is your responsibility, if necessary, to register with the regulatory agency of the state where the ECD is used, if that state is an "Agreement State".

You may not:

- 1.) Open the detector cell.
- 2.) Modify the cell in any manner.
- 3.) Use any solvent, including water, to clean the cell.
- 4.) Interfere with or attempt to defeat the overheat circuitry supplied with the detector.
- 5.) Remove or deface the identification tag attached to the cell.

ON-SITE INSTRUMENTS

10000 Highway 10, Suite 100
Columbus, Ohio 43035
(614) 846-3022
1-800-766-7483
FAX (614) 844-3994

You are required to:

- 1.) Perform a radioactivity leak test every six months. OSI will pay for the analysis of the wipe samples, if you are renting or leasing the cell from OSI, when the wipe test is required.
- 2.) Be able to report to OSI, at any time, the location of each ECD.
- 3.) Maintain records as required by the NRC.
- 4.) Notify the NRC and OSI in case of any incidents or failure which might lead to a hazardous condition.

Item 4. Name of person to be contacted about this application:

Larry R. Cheetham, telephone number (614-846-3022), Fax (614-844-3990)

Item 5. Radioactive materials:

a.) Elements and mass numbers

Nickel-63 (^{63}Ni)

b.) Chemical and physical forms:

Assembled detectors containing plated source in enclosed, sealed cell (Electron Capture Detector Cells; Hewlett-Packard model Numbers 19233 or G1223A and Varian model number 02-001972-00). Most cells will be Hewlett-Packard models.

c.) Maximum amount to be possessed at one time:

No single cell or standard is to exceed 15 millicuries each. The total activity of all cells is to be less than 5 curie or approximately 330 cells. Hewlett-Packard and Varian have assume responsibility for cell decommissioning.

Item 6. Purposes for which licensed material will be used:

To be used in Hewlett-Packard and Varian gas chromatographs which will be rented, leased and sold throughout the United States for sample analysis. These systems containing electron capture detectors will be governed by Hewlett-Packard's and Varian's general licenses or by specific licenses. OSI will also perform sample analysis at it's location, or may temporarily transport the detector cells to do analysis at a customer's location.

ON-SITE INSTRUMENTS

404 Enterprise Drive
Lewis Center, Ohio 43035
(614) 846-3022
1-800-766-7483
FAX (614) 844-3994

Item 7. Individuals responsible for maintaining radiation safety program, and their training and experience:

RADIATION SAFETY OFFICER

Larry R. Cheetham
ON-SITE INSTRUMENTS, INC.
404 Enterprise Drive
Lewis Center, Ohio 43035

Professional Experience

- *Supervised SMI Mobile Lab at DOE Portsmouth Uranium Enrichment Plant (RCRA Facility Investigation 1991-1994)
- *Supervised SMI mobile lab at Wright Patterson AFB (1/93 to 6/93)
- * Extensive experience with laboratory and direct reading instruments.

Training

- * DOE Radiation Protection Training at DOE Portsmouth Uranium Enrichment Plant (January 1991-1994)
- * 40 hour OSHA Training (29 CFR 1910.120) August 1987
- * 8 hour OSHA Supervisor Training
- * 40 hour OSHA Training Instructor
- * 40 hour Radiation Safety Officer Training (CSI Radiation Safety Training, August 98)

Education

Capital University, Bexley, Ohio
Bachelor of Science, Biology, 1979

AUTHORIZED MATERIALS USER

Mitchell G. Baker
On-Site instruments
404 Enterprise Drive
Lewis Center, Ohio 43035

Professional Experience

- *Operated SMI Mobile Lab at DOE Portsmouth Uranium Enrichment Plant (RCRA Facility Investigation 1991-1994)
- *Operated SMI mobile lab at Wright Patterson AFB (1/93 to 6/93)
- * Extensive experience with laboratory and direct reading instruments.
- * Previously employed at SEA Environmental and Chemical Laboratory and qualified in EPA methodology; SW-846, 8240 (BTEX), PCB's, TPH gas chromatography (FID and ECD).

ON-SITE INSTRUMENTS

404 Enterprise Drive
Lewis Center, Ohio 43035
(614) 844-3022
1-800-766-7483
FAX (614) 844-3994

Training

- * DOE Radiation Protection Training at DOE Portsmouth Uranium Enrichment Plant (January 1991-1994)
- * 40 hour OSHA Training (29 CFR 1910.120) August 1987
- * 8 hour OSHA Refresher Training
- * Over 1 day OSI radiation training, including wipe test procedures.
- * Hewlett-Packard gas chromatography training (including ECD).

Education

Wright State University, Dayton, Ohio
Bachelor of Science, Environmental Health, 1992

AUTHORIZED MATERIALS USER

Carlo Recinella
On-Site instruments
404 Enterprise Drive
Lewis Center, Ohio 43035

Professional Experience

- * Manages OSI's instrument service department last 2 years
- * Extensive experience with laboratory and direct reading instruments.

Training

- * Over 1 day OSI radiation training, including wipe testing procedures.
- * OSI radiation meter operation and calibration training.

Education

Ohio State University, Columbus, Ohio
Bachelor of Science, Biology, 1993

Item 8. Training for individuals authorized to work with electron capture detectors:

In addition to supervision by the radiation safety officer, a one day training course will be provided by Larry R. Cheetham to instruct authorized users working with electron capture detectors on proper storage, transfer or use of radioactive materials. Authorized users shall be instructed in the basic principals and fundamentals of radiation safety and proper safety practices related to OSI's use of radioactive materials. This instruction shall include the purpose for which radiation detection devices will be used, a review of OSI's operating, safety and emergency procedures, specific instructions in precautions and procedures to minimize exposure to radiation and radioactive materials (ALARA), health protection problems associated with exposure to radioactive materials, proper techniques for determining the amount of radioactivity, wipe test procedures, proper shipping and receiving procedures, and decontamination techniques and procedures. Authorized users must complete this

ON-SITE INSTRUMENTS

404 Enterprise Drive
Lewis Center, Ohio 43035
(614) 846-3022
1-800-766-7483
FAX (614) 844-3994

training course prior to working with electron capture detectors. Attendance and completion of the course shall be documented.

Item 9. Facilities and equipment:

The use, storage and maintenance of radioactive materials shall remain in restricted areas at 404 Enterprise Drive, Lewis Center, OH 43035. All restricted areas shall be posted using conventional radiation caution colors (magenta or purple on yellow background) as provided in Section 20.203 (a) (1), of 10 CFR Part 20. In addition, all detector cells and cell baths, containing licensed material and used in gas chromatography devices shall be labeled with conspicuously etched or stamped radiation caution symbols without a color requirement. During normal operations, exhaust from detectors cells containing licensed material shall be vented through a laboratory fume hood or other suitable means designed to reduce potential exposure to personnel to the lowest possible level.

All repairs and maintenance to electron capture detectors shall be performed exclusively by Larry R. Cheetham, the radiation safety officer. All repairs and maintenance to electron capture detectors shall be limited and restricted to an area designated as a radiation area. The radiation area shall be locked at all times to prevent unauthorized access. The radiation area shall be posted, "Caution Radiation Area", using conventional radiation caution colors (magenta or purple on yellow background) as provided in Section 20.203 (a) (1), of 10 CFR Part 20. All repairs and maintenance to detector cells incident to cleaning and repair of detector cells shall be conducted within a Lucite H.E.P.A. filtered laboratory hood of sufficient thickness to provide effective radiation shielding to personnel. The hood shall contain a designated "hot sink" for final disposal of diluted radioactive materials and be posted using conventional radiation caution colors (magenta or purple on yellow background) as provided in Section 20.203 (a) (1), of 10 CFR Part 20. All cell baths or vessels containing licensed material shall be labeled using conventional radiation caution colors (magenta or purple on yellow background) as provided in Section 20.203 (a) (1), of 10 CFR Part 20. Radiation monitoring shall be required in the radiation area as provided in 10 CFR 20.1501 and 10 CFR 20.1502.

Item 10. Radiation Safety Program:

Restricted Areas:

Personnel Monitoring Equipment: Except as required by 10 CFR 20.1501 and 10 CFR 20.1502, personnel monitoring equipment will not be required for OSI employees working in the areas designated as "restricted areas" since the Ni-63 radiation source is a sealed source. OSI restricted areas require mandatory personnel protective equipment including, but not limited to, safety glasses, lab coats and hand protection. All personnel who do not work with electron capture detectors but are

ON-SITE INSTRUMENTS

404 Enterprise Drive
Lewis Center, Ohio 43035
(614) 846-3022
1-800-766-7483
FAX (614) 844-3994

assigned to a restricted area must attend OSI's basic radiation training course.

Radiation Areas:

Personnel monitoring equipment will be required for OSI employees working in the areas designated as "radiation area" as provided in 10 CFR 20.1501 and 10 CFR 20.1502. Radiation areas require mandatory personnel protective equipment including, but not limited to, safety glasses, lab coats and hand protection. Surveys shall be performed as required in 10 CFR 20.1501 and 10 CFR 20.1502.

Item 11. Waste Management: Waste management will be conducted in accordance with 10 CFR Sections 20.2001, through 20.2007.

Item 12. Changes in current materials license:

1. Item 2. Address of licensee should read:
404 Enterprise Drive
Lewis Center, Ohio 43035
2. Section 9-A. Authorized use: For possession incident to cleaning and repair of detector cells. For use as a gas chromatography detector. For redistribution of detector cells to individuals specifically licensed and to individuals generally licensed pursuant to 10 CFR 31.5, in accordance with 10 CFR 32.51.
3. Section 10. Licensed material shall be used at the licensee's facilities located at 404 Enterprise Drive, Lewis Center, Ohio 43035, or in temporary mobile laboratory facilities under the supervision of Larry R. Cheetham or use by Mitchell Baker or Carlo Recinella.
4. Section 11. Licensed material shall be used by, or under the supervision of, Larry R. Cheetham, Mitchell Baker or Carlo Recinella.
5. Section 19-B. Section 19-B should be deleted in its entirety.

Item 13. Licensee Fee:

Fee Category: 3P \$340.00 for Amendment to License #34-24437-01.
Check #3531 dated 8/26/98 enclosed for \$340.00.

On-Site Instruments, Inc.



Larry R. Cheetham
President

Certificate of Training

This Certifies That

Larry R. Cheetham

has successfully completed the 40-hour course of instruction for

Radiation Safety Officer

August 10-14, 1998

Presented By

CSI-Radiation Safety Training

3827 Farragut Avenue
Kensington, Maryland 20895

in association with

Radiation Service Organization, Inc.
Post Office Box 1526
Laurel, Maryland 20725

Ray Johnson

Raymond Johnson, C.H.P., P.E.
Training Director



DATE:

9/2/98

CORRESPONDENCE CLARIFICATION SHEET

REVIEWER:

MONTE PHILLIPS/SANDY FRAZIER

LICENSEE:

On-Site Instruments, Inc.

LICENSE NUMBER:

34-24437-01

The following correspondence has been received from the above licensee and it is not clear what action(s) is(are) required: Please review this correspondence and indicate which of the following applies, and please return to Debbie Hersey, or Ryan Te, as soon as possible.

☐ Additional Information to Control No. _____.
Process in as a new action, additional information, and no fee required.

☐ Process as new licensing action. Review has already been started on Control No. _____ and this information cannot be combined with current in-house action.

☐ Can be combined with Control No. _____. Review has not started.

☐ Appears to be information for the license file - file it.

☐ Licensee is adding Nuclear Pharmacists.

☐ Amendment is necessary _____. Amendment is not necessary _____.
(Information for license file)

☐ Licensee is adding authorized users.

☐ A check is included _____. No check is included _____.
Amendment is necessary ☒. Amendment is not necessary _____.
(This is a Notification)

☒ Process in as a new licensing action:

A. Amendment ☒

B. Renewal _____

C. New License Application _____

Other: Changing RSO

Thank You For Your Help!!!

01/28/98

OK

to Colleen!!



August 23, 1998

Colleen Casey
UNITED STATES NUCLEAR REGULATORY COMMISSION
Region 3
801 Warrensville Road
Lisle, IL 60532-4351

Dear Colleen:

Please be advised that David P. Cheetham, the designated RSO on our Material License, number 34-24437-01, is no longer with our organization. I am requesting the David be removed from our license at this time. My name is also listed on the current license and I am currently the acting RSO. I have attached a training certificate for your review. If there are any other requirements for or amendments to our license please contact me at your earliest convenience. I can be reached at 614-846-3022.

Very truly yours,

On-SITE INSTRUMENTS, INC.

Larry R. Cheetham
President

RECEIVED

AUG 28 1998

REGION III

AUG 28 1998

204348
Nationwide Service
www.on-siteinstruments.com

PM: 8/25/98

Certificate of Training

This Certifies That

Larry R. Cheetham

has successfully completed the 40-hour course of instruction for

Radiation Safety Officer

August 10-14, 1998

Presented By

CSI-Radiation Safety Training

3827 Farragut Avenue
Kensington, Maryland 20895

in association with

Radiation Service Organization, Inc.
Post Office Box 1526
Laurel, Maryland 20725

Ray Johnson

Raymond Johnson, C.H.P., P.E.
Training Director



FAX TRANSMITTAL

of pages 15

To: LARRY CHEETAM
 Dept./Agency: OSI
 Fax #: 614-846-3990
 NSN 7540-01-317-7368 5099-101

From: COLLEEN CASEY
 Phone #: 630-829-9841
 Fax #: 630-515-1259 or 1078
 GENERAL SERVICES ADMINISTRATION

TELEPHONE CONVERSATION RECORD

TIME: VARIOUS

DATE: 8/23, 8/26, 10/20, 11/24/98

☒ TELEPHONE☒ INCOMING☒ OUTGOING

ROUTING

NAME/SYMBOL

INT

NAME OF PERSON(S) CONTACTED OR IN CONTACT WITH YOU

Larry Cheetam

ORGANIZATION (office, dept., bureau, etc.)
Onsite Instruments, Inc.

TELEPHONE NO.

614-846-3022

SUBJECT

C/N 304348, Lic. No. 34-24437-01

SUMMARY

Application dtd 8/26/98, ltr dtd 8/31/98, ltr dtd 8/23/98

We need additional information and clarification as follows:

1. Larry Cheetam's name does not appear on the license yet. The last renewal was returned to David Cheetam and the license expiration extended per rulemaking in 1995-1996.
 2. See attached sheets, note pen + ink changes, questions marked. It appears that you have requested licensure for OSI that will cover proposed activities for another company you own, SMI. Please correct/delete/clarify/explain as appropriate.
 3. It appears that your license is incomplete with respect to safety procedures for cleaning + repairing ECD cells. See guidance excerpts and notations attached.
 4. Please delete all references to activities for SMI, as appropriate.
- A copy of NUREG 1536, Vol. 7, Draft is being sent to you.
 - OK to VOID until response submitted - done.

Please call Colleen C. Casey to discuss further: 800-522-3025 or 630-829-9841.

Address written response to my attention and mail to USNRC-Region III, 801 Wauernville Road, Lisle, IL 60532-4351. Reference Control No. 304348!

Please respond in 15-30 days or sooner to resolve compliance issues via licensure. Thanks.

SIGNATURE

Colleen C. Casey

TITLE

License Reviewer

DATE

Nov. 24/1998

CONVERSATION RECORD

*Sorry, I will
send another copy of 1556 Vol. 7
draft NUREG to you. Colleen*

Gas Chromatography Devices and X-ray Fluorescence Analyzer Applications

This appendix is designed either to assist the applicant with obtaining a separate license for a gas chromatograph (GC) and/or an x-ray fluorescence analyzer (XRF) or to be used as part of a license application that may contain other requested radioisotopes and proposed uses.

Regulations

Licensees are subject to all applicable provisions of the regulations in 10 CFR Parts 20, 21, 30, 71, 170 as they pertain to GC and XRFs.

Information for completing Items 1 through 4 of the application have already been provided in this NUREG.

Additional information for Item 3 is requested below.

Item 3: Address(es) Where Licensed Material Will Be Used or Possessed

OK Specify the street address, city, and state or other descriptive address (e.g., on Highway 10, 5 miles east of the intersection of Highway 10 and State Route 234, Anytown, State) for each facility at which licensed material will be used or stored. A Post Office Box address is not acceptable. In addition, state whether GC/XRFs will be used at temporary jobsites.

Item 5: Material to Be Possessed

- 1 Provide the radioisotopes(s) that will be used in each GC/XRF.
- 2 Provide the manufacturer and model number of the detector cell, foil source, plated source, or sealed source that will be used in each GC/XRF.
- OK* 3. Specify the quantity (activity) of radioactive material that will be in each foil source, plated source, or other sealed source. Provide the number of sources of each foil source, plated source or sealed source that will be possessed, if known. If the total number for each type of source is unknown, provide an anticipated total.

Note: GCs that contain titanium tritide foils or scandium tritide foils require operating temperature control mechanisms and venting to the outside. Provide information on operating temperature controls and venting information with the application, if these kinds of foils are requested in the application. See license condition no. 15 of the sample GC at the end of this appendix.

APPENDIX D

Item 6: Purpose For Which Licensed Material Will Be Used

Specify the purpose for which each GC/XRF will be used.

Clarify and withdraw previous statements pertaining to work SMI would do.

Item 7: Individual(s) Responsible For Radiation Safety Program And Their Training And Experience - Radiation Safety Officer

Provide the name of the person(s) who will be responsible for the GCs/ XRFs. That person(s) will be specifically named on the license.

If no repair or maintenance on the GC/XRFs is proposed by the applicant, then no specific training and experience in the use and handling of radioactive materials is necessary for individuals who will use the device(s) or supervise its use. No special training or experience is needed to perform leak tests using a leak-test kit or to clean detector cells used in GC devices, provided the source or foil is not removed from the detector cell.

BUT If the applicant proposes to perform any operations that involve removal of sources containing radioactive material from the device or maintenance and repair of a device that involves the source, only a "responsible individual" may perform these operations. The responsible individual shall have received instruction and training in the principles and practices of radiation safety, the use of radiation detection instruments, and the performance of these operations. Such training may normally be accomplished in 1 or 2 days. In the application, provide the following information.

- The specific operations and procedures that will be performed - *Need*
- The name of each responsible individual who will perform the operations - *OK*
- An outline of the instruction and training each responsible individual has received in the principles and practices of radiation safety, the use of radiation detection instruments, and the operations that will be performed, including actual practice in performing the operations. The amount of time spent on each topic in the training should be specified. *Need*
- The name and affiliation of the individual who will provide the training and his or her qualifications to conduct the training. *Need*

Item 8: Training Provided to Other Users

Persons who will only use a GC or XRF under the supervision of the responsible individual named in Item 7 need no special training, and their names do not need to be submitted. These individuals shall not be permitted to perform any maintenance or repair operations. Only responsible individuals specifically named in Item 7 shall perform such operations.

Clarify Mark Baker and Carlo Piccinella's roles as authorized users - will they actually work for OSI or only for SMI (when you get new license)?

Need **Item 9: Facilities And Equipment** *Please address all i*

10 CFR 30.33(a)(2) states that an application will be approved if the applicant's proposed equipment and facilities are adequate to protect health and to minimize danger to life or property. 10 CFR 20.1801 and 20.1802 also state that licensed material stored in an unrestricted area must be secured from unauthorized removal, and licensed materials in an unrestricted area and not in storage must be under the constant surveillance and immediate control of the licensee.

The room, laboratory, or storage area in which the device is located should be (1) accessible only to persons authorized to use the device and (2) locked when an authorized person is not physically present. The application should state that the laboratory or area will be locked or secured when an authorized person is not present. The room, laboratory, or storage area cannot be considered a restricted area if it is accessible to unauthorized persons.

Item 10: Radiation Safety Program**10.1 Audit Program** *Need*

Licensees must review the content and implementation of their radiation protection programs annually, to ensure compliance with NRC regulations and with the terms and conditions of the license. Appendix J contains a suggested audit program that is acceptable to NRC. All areas indicated in Appendix J may not be applicable to every licensee and may not need to be addressed during each audit.

10.2 Radiation Detection Instruments

Need A survey meter for routine uses of GC/XRF is not required.

BT: If maintenance and repair operations are proposed and described in Item 7, and the operations involve the sealed source, provide information about what surveys will be performed, what type of survey meter will be used for conducting surveys, the range of the survey instrument, and calibration information including frequency of calibration. It is not necessary to specify the manufacturer and model number of the survey meter. For more information on survey meters, see "Radiation Safety Program - Instruments," in the main body of this NUREG.

10.3 Material Receipt and Accountability *Need*

Licensees are required to maintain records of receipt, transfer, and disposal of licensed material. Loss, theft, or misplacement of licensed material can occur; therefore, control and accountability of GC/XRFs must be ensured. Licensees who use and/or possess sealed sources are required by license conditions to perform inventories of sealed sources every six months (see sample license, condition no. 15). Some sealed sources may not be in use or are rarely used and are placed in

APPENDIX D

storage. In these cases, licensees should confirm that these sealed sources have not been disturbed at least every 6 months.

10.4 Personnel Monitoring Equipment

Personnel monitoring devices are not required for the following:

- Routine use and normal operation of GC/XRFs
- Maintenance and repair operations described in Item 7, if the radiation source in the GC/XRF is in a gaseous form or is nickel-63 (Ni-63).

Do not need for Ni-63 only

If proposed uses of GC/XRFs include the maintenance and repair operations described in Item 7, and these operations involve sealed sources other than in gaseous form or Ni-63, an evaluation for personnel monitoring devices is required for persons performing these operations.

The application should indicate that maintenance and/or repair personnel will be provided with either film badges or Thermoluminescence dosimeters (TLD) for use while performing service operations or provide a dose evaluation which indicates that personnel will not be required to wear monitoring devices.

10.5 Leak-Testing

Please clarify your intended leak tests for OSI only

NRC requires testing to determine whether there is any radioactive leakage from sealed/plated foil sources. Records of surveys and leak tests results must be maintained.

When issued, a license will require performance of leak tests of sealed/plated foil sources at intervals as approved by NRC or an Agreement State and specified by the SSD Registration Certificate. The measurement of the leak-test sample is a quantitative analysis requiring that instrumentation used to analyze the sample be capable of detecting 185 Bq (0.005 mCi) of radioactivity.

Manufacturers, consultants, and other organizations may be authorized by NRC or an Agreement State either to perform the entire leak test sequence for other licensees or to provide leak test kits to licensees. In the latter case, the licensee is expected to take the leak test sample according to the sealed source or plated foil manufacturer's (distributor's) and the kit supplier's instructions and return it to the kit supplier for evaluation and reporting results. Leak test samples should be collected at the most accessible area where contamination would accumulate if the sealed source were leaking. Licensees may also be authorized to conduct the entire leak test sequence themselves. For more information about leak testing sealed/plated foil sources, see "Radiation Safety Program - Surveys," in the main body of this NUREG.

10.6 Maintenance and Repair

Need: Read this carefully we are not requesting proprietary information.

If authorization has been requested to perform the maintenance and repair operations described in Item 7, state in the application that the written procedures provided by the device manufacturer will be followed for each such operation requested. If a procedure will be followed other than that provided by the device manufacturer, submit a proposed procedure to use for each operation requested.

10.7 Transportation

Need

If authorization has been requested in the application to use GC/XRFs at a temporary jobsite, the applicant must take into consideration DOT regulations, particularly blocking and bracing the device containing licensed material. The applicant is not required to submit transportation information with the application.

10.8 Minimization of contamination

Wipe test surveys after cleaning & repairing ECBCells must be performed. 10 CFR 20.1501

New license applicants are required by 10 CFR 20.1406 to describe how facility design and procedures for operation will minimize, to the extent practicable, contamination of the facility and the environment, facilitate eventual decommissioning, and minimize, to the extent practicable, the generation of radioactive waste.

? Spills or ruptured sources? Emergency procedures?

Item 11: Waste Management

Need specifics:

If other radioactive waste generated, you will have to ship for burial or proper alternate disposal method.

Because of the nature of the licensed material contained in GC/XRF devices, the usual disposal option is to transfer the licensed material to an authorized recipient. State in the application that disposal will be by transfer of the radioactive material to a licensee specifically authorized to possess it, or provide information for an alternate method of disposal for NRC review.

Authorized recipients are the original supplier of the device, a commercial firm licensed by NRC or an Agreement State to accept radioactive waste from other persons, or another specific licensee authorized to possess the licensed material. No one else is authorized to receive licensed material.

D.1 ITEM 1: ACTION TYPE

ACTION TYPE:	ADMINISTRATIVE REVIEW:
<input type="checkbox"/> New	<input type="checkbox"/> Current Guidance Used
<input type="checkbox"/> Amendment	<input type="checkbox"/> References in Application Based On Current Regulations
<input type="checkbox"/> Renewal	<input type="checkbox"/> All Attachments Referenced Included
	<input type="checkbox"/> Signature on Application

APPLICATION FOR MATERIAL LICENSE

ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THE INFORMATION COLLECTION REQUEST: 8 HOURS. SUBMITTAL OF THE APPLICATION IS NECESSARY TO DETERMINE THAT THE APPLICANT IS QUALIFIED AND THAT ADEQUATE PROCEDURES EXIST TO PROTECT THE PUBLIC HEALTH AND SAFETY. FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE INFORMATION AND RECORDS MANAGEMENT BRANCH (T-6 P33), U.S. NUCLEAR REGULATORY COMMISSION, WASHINGTON, DC 20545-0001, AND TO THE PAPERWORK REDUCTION PROJECT (180-0120), OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON, DC 20503.

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.

APPLICATION FOR DISTRIBUTION OF EXEMPT PRODUCTS FILE APPLICATIONS WITH:

DIVISION OF INDUSTRIAL AND MEDICAL NUCLEAR SAFETY
OFFICE OF NUCLEAR MATERIALS SAFETY AND SAFEGUARDS
U.S. NUCLEAR REGULATORY COMMISSION
WASHINGTON, DC 20545-0001

ALL OTHER PERSONS FILE APPLICATIONS AS FOLLOWS:

IF YOU ARE LOCATED IN:

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

LICENSING ASSISTANT SECTION
NUCLEAR MATERIALS SAFETY BRANCH
U.S. NUCLEAR REGULATORY COMMISSION, REGION I
475 ALLENDALE ROAD
KING OF PRUSSIA, PA 19406-1415

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

NUCLEAR MATERIALS LICENSING SECTION
U.S. NUCLEAR REGULATORY COMMISSION, REGION II
101 MARBETTA STREET, NW, SUITE 2900
ATLANTA, GA 30323-0199

IF YOU ARE LOCATED IN:

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

MATERIALS LICENSING SECTION
U.S. NUCLEAR REGULATORY COMMISSION, REGION III
801 WARRENVILLE RD.
LIBLE, IL 60532-4361

ALASKA, ARIZONA, ARKANSAS, CALIFORNIA, COLORADO, HAWAII, IDAHO, KANSAS, LOUISIANA, MONTANA, NEBRASKA, NEVADA, NEW MEXICO, NORTH DAKOTA, OKLAHOMA, OREGON, PACIFIC TRUST TERRITORIES, SOUTH DAKOTA, TEXAS, UTAH, WASHINGTON, OR WYOMING, SEND APPLICATIONS TO:

NUCLEAR MATERIALS LICENSING SECTION
U.S. NUCLEAR REGULATORY COMMISSION, REGION IV
811 RYAN PLAZA DRIVE, SUITE 400
Arlington, TX 76011-8094

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 JURISDICTIONS.

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

- ☐ A. NEW LICENSE
☒ B. AMENDMENT TO LICENSE NUMBER 34-24437-01
☐ C. RENEWAL OF LICENSE NUMBER _____

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

On-Site Instruments, Inc.
404 Enterprise Drive
Lewis Center, Ohio 43035

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

404 Enterprise Drive
Lewis Center, Ohio 43035

4. NAME OF PERSON TO BE CONTACTED ABOUT THIS

Larry R. Cheetham

TELEPHONE NUMBER

614.846.3022

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 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 <u>3P</u> AMOUNT ENCLOSED \$ <u>340.00</u>	
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, 36, 38 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.			

CERTIFYING OFFICER - TYPED/PRINTED NAME AND TITLE

Larry R. Cheetham President

SIGNATURE

[Signature]

DATE

8/26/98

FOR NRC USE ONLY

TYPE OF FEE	FEE LOG	FEE CATEGORY	AMOUNT RECEIVED	CHECK NUMBER	COMMENTS
			\$		
APPROVED BY				DATE	

RECEIVED
SEP 01 1998
pm 8/31/98



August 31, 1998

Colleen Casey
UNITED STATES NUCLEAR REGULATORY COMMISSION
Region 3
801 Warrensville Road
Lisle, IL 60532-4351

Dear Colleen:

As we discussed in our recent telephone conversation, both David P. Cheetham and James Kotopka are no longer working for my company. I attended a radiation safety course in August 1998 and wish to be the company R.S.O.. A copy of my certificate is enclosed for your files. ON-SITE INSTRUMENTS, INC., requests that the NRC amends our materials license, 34-24437-01, as follows:

Item 1. This application is for:

Subitem B: Amendment to license number 34-24437-01.

Item 2. Name and Mailing Address of Applicant:

ON-SITE INSTRUMENTS, INC.
404 Enterprise Drive
Lewis Center, Ohio 43035

Item 3. Address where licensed material will be used or possessed:

404 Enterprise Drive
Lewis Center, Ohio 43035

A monthly inventory will be performed of cells in inventory at ON-SITE INSTRUMENTS, INC. (OSI). When an ECD cell is transferred from the manufacturer, OSI is responsible for the safe use and storage of the material until we have transferred the material back to the original owner or a licensed disposal facility. A quarterly report will be sent to the Nuclear Regulatory Commission's Director of Nuclear Material Safety and Safeguards, specifying the location of cells that have been rented, leased or sold, and are not at the 404 Enterprise location.



*Delete all references to activities that
SMI will be licensed for throughout*

Update to new 10CFR 20 Sections throughout

*SMI?
only
GL has
no prior
license!*

OSI shall be licensed to distribute ECD cells to our rental customers who shall be required, at a minimum, to be generally licensed pursuant to 10 CFR §31.5, prior to transfer of the ECD Cells. Prior to any transfer, the purchaser or rental customer shall submit proof of either a general or specific license. Rental customers who receive the ECD cells installed in gas chromatographs from OSI shall be governed by the transfer restrictions described in 10 CFR §30.41. Customers renting, leasing to purchase or purchasing ECD's will receive the Hewlett-Packard's publication: "Information for General Licensees" (#43-5953-1798), which contains 10 CFR §20.402, 20.403, 30.34, 30.51-30.53, 30.61-30.63, 31.5, and 49 CFR §§ 173.42-173.423; instructions of theory, use maintenance, radioactivity leak tests, and procedures for incident reporting. Customers leasing or purchasing gas chromatographs with ECD detectors must affirm, in writing, that they will abide with regulations listed in 10 CFR §§ 20.402, 20.403, 30.51, 30.61-30.63, 31.5 and 49 CFR §§ 173.421-173.423, and provide a copy of their license to OSI prior to the transfer from OSI. Customers will also receive the following notice:

*What if?
not H-P?*

ON-SITE INSTRUMENTS, INC.

Electron Capture Detector Information Sheet

Varian?

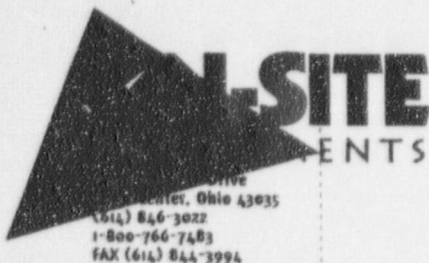
Enclosed is Hewlett-Packard's Publication: "Information for General Licensees" (#43-5953-1798). The information in it is summarized below, however, the US Nuclear Regulatory Commission (NRC) requires you to be familiar with the information in it.

Electron Capture Detectors (ECD) we distribute contain a ^{63}Ni radioactive source, which is electroplated onto the inner surface of the detector cell body. ^{63}Ni has a half life of 101.1 years, and a maximum activity of 15 mCi; 65.87 KeV emission of β radiation.

*no!
illogical* The NRC license of On-Site Instruments, Inc., provides that you must have an existing General License or Specific License prior to renting, leasing or purchasing from OSI and must provide proof of such license prior to transfer and shipment from OSI. It is your responsibility, if necessary, to register with the regulatory agency of the state where the ECD is used, if that state is an "Agreement State". *SMI?*

You may not:

- 1.) Open the detector cell.
- 2.) Modify the cell in any manner.
- 3.) Use any solvent, including water, to clean the cell.
- 4.) Interfere with or attempt to defeat the overheat circuitry supplied with the detector.
- 5.) Remove or deface the identification tag attached to the cell.



You are required to:

- 1.) Perform a radioactivity leak test every six months. OSI will pay for the analysis of the wipe samples, if you are renting or leasing the cell from OSI, when the wipe test is required.
- 2.) Be able to report to OSI, at any time, the location of each ECD.
- 3.) Maintain records as required by the NRC.
- 4.) Notify the NRC and OSI in case of any incidents or failure which might lead to a hazardous condition.

Item 4. Name of person to be contacted about this application:

Larry R. Cheetham, telephone number (614-846-3022), Fax (614-844-3990)

Item 5. Radioactive materials:

- a.) Elements and mass numbers

Nickel-63 (^{63}Ni)

- b.) Chemical and physical forms:

Assembled detectors containing plated source in enclosed, sealed cell (Electron Capture Detector Cells; Hewlett-Packard model Numbers 19233 or G1223A and Varian model number 02-001972-00). Most cells will be Hewlett-Packard models.

- c.) Maximum amount to be possessed at one time:

No single cell or standard is to exceed 15 millicuries each. The total activity of all cells is to be less than 5 curie or approximately 330 cells.

[Handwritten signature] Hewlett-Packard and Varian have assume responsibility for cell decommissioning. *Clarify, explain or delete.*

Item 6. Purposes for which licensed material will be used:

To be used in Hewlett-Packard and Varian gas chromatographs which will be rented, leased and sold throughout the United States for sample analysis. These systems containing electron capture detectors will be governed by Hewlett-Packard's and Varian's general licenses or by specific licenses. OSI will also perform sample analysis at it's location, or may temporarily transport the detector cells to do analysis at a customer's location.



Item 7. Individuals responsible for maintaining radiation safety program, and their training and experience:

RADIATION SAFETY OFFICER

Larry R. Cheetham
ON-SITE INSTRUMENTS, INC.
404 Enterprise Drive
Lewis Center, Ohio 43035

Professional Experience

- *Supervised SMI Mobile Lab at DOE Portsmouth Uranium Enrichment Plant (RCRA Facility Investigation 1991-1994)
- *Supervised SMI mobile lab at Wright Patterson AFB (1/93 to 6/93)
- * Extensive experience with laboratory and direct reading instruments.

Training

- * DOE Radiation Protection Training at DOE Portsmouth Uranium Enrichment Plant (January 1991-1994)
- * 40 hour OSHA Training (29 CFR 1910.120) August 1987
- * 8 hour OSHA Supervisor Training
- * 40 hour OSHA Training Instructor
- * 40 hour Radiation Safety Officer Training (CSI Radiation Safety Training, August 98)

Education

Capital University, Bexley, Ohio
Bachelor of Science, Biology, 1979

AUTHORIZED MATERIALS USER - SMI or OSI or both?

Mitchell G. Baker
On-Site instruments
404 Enterprise Drive
Lewis Center, Ohio 43035

only matters now.

Professional Experience

- *Operated SMI Mobile Lab at DOE Portsmouth Uranium Enrichment Plant (RCRA Facility Investigation 1991-1994)
- *Operated SMI mobile lab at Wright Patterson AFB (1/93 to 6/93)
- * Extensive experience with laboratory and direct reading instruments.
- * Previously employed at SEA Environmental and Chemical Laboratory and qualified in EPA methodology; SW-846, 8240 (BTX), PCB's, TPH gas chromatography (FID and ECD).



Training

- * DOE Radiation Protection Training at DOE Portsmouth Uranium Enrichment Plant (January 1991-1994)
- * 40 hour OSHA Training (29 CFR 1910.120) August 1987
- * 8 hour OSHA Refresher Training
- * Over 1 day OSI radiation training, including wipe test procedures.
- * Hewlett-Packard gas chromatography training (including ECD).

Education

Wright State University, Dayton, Ohio
Bachelor of Science, Environmental Health, 1992

AUTHORIZED MATERIALS USER

Carlo Recinella
On-Site instruments
404 Enterprise Drive
Lewis Center, Ohio 43035

*SMI or OSI or both?
only matters now.*

Professional Experience

- * Manages OSI's instrument service department last 2 years
- * Extensive experience with laboratory and direct reading instruments.

Training

- * Over 1 day OSI radiation training, including wipe testing procedures.
- * OSI radiation meter operation and calibration training.

Education

Ohio State University, Columbus, Ohio
Bachelor of Science, Biology, 1993

item 8. Training for individuals authorized to work with electron capture detectors:

In addition to supervision by the radiation safety officer, a one day training course will be provided by Larry R. Cheetham to instruct authorized users working with electron capture detectors on proper storage, transfer or use of radioactive materials. Authorized users shall be instructed in the basic principals and fundamentals of radiation safety and proper safety practices related to OSI's use of radioactive materials. This instruction shall include the purpose for which radiation detection devices will be used, a review of OSI's operating, safety and emergency procedures, specific instructions in precautions and procedures to minimize exposure to radiation and radioactive materials (ALARA), health protection problems associated with exposure to radioactive materials, proper techniques for determining the amount of radioactivity, wipe test procedures, proper shipping and receiving procedures, and decontamination techniques and procedures. Authorized users must complete this



training course prior to working with electron capture detectors. Attendance and completion of the course shall be documented.

Item 9. Facilities and equipment:

The use, storage and maintenance of radioactive materials shall remain in restricted areas at 404 Enterprise Drive, Lewis Center, OH 43035. All restricted areas shall be posted using conventional radiation caution colors (magenta or purple on yellow background) as provided in Section 20.203 (a) (1), of 10 CFR Part 20. In addition, all detector cells and cell baths, containing licensed material and used in gas chromatography devices shall be labeled with conspicuously etched or stamped radiation caution symbols without a color requirement. During normal operations, exhaust from detectors cells containing licensed material shall be vented through a laboratory fume hood or other suitable means designed to reduce potential exposure to personnel to the lowest possible level.

All repairs and maintenance to electron capture detectors shall be performed exclusively by Larry R. Cheetham, the radiation safety officer. All repairs and maintenance to electron capture detectors shall be limited and restricted to an area designated as a radiation area. The radiation area shall be locked at all times to prevent unauthorized access. The radiation area shall be posted, "Caution Radiation Area", using conventional radiation caution colors (magenta or purple on yellow background) as provided in Section 20.203 (a) (1), of 10 CFR Part 20. All repairs and maintenance to detector cells incident to cleaning and repair of detector cells shall be conducted within a Lucite H.E.P.A. filtered laboratory hood of sufficient thickness to provide effective radiation shielding to personnel. The hood shall contain a designated "hot sink" for final disposal of diluted radioactive materials and be posted using conventional radiation caution colors (magenta or purple on yellow background) as provided in Section 20.203 (a) (1), of 10 CFR Part 20. All cell baths or vessels containing licensed material shall be labeled using conventional radiation caution colors (magenta or purple on yellow background) as provided in Section 20.203 (a) (1), of 10 CFR Part 20. Radiation monitoring shall be required in the radiation area as provided in 10 CFR 20.1501 and 10 CFR 20.1502.

Item 10. Radiation Safety Program:

Restricted Areas:

Personnel Monitoring Equipment: Except as required by 10 CFR 20.1501 and 10 CFR 20.1502, personnel monitoring equipment will not be required for OSI employees working in the areas designated as "restricted areas" since the Ni-63 radiation source is a sealed source. OSI restricted areas require mandatory personnel protective equipment including, but not limited to, safety glasses, lab coats and hand protection. All personnel who do not work with electron capture detectors but are

→ Add no eating, drinking, smoking, storage of food + drink in areas where cleaning + repairs take place.



assigned to a restricted area must attend OSI's basic radiation training course.

Radiation Areas:

Personnel monitoring equipment will be required for OSI employees working in the areas designated as "radiation area" as provided in 10 CFR 20.1501 and 10 CFR 20.1502. Radiation areas require mandatory personnel protective equipment including, but not limited to, safety glasses, lab coats and hand protection. Surveys shall be performed as required in 10 CFR 20.1501 and 10 CFR 20.1502.

Item 11. Waste Management: Waste management will be conducted in accordance with 10 CFR Sections 20.2001, through 20.2007.

specific details needed

Item 12. Changes in current materials license:

1. Item 2. Address of licensee should read:

404 Enterprise Drive
Lewis Center, Ohio 43035

needed? if SMI only, for OSI delete.

2. Section 9-A. Authorized use: For possession, incident to cleaning and repair of detector cells. For use as a gas chromatography detector. For redistribution of detector cells to individuals specifically licensed and to individuals generally licensed pursuant to 10 CFR 31.5, in accordance with 10 CFR 32.51.

3. Section 10. Licensed material shall be used at the licensee's facilities located at 404 Enterprise Drive, Lewis Center, Ohio 43035, for in temporary mobile laboratory facilities under the supervision of Larry R. Cheetham or use by Mitchell Baker or Carlo Recinella. *FSMI? If so, delete.*

- Needed for OSI* 4. Section 11. Licensed material shall be used by, or under the supervision of, Larry R. Cheetham, Mitchell Baker or Carlo Recinella.

5. Section 19-B. ~~Section 19-B should be deleted in its entirety.~~

delete, we cannot do at this point. - Next renewal.

Item 13. Licensee Fee:

Fee Category: 3P \$340.00 for Amendment to License #34-24437-01.
Check #3531 dated 8/26/98 enclosed for \$340.00.

On-Site Instruments, Inc.

Larry R. Cheetham
President

Certificate of Training

This Certifies That

Larry R. Cheetham

has successfully completed the 40-hour course of instruction for

Radiation Safety Officer

August 10-14, 1998

Presented By

CSI-Radiation Safety Training

3827 Farragut Avenue
Kensington, Maryland 20895

in association with

Radiation Service Organization, Inc.
Post Office Box 1526
Laurel, Maryland 20725

Ray Johnson

Raymond Johnson, C.H.P., P.E.
Training Director





UNITED STATES
NUCLEAR REGULATORY COMMISSION

REGION III
801 WARRENVILLE ROAD
LISLE, ILLINOIS 60532-4351

September 3, 1998

Larry R. Cheetham, RSO
On-Site Instruments Incorporated
404 Enterprise Drive
Lewis Center, OH 43035

SUBJECT: ACKNOWLEDGEMENT OF CORRESPONDENCE
(Letter Dated August 23, 1998)

Dear Licensee:

In response to your request, we have completed the initial processing, which is an administrative review of your application for a(n):

☐ New License ☒ Amendment ☐ Renewal
☐ Termination ☐ Auth User (Amendment not required)
☐ Other _____

No administrative deficiencies were identified during this initial review. However, it should be noted that a technical review may identify omissions in the submitted information.

It appears that your request is routine (see 1-3 below, as applicable).

1. New and amendment actions are normally completed within 90 days, unless we find major deficiencies, or policy issues requiring central program office assistance. You are required to provide your taxpayer identification number to our Fees Department. Please fill out the enclosed NRC Form 531.
2. Renewal actions are normally completed within 180 days, however, under timely filing (before expiration), you may continue to operate under your existing license.
3. Termination actions are normally completed within 90 days, unless confirmatory surveys following decontamination/decommissioning activities are involved.

A copy of your correspondence has been forwarded to our Licensing Fee and Debt Collection Branch (301/415-6097) for approval of the fee category and amount, if required.

We will try to complete your request as soon as practicable. Any correspondence about this request should reference the control number. Please direct any questions concerning your request to the Materials Licensing Branch at (630) 829-9887.

Materials Support Branch

Mail Control No. 304348
License No. 34-24437-01