

DEPARTMENT OF THE ARMY US ARMY CALIBRATION AND REPAIR CENTER SACRAMENTO SACRAMENTO ARMY DEPOT

SACRAMENTO, CALIFORNIA 95813-5035

REPLY TO

1986 MAR A I AM 10: DE

AMXTM-CW-SA

10 March 1986

BEG ON VICT

SUBJECT: Amendment to NRC BML #04-04279-01

THRU:

Commander

U.S. Army Materiel Command ATTN: AMCSF-P/85-0166 5001 Eisenhower Avenue Alexandria, VA 22333-0001

TO:

Nuclear Regulatory Commission

Region V

ATTN: Beth A. Riedlinger 1450 Maria Lane, Suite 210 Walnut Creek, CA 94596

- 1. Request Amendment to our NRC BML #04-04279-01 be made for J. L. Shepherd & Associates to remove and dispose the Cobalt-60 source, approximately 180 Ci from the Deep Well Calibrator and to install the 1100 Ci Cobalt-60 source, J. L. Shepherd Model 78-10M (encl 1).
- 2. Capsule testing data is provided on attached sheet (encl 2). Information on the shipping container is on J. L. Shepherd's Drawing Number A0147-10, Teletherapy Transfer Cask (encl 3), Drawing Number A-0147-6-2842, Teletherapy Transfer Cask (encl 4), and Drawing Number A-0147-18, Shield Transfer (encl 5).
- 3. USATSG Providing Leaders with the Decisive Edge.

5 Encls

FREDERICK T. TOYAMA

Chief, Army Primary Mucleonics Laboratory

Form AEC-313 (5-58) ATOMIC ENERGY COMMISSION

APPLICATION FOR BYPRODUCT MATERIAL LICENSE

Form approved Budget Bureau No. 38-R027 4

INSTRUCTIONS.—Complete Items 1 through 16 if this is an initial application. If application is for renewal of a license, complete only Items 1 through 7 and indicate new information or changes in the program as requested in Items 8 through 15. Use supplemental sheets where necessary. Item 16 must be completed on all applications. Mail three capies to: U. S. Atomic Energy Commission, Washington 25, D. C. Attention: Isotopes Branch, Division of Licensing and Regulation. Upon approval of this application, the applicant will receive an AEC Byproduct Material License. An AEC Byproduct Material License is issued in accordance with the general requirements contained in Title 10, Code of Federal Regulations, Part 30 and the Licensee is subject to Title 10, Code of Federal Regulations, Part 20.

1. (a) NAME AND STREET ADDRESS OF APPLICANT. (Institution, firm, hospital, person, etc.)	(b) STREET ADDRESS(ES) AT WHICH BYPRODUCT MATERIAL WILL BE USED (If different from 1 (a))
No Change	No Change
2 DEPARTMENT TO USE BYPRODUCT MATERIAL	3. PREVIOUS LICENSE NUMBER(S). (If this is an application for renewal of a license, please indicate and give number.) No Change
No Change 4. INDIVIDUAL USER(S). (Name and title of individual(s) who will use or directly supervise use of byproduct material. Give training and experience in Items 8 and	RADIATION PROTECTION OFFICER (Name of person designated as radiation pro- tection officer if other than individual user. Attack resume of his training and ex-
J. L. Shepherd personnel - (J. L. Shepherd, Richard M. Donelson, Eric Harrison Que Vu Pho, Nghia Vu Pho, and David Johnston). See Encl 6)	No Change
	ORM AND MAXIMUM NUMBER OF MILLICURIES OF EACH CHEMICAL AND OR PHYS SESS AT ANY ONE TIME. (If sealed source(s), also state name of manufacturer, model eximum activity per source.)

(1) Cobalt - 60

- (1) 180 Ci Source to be removed from the Deep Well Calibrator and transported to J. L. Shepherd facility, San Fernando, CA.
- (2) Cobalt 60
- (2) 1100 Ci Source, J. L. Shepherd Model 781 OM to be installed by J. L. Shepherd personnel.

7 DESCRIBE PURPOSE FOR WHICH BYPRODUCT MATERIAL WILL BE USED. (If byproduct material is for "human use," supplement A (Form AEC-313a) must be complement in lieu of this item. If byproduct material is in the form of a sealed source, include the make and model number of the storage container and/or device in which the source will be stored and/or used.)

Amend:

(1) See Reloading Procedure (encl 7) for detail step-by-step procedure for old source and new source transfer.

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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.

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CHEPHERD and Associates

1010 Arroyo, San Fernando, California 91340

(818) 898-2361

Irradiation & Calibration Equipment

Lead Shielding

Nuclear Applications

February 25, 1986

U.S. Army Calibration and Repair Center Sacramento - ASTN: AMXTM-CW-SA Sacramento Army Depot Sacramento, California 95813-5035

Attention: Fred Toyamo

Dear Mr. Toyamo:

Enclosed are the Special Form Testing for the source. The source capsule as discussed in our letter to Beth Riedlinger of U.S.N.R.C. (copy enclosed), is a custom Cobalt 60 source #A0081-2001 - ANSI #6C63434. Because this source is designed for a specific facility, it requires custom source treatment by the NRC. All necessary information has been previously forwarded and additional copies are enclosed with drawings A0147-10, A0147-18 and A0147-6-2842 which show the shipping and storage shield which we will use. The shield is a DOT 7A and we will be shipping in a 20WC overpack.

shoul!

JLS/jg

enclo: Special Form Cert. Dwg. A-0081-2001 Letter to B. Riedlinger, U.S.N.R.C. U.S. National Bur. of Standards #64 Drawings A0147-10, A0147-18 & A0147-6-2842

Technical Personnel Resumes

JLSHEPHERD and Associutes

740 Salem Street, Glendale, California 91203

213/245-0187

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CERTIFICATION

SUBJECT: 1,000 Ci Cobalt-60 source capsule, per J.L. Shepherd & Associates drawing A-0081-2001.

This is to certify that a prototype of the source capsule per drawing A-0081-2001 has been subjected to and successfully passed free drop, percussion, heating and immersion tests as called out in 10CFR 173.398.

Date: 10/16/85

J.L. Shepherd

JLS/jkg

SHEPHERD and Associates

740 Salem Street, Glerstile, California 91203

· 213/245-0187

Irradiation & Calibration Equipment . Load Chiefding .

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DATA SHEET - SPECIAL FORM CAPSULE TESTING

Capsule	Type: _	7810
Drawing	Number:	A-0081-2001

Capsule was loaded with 46 grams of inert co-60 Inner and outer capsules were heliarc welded in accordance with drawings and tests performed as below.

Date: 10/16/85

49CFR 173.398 Special Tests

1. Free Drop - 30' to 1/4" thick steel plate on concrete surface.

Results: No visible damage to capsule or welds.

2. Percussion - 1" diameter steel rod, wt. 3 lbs. dropped end on 4 times through 40" distance on capsule laying on 1/4" lead sheet on concrete surface.

Results: Sides and end of capsule were dented. No fracture of outer capsules or welds.

3. Heating - Capsule heated in air to 1475°F in electric furnace and held at this temperature 15 minutes - then allowed to cool. Results: Capsule discolored - no fracture of capsule ends, welds or walls.

4. Immersion - 24 hours in distilled water pH 7. maximum" conductivity of 10 micro-mhos/cm.

Results: No visible effect on capsule - no leaking of CsCl from inside capsule.

Leak Test:

- 1. Method: Bubble Test. Capsule heated to 240° in glycol.
- 2. Results: No bubbles emerged from capsule.

STATEMENT OF TRAINING AND EXPERIENCE

J. L. Shepherd President J. L. Shepherd & Associates 1010 Arroyo San Fernando, California 91340

TRAINING:

Bachelor of Science, Chemistry, Loyola University of Los Angeles, 1951; graduate work in nuclear chemistry, Notre Dame University and University of California at Los Angeles.

EXPERIENCE:

January, 1967 to Present

President and manager of J. L. Shepherd & Associates, engaged in consulting, engineering, and representation for nuclear applications, with emphasis on radiation and radiation measuring equipment, as well as radiation sources. Manufacturers of irradiation and calibration equipment.

April, 1959 to December, 1966

One of nine co-founders, Director and Vice President of U.S. Nuclear Corporation, Burbank, California. Research and development, design of custom products, field installation of sources and equipment, as well as management responsibilities.

August, 1955 to April, 1959

Director of industrial division and industrial sales for Isotopes Specialties Company, Burbank, California.

May, 1952 to June, 1955

6-16

Research Chemist for classified program with Aerojet General Corporation, Azusa, California, Research, development, and production of exotic high energy fuels specializing in reaction kinetics.

RADIOACTIVE MATERIALS PROCEDURES EXPERIENCE

Approximately 25 years experience in the following procedures: sealed source leak tests, instrument calibration, teletherapy source exchange & repair, source transfers, decontamination.

STATEMENT OF TRAINING AND EXPERIENCE

(Use additional sheets as necessary)

		tion: Every individual proposing to use radioactive material is required to submit a Statement of g and Experience in duplicate to the address given above. Physicians should request Form RH 2000 A pplying for human use authorizations.
1.	Na	ame of proposed user: Richard N. Donelson Position title: President
	Ad	dress: 6825 Bianca Ave. City: Van Ruye, CA Zip: 91406
	To	be included on Lic. No. 1534-20 in name of Plohard N. Donelson & Associates
2.	De	scription of proposed use Il proposed uses on attached application form RH 2050
3.	Tra	aining:
	a.	High School Graduate: Yes x No
	b.	College or University: Name and location University of Washington, Seattle, WA
		Years completed 5 Degree B9 Course of study Chemical Engineering
	c.	Education specifically applicable to use of radioactive material Graduate courses in Math and Physics. Six-month Health Physics training program - Hanford Atomic Works Various training programs required for certification by American Board of Health Physics (certified 1960, recertified through 1985).
4.	Exp	perience:
	a.	List experience with radioactivity beginning with most recent
		(1) Dates: From January 1967 to present
		Title and duties: President - Consulting Health Physicist
		Employer: R. N. Donelson & Assoc. Address: 6825 Bianca Ave., Van Muys, CA
		(2) Dates: From August, 1957 to January, 1967
		Title and duties: Chief Engr. /Prod. Mgr design and development of sources and
		devices, manufacturing of same, installation of same in the field.
		Employer: US Muclear/Isotope Spec. Co. Address: Burbank, California
		(3) Dates: From February 1948 to August, 1957
		Title and duties: Process Engr. Radiation Engr. Lisison Engr., Supr., Supr., Supr., Supr.,
		Process design, construction liaison, applied Fealth Physics & supr. of same. Employer:Address: Richland, Washington

b. Radioactive materials previously used. Cite typical radioisotopes in appropriate box and key to Part 4.a above:

Quantities Handled

	Microcuries	Millicuries	Curies	Kilocuries
Sealed sources	,		4.a. (3)	4.2. (2)
Unsealed alpha emitters	,	4.2. (1)		4.a. (2) 4.a. (3)
Unsealed beta- gamma emitters			4.a. (1)	4.a. (2) 4.a. (3)
Neutron sources			4.a. (1)	4.a. (3)

Describe procedures similar to those proposed in Part 2 with which you have had experience. Indicate months or years for each and key to Part 4.a above.

A-Sealed source leak tests - 36 years - 4.a. (1), 4.a. (2), 4.a. (3)

B-Instrument calibration - 36 years - 4.a. (1), 4.a. (2), 4.a. (3)

C-Teletherapy source exchange & repair - 22 years - 4.a. (1), 4.a. (2)

D-Source transfers - 36 years - 4.a. (2), 4.a. (3)

E-Source use in training - 32 years - 4.a. (1), 4.a. (2), 4.a. (3)

F-Decontamination - 36 years - 4.a. (1), 4.a. (2), 4.a. (3)

d. Indicate which types of facilities you have used and key to Part 4.a.

Ordinary Chemical laboratories 4.a. (1), 4.a. (2), 4.a. (3)

"Controlled Area" (Type B) laboratories 4.a. (1), 4.a. (2), 4.a. (3)

(3) Glove boxes 4.a. (1), 4.a. (2), 4.a. (3)

(xx) Shielded glove boxes 4.a. (2), 4.a. (3)

Caves with remote manipulators 4.a. (1), 4.a. (2), 4.a. (3)

Field operations with portable equipment 4.a. (1), 4.a. (2), 4.a. (3)

5. Certificate:

I hereby certify that all information contained in this Statement is true and correct.

Rill March 8, 1984

Signature of proposed user

Date

JLSHEPHERD and Associates

1010 Arroyo, San Fernando, California 91340

(818) 898-2361

Irradiation & Calibration Equipment

Lead Shielding

Nuclear Applications

February 25, 1986

ERIC HARRISON

September 1984 to Present

Mr. Eric Harrison has been employed by J.L. Shepherd & Associates as a Radiological Technician since September 1984.

During this time he has engaged in loading small sources in devices, leak testing calibration, assisted with radiologic controls and participated in servicing and installation of all types of J.L. Shepherd & Associates calibrators and irradiators. Mr. Harrison has also participated in an in house radiological training course and has responsibility for final radiological quality assurance for many of J.L. Shepherd & Associates calibrators and irradiators.

Mr. Harrison was employed by Monsanto Company, Dayton Engineered Products, as a Process Technician II from 1979 to 1984.

Qualifications:

Custom fabrication of a wide variety of nuclear radiation sources (neutron, alpha, gamma, etc.), primarily working with radioisotopes Pu-238, Am-241, Cf-252, Cs-137, Co-60 and others. Fully qualified for all phases of work in glove box or remote "hot cell", using master-slave manipulators and in use of programable T.I.G. welding systems in fabrication of radioactive source encapsulated in various metals such as stainless, maraging and titanium alloys, etc.; development of detailed processes for fabricating products requiring approved drawings, procedures, and practices for meeting nuclear quality requirements. Qualified in radiographic interpretation, liquid dye penetrant inspection, He mass spec. leak testing, use of measuring and gaging tools for dimensional inspection, preparation of metallographic samples, and has experience in electroplating, plastics fabrication, use of shop tools, i.e., mill, lathe, drillpress surface grinder, engraver etc.; also have performed various Health Physics technician duties of radiation and contamination surveys, setting-up, calibrating and using radiation measuring systems.

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Irradiation & Calibration Equipment

Lead Shielding

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QUE VU PHO

August 1982 to Present

As an employee of J.L. Shepherd & Associates since August 1982 to the present, Mr. Pho has had an extensive background in assembling major equipment both in house and in the field. He has participated in a specialized radiological training program and has assisted Mr. Donelson and Mr. Shepherd in all phases of installation and final check out of J.L. Shepherd & Associates equipment.

BACKGROUND EDUCATION

Three years at the University of Saigon - Vietnam

Major: Mechanical Engineering

Present:

Glendale College, Glendale, CA

Major:

Engineering Drawing

Five years Supervisor position in house

MANUFACTURERS

1010 Arroyo, San Fernando, California 91340

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Irradiation & Calibration Equipment

Lead Shielding

Nuclear Applications

February 25, 1986

NGHIA VU PHO

August 1983 to Present

Mr. Nghia Vu Pho, who has retained a position with J.L. Shepherd & Associates since August 1983, has assisted all of our other trained personnel with in house and field assembly of irradiators and calibrators. He has also attended our in house radiological training program and has received individual supervision and training from both Mr. Donelson and Mr. Shepherd.

BACKGROUND EDUCATION

One year at the University of Saigon - Vietnam

Major:

Mechanical Engineering

Present:

Glendale College, Glendale, CA

Major: Manufacturing Engineering

1010 Arroyo. San Fernando. California 91340

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DAVID JOHNSTON

Employee of J.L. Shepherd & Associates from September 1980 to present.

For the past four (4) years Mr. Johnston has had extensive training under the direction of J.L. Shepherd and D. Donelson in radiological procedures. Mr. Johnston has also been actively engaged and extensively involved in assembly, check out, servicing and installation of J.L. Shepherd & Associates irradiators and calibrators and has supervised the loading of large sources and equipment at contractors sites (Hot Cell). Mr. Johnston is responsible for final assembly, check out and calibration as well as gathering radiological data, ie: external radiation level measurement and leak testing of Model 89, Model 143, Mark I and other large calibrators and irradiators manufactured by J.L. Shepherd & Associates. In addition to working with Mr. Donelson and Mr. Shepherd extensively in radiation programs he has successfully participated in J.L. Shepherd & Associates formal in house radiological training program.

RELOADING PROCEDURE SACRAMENTO ARMY DEPOT

PURPOSE

1. This procedure covers the reloading of the Deep Well Calibrator facility at Bldg. 300, Sacramento Army Depot, Sacramento, CA.

DESCRIPTION OF WORK

- 1. The present source, approximately 180Ci of Co-60, will be removed from the facility by J.L. Shepherd & Associates personnel and transported in an authorized container to the J.L. Shepherd facility, San Fernando, CA for storage under California RAM License: #1777-70.
- 2. After unloading, Sacramento Army Depot personnel will perform maintenance on the well facility. This is expected to take about three (3) weeks.
- A new source, approximately 1000Ci of Co-60, will be loaded into the facility by J.L. Shepherd personnel.
- 4. The layout of the facility and the special equipment to be used is described in the attachments.

PROCEDURES

1.11

- General
 - a. All operations, other than maintenance operations on the empty well, will be under the direct supervision of one of the following:

J.L. Shepherd R.N. Donelson

b. At least two properly calibrated ion chamber survey meters will be available and all operations are to be monitored. A GM type survey meter will also be available for contamination checking.

- All personnel in the room are to wear film badges and self-reading pocket dosimeters.
- At least two, but not over three people are to be present in the room during source transfers. One of these persons will perform constant monitoring. d.
- In the event of any emergency, the room is to be vacated and any remedial action will be agreed to by Sacramento Army Depot and J.L. Shepherd personnel.
 - All shipments of radioactive material will be per DOT f. regulations.

2.

- Remove absorber turntable and drive motor. Note: A PREPARATION radiation level of about 6r/hr over the open well, with the source at the bottom of the well is expected. No parts of the body should be exposed over the open a.
 - Place aluminum plate on table and source retainer tube well. in well remotely and adjust mirror for viewing into b. the well,
 - Raise source holder and inspect for fit with retainer With remote handler, perform a wipe test on source. Lower source holder and adjust length of tube if necessary. If any contamination (over 0.005mci) is c. detected on wipe, cease operations until proper contamination control procedures can be formulated, as agreed upon by J.L. Shepherd and Bacramento Army Depot parties.
 - Remotely place aluminum plate on table and source retainer tube in well. Raise source and through mirror observe mating of source holder and source d. necessary. When mating is proper, lower source and retainer tube.

mark position of plate on table. Place 4 bricks on plate so as to form 4 x 4 opening. Slide plate and bricks over well to marked position. Re-insert source retainer tube remotely.

- e. Position teletherapy cask, containing new 1000-Ci source in one hole, in corner next to table (cask will be on dolly and pre-positioned for proper height). Remove end cap. Note: There will be slight radiation streaming upwards from loaded hole and no parts of the body should be exposed in this area.
- f. Place steel plate, bridging gap between teletherapy cask and table, in place.
- g. Erect lead-brick shielding trough, taking care to overlap cracks between bricks. Again use care to prevent personnel exposure over open well and teletherapy cask. The finished trough should provide 8" of lead shielding on the operators side and 4" of lead shielding on the opposite side (plus the 18" concrete wall.
- h. Remove teletherapy cask plug from empty hole using tool provided.
- i. With dummy source and magnetic handler, (source at bottom of well), practice the operation of moving source to cask several times. Make sure that lights and mirrors are such that entire operation can be viewed.

3. OLD SOURCE TRANSFER

- a. When both parties agree that operation is safe, raise source from bottom of well, lift source with magnetic handler, move along trough and lower into teletherapy cask. Extreme caution should be observed so that source is not raised above shielding trough.
- Using tool provided, insert plug above source in teletherapy cask.

c. Tear down enough of the lead brick trough so that the end cap can be installed in the teletherapy cask.

Note: depending upon the maintenance work to be done by Sacramento Army Depot, it may or may not be necessary to completely dismantle the trough and relocate the cask.

4. NEW SOURCE TRANSFER

- a. Remove end cap from teletherapy cask. Reinstall source retainer tube. Re-erect the lead brick trough as before.
- b. With source holder in upper position, practice moving the new source from the teletherapy cask to the well, using the magnetic handler and the dummy source, several times. Make sure that mirrors and lights are properly positioned.
- c. When both parties agree that the operation is safe, remove plug from new source hole in teletherapy cask using tool provided.
- d. Using magnetic handler, raise new source from teletherapy cask into trough and move it to the source holder in the well. Take extreme care to insure that the source is not raised above the shielding provided by the trough. Inspect source (by mirror) to insure it is properly positioned. Lower source to bottom of well. Replace plug in teletherapy shield.

5. REASSEMBLY

- a. Tear down lead brick trough taking care to prevent exposure over open well. Remove source retainer tube. Replace and cap on teletherapy shield. Note:
 A radiation level of about 35R/hr is now expected over open well.
- b. Remove teletherapy cask containing old source and prepare for shipment.

c. Reassemble absorber table, taking precaution to prevent exposure over well as soon as table is positioned, place heavy lead absorber in place and rotate over well. Complete assembly of table and drive motor.

APPENDIX

SPECIAL EQUIPMENT

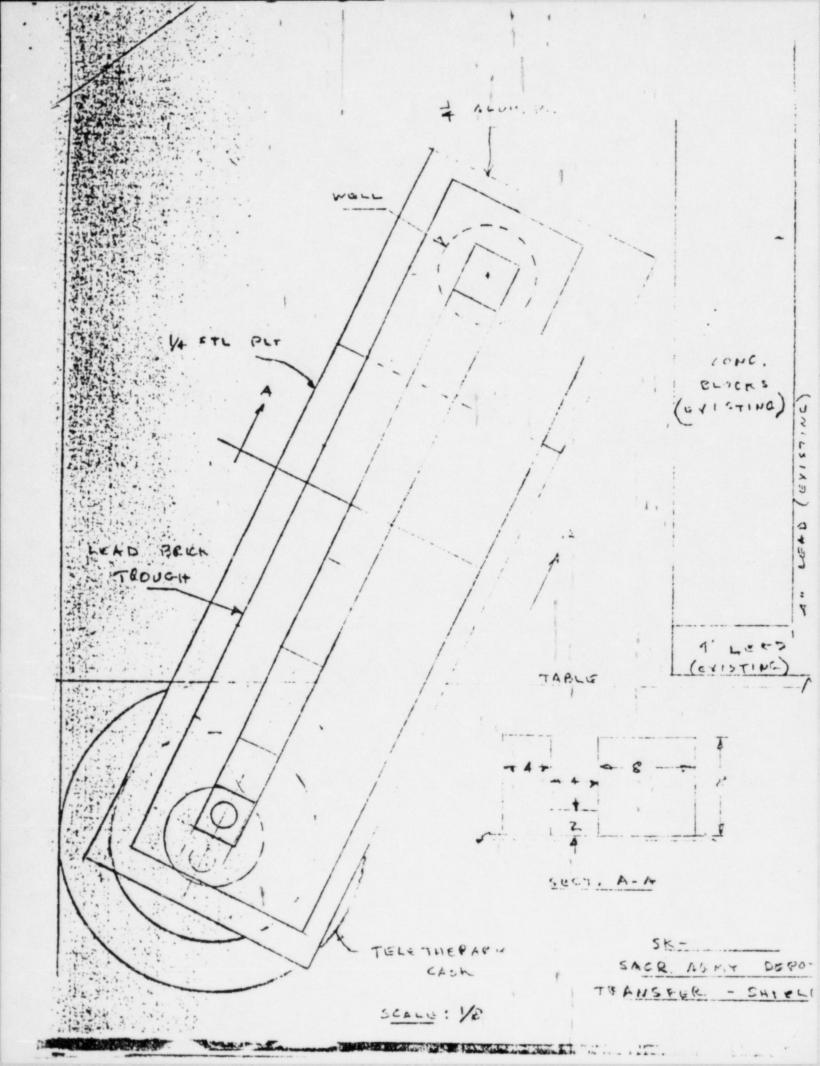
- Forklift for removing teletherapy cask overpack from truck, removing cask from overpack and placing on dolly.
- 4-wheeled dolly for moving cask into position and shoring for locating at proper height.
- Lights and mirrors. One mirror will be portable on a 5 foot handler.
- 4. Lead bricks for building shielding trough. Bags of lead shot as supplementary shielding. (If necessary.)
- 5. 4 foot electromagnetic handler.
- 6. 4 foot finger handler (for emergency.)
- 7. Source retainer tube and aluminum plate.
- Teletherapy cask plug removal tool.
- 9. Dummy source of same dimensions, weight, and magnetic properties as actual sources.
- 10. Steel plate for bridge between teletherapy cask and table.

EXPOSURE ESTIMATES

The following radiation levels are based on calculations and/or actual measurements at the facility;

		1000C1	180Ci
1.	Scatter at edge of table-open well	10mR/hr	1.8mR/hr
	source at bottom of well.		
2.	Same - source in upper position	60mR/hr	1 1 10mR/hr
3.	Scatter at edge of table opening	3mR/hr	0.6mR/hr
	reduced to 4x4 - source at bottom		
4.	Same - source in upper position	20mR/hr	3mR/hr
5.	During transfer of source in trough		
	Direct	7mm/hr	1mR/hr
	Scatter	120mR/hr	20mR/hr
	Total	127mR/	hr 21mR/hr
6.	Working in vicinity of teletherapy	2mR/hr	0.5mR/hr
	cask (1-4 ft.)		
Base	ed on these calculations and on the	followin	g estimates of
time	e, the following total exposures for	the job a	re:
1.	Turntable removed - 2 hrs @ 1.8mR/hr		3.6mrem
2.	Source retainer tube adjustment -		
	10 min.@ 1.8 to 3mR/hr		0.4mrem
3.	Teletherapy cask positioning -	,	*
	30 min.@ 2mR/hr		1.0mrem
4.	Erecting trough		1
	2 hrs. @ 0.6mR/hr (Scatter)	16 .	1.2mrem
	2 hrs. @ 2mR/hr (from csk)	11	4mrem
5.	Transferring e80Ci source	, 1 '	
	10 seconds @ 21mR/hr	1	0.1mrem
6.	Removing trough and relocating cask		
	1 hr. @ 2mR/hr		2mrem
7.	Re-erecting trough		
	2 hrs. @ 2mR/hr		4 mrem
8.	Transfering 1000Ci Source	1	
	10 seconds @ 127mR/hr	1	0.4mrem
9.	Removing trough and relocating cask	,	
	1 hr. @ 3mR/hr		3mrem
10.	Reinstalling turntable		
	1 hr. @ 10mR/hr	1	10mrem
	1 hr. @ 1mR/hr (hole shielded)	1	1 mrem
	appro		31mrem

Written by D. Donelson, Certified Health Physicist Approved by J.L. Shepherd



46 28" TROUCH TABLE - SOURCE IN TEL. CASK - SOURCE IN WELL

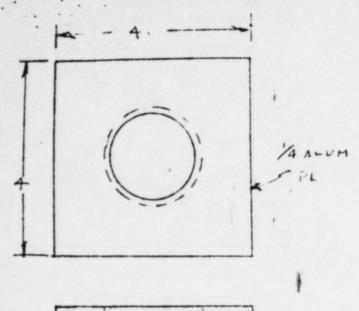
FLOOR

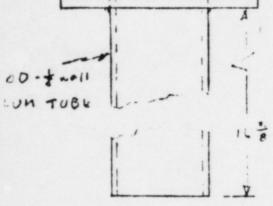
SCALE: &

S 14 -

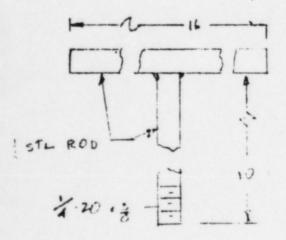
SACK ABOY DEPOT

MAGNETIC HANDLER

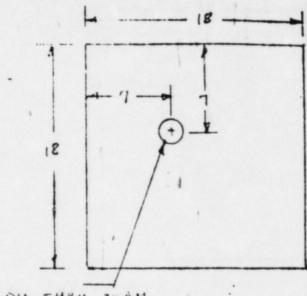




SOURCE RETAINED TUBE

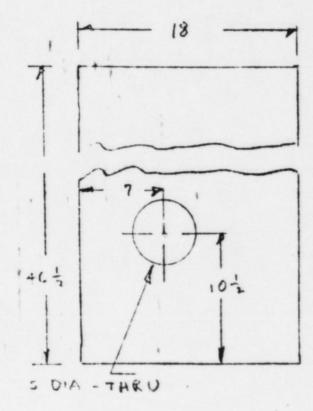


REMOVAL TOOL



FOX : I P FI WITH SOURCE KET. TOOK

MATL: + ALUM



MAT'L : 4 CE STORL



DEPARTMENT OF THE ARMY

HEADQUARTERS, U. S. ARMY MATERIEL COMMAND 5001 EISENHOWER AVENUE, ALEXANDRIA, VA 22333-0001

RECEIVEL

4 December 1985

1985 DEC 20 AM 10: 50

REGION VIET

U.S. Nuclear Regulatory Commission Region V ATTN: Materials Licensing Branch (Ms. Beth Riedlinger) 1450 Maria Lane, Suite 210

Walnut Creek, CA 94596

RE: AMCSF-P/85-0166

Gentlemen:

Forwarded are two copies of the Sacramento Army Depot request for amendment to License Number 04-04279-01. The request amends:

- (a) Individual users.
- (b) Radiation Protection Officers.
- (c) The cobalt-60 calibration source which is replaced by the 1100 curie JL Shepard Model 7810.

Please acknowledge receipt of correspondence on Mail Reply Card, DA Form 209.

Sincerely.

Chief, Health Physics,

Safety Office

Enclosures

Copies Furnished: HQDA(DASG-PSP-E) 5111 Leesburg Pike, Falls Church, VA 22041 w/encl Dir, AMC FSA, Charlestown, IN 47111-9669 w/encl COMMANDER

TMDE, ATTN: AMXTM-S, Redstone Arsenal, AL 35898 w/o encl Sacramento AD, ATTN: SDSSA-ASO, Sacramento, CA 95813 w/o encl

8602280003 1p.



DEPARTMENT OF THE ARMY US ARMY CALIBRATION AND REPAIR CENTER-SACRAMENTO SACRAMENTO ARMY DEPOT SACRAMENTO, CALIFORNIA 95813-5035

ATTENTION OF

AMXTM-CW-SA

1 November 1985

SUBJECT: Amendment of MRC BPM License #04-04279-01

Commander
US Army Material Command
ATTN: AMCSF-P
5001 Eisenhower Avenue
Alexandria, VA 22333

Request action be taken to amend the following paragraphs to our NRC BPM License #04-04279-01.

- a. Paragraph 4, Individual User, Appendix A.
- b. Paragraph 5, Radiation Protection Officer, Appendix A.
- c. Paragraph 6(a) and (b), Appendix B.
- d. Paragraph 7, Appendix C.

Encl
Appl for By-Product
Mat'l License

FREDERICK T. TOYAMA
Radiological Protection Officer
US Army Calbr & Repair Center-Sac

Form AEC-313 8-64 10 CFR 30 HTED STATES ATOMIC ENERGY COMMISSION

APPLICATION FOR BYPRODUCT MATERIAL LICENSE

Form approved Budget Bureau No 38-R027

INSTRUCTIONS.—Complete Items 1 through 16 if this is an initial application or an application for renewal of a license. Information contained in previous applications filed with the Commisson with respect to Items 8 through 15 may be incorporated by reference provided references are clear and specific. Use supplemental sheets where necessary. Hem 16 must be completed on all applications. Mail two copies to: U.S. Atomic Energy Commission, Washington, D.C., 20545, Attention: Isotopes Branch, Division of Materials Licensing. Upon approval of this application, the applicant will receive an AEC Byproduct Material License. An AEC Byproduct Material License is issued in accordance with the general requirements contained in Title 10, Code of Federal Regulations, Part 30, and the Licensee is subject to Title 10, Code of Federal Regulations, Part 20.

(a) NAME AND STREET ADDRESS OF A person, etc. Include ZIP Code.)	APPLICANT (Institution, firm, hospital	(b) STREET ADDRESS(ES) AT WHICH BYPRODUCT MATERIAL WILL BE USED (If different from 1 (a) Include ZIP Code.)				
No Change		No Change				
DEPARTMENT TO USE BYPRODUCT MATE	ERIAL	PREVIOUS LICENSE NUMBER(S) (If this is an application license, please indicate and give number)	for renewal of a			
No Change		No Change				
٠) ــــــــــــــــــــــــــــــــــــ	e, Robert L. Butler, s users for all of	S RADIATION PROTECTION OFFICER (Name of person designant become officer if other than individual user Affach resums of persence as in thems 8 and 9) Amend: Frederick T. Toyama RPO Elbert E. Anderson Alternate Charles R. Waliace of RPO				
 (a) BYPRODUCT MATERIAL (Elements and mass number of each) 	(b) CHEMICAL AND/OR PHYSICAL FI ICAL FORM THAT YOU WILL POS number, number of sources and mo		CAL AND/OR PHYS- manufacturer, model			
Amend:	Amend:					
(1) Cobalt-60	(1) 1100 Curies s	ealed source, JL Shepard Model 78	10			

7 DESCRIBE PURPOSE FOR WHICH BYPRODUCT MATERIAL WILL BE USED. (If byproduct material is for "human use," supplement A (form AEC-313a) must be completed in lieu of this item. If byproduct material is in the form of a sealed source, include the make and model number of the storage container and/or device in which the source will be sized and/or used.)

Amend:

(1) 1100 curies Cobalt-60 source will be used to replace existing Cobalt-60 Source in the Deep-Well Calibrator.

TRAINING AND EX	PER VCE OF E	ACH INDIVIDU	JAL NAM	ED IN ITE	A 4 (Use suppleme	ental sheets if n	necessary)	
3. TYPE OF TRAINING		WHERE !	TRAINED		DURATION		HE JOB .		COURSE onswer)
Principles and practices of radiate protection	on					Yes	No	Yes	No
Radioactivity measurement standardi- tion and monitoring techniques and struments		Change				Yes	No	Yes	No
Mathematics and calculations basic to use and measurement of radioactivity						Yes	No	Yes	No
Biological effects of radiation						Yes	No	Yes	No
EXPERIENCE WITH RADIATION (Act	where experience		nt experie		N OF EXPERIENCE			OF USE	
	No Chang	ţe.							
O. RADIATION DETECTION INSTRUMEN	1	mental sheets if me							
TYPE OF INSTRUMENTS (Include make and model number of each)	NUMBER AVAILABLE	RADIATION DETECTED		WITY RANGE	(mg/cm²)			USE urveying, med	easuring)
No Change 12. FILM BADGES, DOSIMETERS, AND BIO-					I of calibrating and pr	ocessing, or no	me of sup	oplier.)	
INFORM	TON TO BE	CHAMITTEE	ON A	DO TON!	AL SHEETS IN D	TANK WATE			
13. FACILITIES AND EQUIPMENT. Describ of facility is attached. (Circle answer)		ies and remote ha	andling equi				etc. Ex	uplanatory s	ketch
 RADIATION PROTECTION PROGRAM. testing procedures where applicable, no icing, maintenance and repair of the so 	me, training, and e	lation protection p	program inc						
15 WASTE DISPOSAL If a commercial w be used for disposing of radioactive wa	aste disposal service	e is employed, sp					tion of m	ethods which	th will
	CERTIFICATE	(This Item r	nust be	complete	d by applicant)				
16. THE APPLICANT AND ANY OFFICIAL PREPARED IN CONFORMITY WITH TITLE SUPPLEMENTS ATTACHED HERETO, IS	10, CODE OF FEDE	ERAL REGULATION	NS, PART 3	O, AND THAT	T ALL INFORMATION				
Date 1 Mar 1915				By: L	nomed in item ! -	T. Coy			
				RP	0 - US	ACIZE	- 5	SAC	/

1

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.

APPENDIX A OCT 1985
Resume' of Experience and Training of Radiological Protection Officer, Frederick T. Toyama (BS, Physics)

a.	TYPE	OF TRAINING	WHERE TRAINED		DURATION OF TRAINING	ON THE JOB	FORMAL
	(1)	Principles and practices	USN Radiological	Training School	2 months		Yes
		of radiation protection	Sacramento State	College	2 years		Yes
			US Public Health	Service	2 months		Yes
	(2)	Radioactivity Measurement	USN Radiological	Training School	2 months		Yes
		standardization and monitoring	Sacramento State	College	2 years		Yes
		techniques and instruments	US Public Health	Service	2 months		Yes
	(3)	Mathematics and calculations	USN Radiological	Training School	2 months		Yes
		basic to the use and measure-	Sacramento State	College	2 years		Yes
		ment of radioactivity	US Public Health	Service	2 months		Yes
	(4)	Biological effects of	USN Radiological	Training School	2 months		Yes
		radiation	Sacramento State	College	2 years		Yes
			US Public Health		2 months		Yes

ISOTOPE	MAXIMUM AMT	WHERE EXPERIENCE WAS GAINED	DURATION	TYPE OF USE
Co-60	120 curies	Sacramento Army Depot	5 years	Calibration
Co-60	500 curies	Sacramento Army Depot	8 years	Calibration
Co-60	1000 curies	Sacramento Army Depot	13 years	Calibration
Cs-137	1 curie	Sacramento Army Depot	22 years	Calibration
Pu-239	5 curies	Sacramento Army Depot	21 years	Calibration
Hydrogen-3	3 curies	Sacramento Army Depot	16 years	Neutron Production
Radium-226	.05 grams	Sacramento Army Depot	22 years	Calibration
Krypton-85	5 curies	Sacramento Army Depot	11 years	Calibration
Iodine-131	8 microcuries	Sacramento Army Depot	20 years	Unsealed Source
Chromium-51	40 microcuries	Sacramento Army Depot	8 years	Unsealed Source
Cesium-137	1 microcurie	Sacramento Army Depot	11 years	Unsealed Source
Promethium-147	8 microcuries	Sacramento Army Depot	5½ years	Unsealed Source
Chlorine-36	1 microcurie	Sacramento Army Depot	4 years	Unsealed Source
Iron-55	40 microcuries	Sacramento Army Depot	4 years	Unsealed Source
Carbon-14	40 microcuries	Sacramento Army Depot	10 years	Unsealed Source

а.	TYPE	OF TRAINING	WHERE TRAINED	DURATION OF ON TRAINING THE JOB	FORMAL
	(1)	Principles and practices of radiation protection	US Public Health Service	1 month	Yes
	(2)	Radioactivity measurement standardization and monitoring techniques and instruments	US Public Health Service	1 month	Yes
	(3)	Mathematics and calculations basic to the use and measure- ment of radioactivity	US Public Health Service	1 month	Yes
	(4)	Biological effects of radiation	US Public Health Service	1 month	Yes

Osotope	Maximum Amt	Where Experience was Gained	Duration	Type of Use
Co-60	500 curies	Sacramento Army Depot	4 years	Calibration
Co-60	1000 curies	Sacramento Army Depot	12 years	Calibration
Cs-137	1 curie	Sacramento Army Depot	17 years	Calibration
Cs-137	600 curies	Sacramento Army Depot	15 years	Calibration
Pu-239	5 curies	Sacramento Army Depot	17 years	Calibration
Ra-226 .	0.5 grams	Sacramento Army Depot	17 years	Calibration

Resume' of Experience and Training of Alternate Radiological Protection Officer Charles R. Wallace

а.	TYPE	OF TRAINING	WHERE TRAINED	DURATION OF TRAINING	ON THE JOB	FORMAL
	(1)	Principles and practices	Sacramento Army Depot US Public Health	2 years 2 weeks	Yes	Yes
		of radiation protection	Ft. McClellan, AL	3 weeks		Yes
	(2)	Radioactivity measurement standardization and monitoring	Sacramento Army Depot US Public Health	2 years	Yes	Yes
		techniques and instruments	Ft. McClellan, AL	3 weeks		Yes
	(3)	Mathematics and calculations	Sacramento Army Depot	2 years	Yes	
	,	basic to the use and measure-	US Public Health	2 weeks		Yes
		ment of radioactivity	Ft. McClellan, AL	3 weeks		Yes
	(4)	Biological effects of	Sacramento Army Depot	2 years	Yes	
	(4)	radiation	US Public Health	2 weeks		Yes
		1801811011	Ft. McClellan, AL	3 weeks		Yes

Isotope	Maximum Amt	Where Experience was Gained	Duration	Type of Use
Co-60	500 curies	Sacramento Army Depot	8 years	Calibration
Co-60	120 curies	Sacramento Army Depot	4 years	Calibration
Co-60	1000 curies	Sacramento Army Depot	13 years	Calibration
Cs-137	l curie	Sacramento Army Depot	22 years	Calibration
Pu-239	5 curies	Sacramento Army Depot	21 years	Calibration
Ra-226	0.5 grams	Sacramento Army Depot	20 years	Calibration
Cs-137	600 curies	Sacramento Army Depot	19 years	Calibration
X-Ray	250 KVCP	Sacramento Army Depot	22 years	Calibration
Van de Graaff Accelerator	400 KV	Sacramento Army Depot	12 years	Calibration

Resume' of Experience and Training of Quan Y. Luke

a.	TYPE	OF TRAINING	WHERE TRAINED	DURATION OF TRAINING	ON THE JOB	PORMAL
	(1)	Principles and practices of radiation protection	Sacramento Army Depot US Public Health	2 years 2 weeks	Yes	Yes
	(2)	Radioactivity measurement standardization and monitoring techniques and instruments	Sacramento Army Depot US Public Health	2 years 2 weeks	Yes	Yes
	(3)	Mathematics and calculations basic to the use and measure- ment of radioactivity	Sacramento Army Depot US Public Health	2 years 2 weeks	Yes	Yes
	(4)	Biological effect of radiation	Sacramento Army Depot US Public Bealth	2 years 2 weeks	Yes	Yes

Isotopes	Maximum Amt	Where Experience was Gained	Duration	Type of Use
Co-60 Co-60 Co-60 Cs-137 Pu-239 Ra-226 Cs-137 X-Ray	120 curies 500 curies 1000 curies 1 curie 5 curies 0.5 grams 600 curies 250 KVCP	Sacramento Army Depot	2 years 8 years 13 years 22 years 21 years 20 years 19 years 18 years	Calibration Calibration Calibration Calibration Calibration Calibration Calibration Calibration
Van de Graaff Accelerator	400 KV	Sacramento Army Depot	3 years	Calibration .

A.	Туре	e of Training	Where Trained	Training	Job_	Formal
	(1)	Principles and Practices Radiation Protection	Sacramento Army Depot USN Radiological Training School	1 Year 2 Mos	Yes	Yes
	(2)	Radioactivity measurement stand- ardization and monitoring tech- niques and instruments.	Sacramento Army Depot USN Radiological Training School	1 Year 2 Mos	Yes	Yes
	(3)	Mathematics and calculations basic to the use and measurement of radioactivity	Sacramento Army Depot USN Radiological Training School	1 Year 2 Mos	Yes	Yes
	(4)	Biological effect of radiation	Sacramento Army Depot USN Radiological Training School	1 Year 2 Mos	Yes	Yes

B. Experience with Radistion

Isotopes	Maximum Amt.	Where Experience was Gained	Duration	Type of Use
Co-60	1000 curies	Sacramento Army Depot	2 years	Calibration
Cs-137	1 curies	Sacramento Army Depot	2 years	Calibration
Cs-137	600 curies	Sacramento Army Depot	2 years	Calibration
Pu-239	5 curies	Sacramento Army Depot	2 years	Calibration
Ám-241	4 curies	Sacramento Army Depot	2 years	Calibration
Radium-226	0.5 grams	Sacramento Army Depot	2 years	Calibration

Α.	Туре	of Training	Where Trained	Duration of Training	On The	Formal
	(1)	Principles and Practices of Radiation Protection	Sacramento Army Depot USN Radiological Training School	10 Mos 2 Mos	Yes	Yes
	(2)	Radioactivity measurement stand- ardization and monitoring tech- niques and instruments.	Sacramento Army Depot USN Radiological Training School	10 Mos 2 Mos	Yes	Yes
	(3)	Mathematics and calculations basic to the use and measurement of radioactivity	Sacramento Army Depot USN Radiological Training School	10 Mos 2 Mos	Yes	Yes
	(4)	Biological effect of radiation	Sacramento Army Depot USN Radiological Training School	10 Mos 2 Mos	Yes	Yes

B. Experience with Radiation

Isotopes	Maximum Amt,	Where Experience was Gained	Duration	Type of Use
Co-60	1000 curies	Sacramento Army Depot	1½ years	Calibration
Cs-137	1 curies	Sacramento Army Depot	1½ years	Calibration
Cs-137	600 curies	Sacramento Army Depot	1½ years	Calibration
Pu-239	5 curies	Sacramento Army Depot	1½ years	Calibration
Am-241	4 curies	Sacramento Army Depot	1½ years	Calibration
Radium-226	0.5 grams	Sacramento Army Depot	1½ years	Calibration

APPENDIX B

- 6.(a) Byproduct material (Elements & Mass Number of each)
 - A. Cobalt-60
 - B. Cobalt-60
 - C. Cobalt-60
 - D. Cobalt-60
 - E. Cobalt-60
 - F. Cesium-137
 - G. Cesium-137

- H. Cesium-137
- I. Americium 241

- (b) Chemical and/or physical form and maximum amount of radioactivity which licensee may possess at any one time.
- A. Sealed source, J.L. Shepard Model 7810, one source of 10 curies.
- B. AECL Model C-132 sealed source, one source of 1100 curies.
- C. ORNL sealed source, one source of 9 curies.
- D. ORNL sealed source, one source of 3 curies.
- E. Metallic Cobalt, 40 curies maximum, four sealed sources in AN/UDM-1 Calibrator Set manufactured by National Electrical Machine Shops, Inc 10 curies each.
- F. ORNL sealed source, one source of 10 curies.
- G. Cesium chloride. Maximum at any one time is 2100 curies. Note that there are three identical radiac calibrators, AN/TDM-2 involved, each containing 11 sealed sources totaling not more than 700 curies per calibrator; for detail of the individual sources see attached Table 1.

Sources were manufactured and in capsulated by Oak Ridge National Lab; capsules are the standard design of ORNL (See attached drawing #424695).

- H. Cesium chloride, 260 curies maximum, two sealed sources in AN/UDM-1A Calibrator Set, radiac, manufactured by National Electrical Machine Shop, Inc. 130 curies each.
- I. Americium dioxide pelletized in an intimate mixture with beryllium and sealed in a standard source capsule manufactured by Nuclear Material & Equipment Corporation. Six sources of one curie each(mdl #AM-31-1) total of six curies.

· minima of

Appendix B (Cont'd)

- J. Americium 241
- K. Krypton-85
- L. Krypton-85
- M. Hydrogen 3
- N. Cesium 137
- O. Byproduct Material
- P. Cobalt-60
- Q. Cobalt-60

- J. Americium dioxide, pelletized in an intimate mixture with beryllium and sealed in a standard source capsule manufactured by Nuclear Material & Equipment Corporation. One source of four curies (model #AM-123-2).
- K. Solid crystalline clothrate of hydroquinme, 5 curies.
- L. Total quantity of Krypton 85, 60 curies in MX-7338/PDR-27R Radioactive Test Samples (Multronics, Inc. drawing A12822A44 and A12822A45). No single source to exceed seven millicuries.
- M. Titanium-tritide targets, 20 curies contained in two targets of 10 curies each.
- N. Sealed Source 130 curies J. L. Shepard Model A0096 in Radiac Calibrator Set, AN/UDM-1A.
- O. Any chemical or physical form. Isotopes and quantities listed in 10 CFR 33.100, Schedule A, Column II.
- P. Sealed Source, Picker Model P-3802A, one source, not to exceed 5,000 curies. Depleted uranium used as shielding in the head.
- Q. Sealed source, J.L. Shepard Model 7810, one source of 1100 curies.

APPENDIX C

- 7. Describe purpose for which By-Product Material will be used:
- A. For use in AN/UDM-1 Radiac Calibrator for calibration of instruments and film badges.
- B. For use in Calibrator-Deep Well for calibration of instruments and film badges.
 - C. For use in AN/UDM-1 Radiac Calibrator for calibration of instruments.
- D. For use in 360 Calibrator (Dwg No SD-D-60-10005) for calibration of dosimeters and film badge standards.
- E. The four ten-curies Cobalt-60 source will be held in depot for repair, storage, and issue to properly licensed agencies; storage area is shown in Drawing No 1.
- F. For use in Low Intensity Calibrator (Dwg No SD-D-60-10002) for calibration of instruments.
- G. Radiac Calibrator, AN/TDM-2 will be used in calibration of radiation detection instruments. The sources are hermetically sealed in two concentric stainless steel cylinders and placed in three lead shields of similar design which vary only with respect to size, weight and number of sources inclosed; two of the shields hold three sources; the other, five sources. Each shield is located in a console. For console details, see Figure 1 (Appendix E).

The radioactive source capsules are held snugly in the source-selector wheel by a steel face place which is affixed to the source-selector wheel with machine bolts. The desired source is "dialed" into position, with springloaded detents assuring positive positioning. For source-selector wheel details, see Figure 1 (Appendix C) and Figure 3 (Appendix E).

- H. The two 130 curies Cesium sources will be held in depot for repair, storage, and issue to properly licensed agencies; storage area is shown on Drawing No 1.
- I. Six Americium Beryllium sources will be incorporated in a standard thermal neutron geometry, for use in irradiation of foils and detectors by thermal neutrons. See Drawing No 2.
- J. One Americium Beryllium source will be inclosed in a paraffin-filled storage container and used as a fast neutron source. See Drawing No 3.
 - K. Irradiation of film standards and calibration of instruments.
 - L. For storage and evaluation only.
- M. Production of neutrons in a positive-ion accelerator for film badge and instrument evaluation and calibration, and for research on personnel dosimetry systems.

APPENDIX C cont.

- N. One hundred thirty Ci Cesium-137 source in the Madiac Calibrator Set AN/UDM-1A will be used for calibration of instruments and film badges.
- O. Preparation of film badge standards and calibration standards for laboratory counting systems.
 - P. For use in Picker Model C-9 Teletheraphy Unit for calibration of instruments.
- Q. 1100 Curies Cobalt-60 source will be used to replace existing Cobalt-60 source in the Deep-Well Calibrator.

JL SHEPHERD and Associates

740 Salem Street, Glendale, California \$1203

213/245-0187

o Irradiation & Calibration Equipment

Leed Shielding

Nuclear Applications

October 16, 1985

Department of the Army United States Army Missile Command Redstone Arsenal, Alabama 35898

half

Attention: AMSMI-PC-CD/ Gary Poolos

Dear Mr. Poolos;

Reference soliciation DAAHOL-85-R-0573, the 1000 Ci nominal 60 Colbalt source which we will provide will be manufactured by General Electric, Vallecitos Laboratory. The source type will be a J.L. Shepherd & Associates 7810. Because the source requires a magnetic end for handling, which is not normally incorporated in a type 7810, J.L. Shepherd will supply complete drawings, special form testing certifications and other documentation required for licensing the source at the Sacramento facilities.

A drawing of the source and copies of the necessary certification are included. Please note that the dimension configuration will be compatible with the Sacramento Signal Depot Well facility.

J. L. Shepherd

JLS/jg ENCLO THUER COPSUL

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GOODS JANEAFER MEE

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L. CHEPTON

DRAWN BY DATE APPROVED BY SCALF

17. 1810, CAPSULT FOR

JLSMEPHERD and Associates

740 Salem Street, Glendale, California 91203

213/245-0187

triadiation & Calibration Equipment

Lead Shielding

Nuclear Applications

CERTIFICATION

SUBJECT: 1,000 Ci Cobalt-60 source capsule, per J.L. Shepherd & Associates drawing A-0081-2001.

This is to certify that a prototype of the source capsule per drawing A-8081-2001 has been subjected to and successfully passed free drop, percussion, heating and immersion tests as called out in 10CFR 173.398.

Date: 10/16/85

J.L. Shephe

JL8/jkg

JLSHEPHERD and Associates

740 Salem Street, Glendale, California 91203

213/245-0187

tradiation & Calibration Equipment

Lead Shielding

Nuclear Applications

DATA SHEET - SPECIAL FORM CAPSULE TESTING

Capsule Type: 7810
Drawing Number: A-0081-2001

Capsule was loaded with 46 grams of inert co-60

Inner and outer capsules were heliarc welded in accordance with drawings and tests performed as below.

Date: 10/16/85

49CFR 173.398 Special Tests

1. Free Drop - 30' to 1/4" thick steel plate on concrete surface.

Results: No visible damage to capsule or welds.

2.Percussion - 1" diameter steel rod, wt. 3 lbs. dropped end on 4 times through 40" distance on capsule laying on 1/4" lead sheet on concrete surface.

Results: Sides and end of capsule were dented. No fracture of outer capsules or welds.

3. Heating - Capsule heated in air to 1475°F in electric furnace and held at this temperature 15 minutes - then allowed to cool. Results: Capsule discolored - no fracture of capsule ends, welds or walls.

4.Immersion - 24 hours in distilled water pH 7, maximum conductivity of 10 micro-mhos/cm.

Results: No visible effect on capsule - no leaking of CsCl from inside capsule.

Leak Test:

1. Method: Bubble Test. Capsule heated to 240° in glycol.

2. Results: No bubbles emerged from capsule.

J.L. Shepherd