

APPLICATION FOR BYPRODUCT MATERIAL LICENSE
INDUSTRIAL

1. APPLICATION FOR:
(Check and/or complete as appropriate)

a. NEW LICENSE

b. AMENDMENT TO:
LICENSE NUMBER
X 06-20804-01

c. RENEWAL OF:
LICENSE NUMBER

See attached instructions for details.

Completed applications are filed in duplicate with the Division of Fuel Cycle and Material Safety, Office of Nuclear Material Safety, and Safeguards, U.S. Nuclear Regulatory Commission, Washington, DC 20555 or applications may be filed in person at the Commission's office at 1717 H Street, NW, Washington, D. C. or 7915 Eastern Avenue, Silver Spring, Maryland.

2. APPLICANT'S NAME (Institution, firm, person, etc.)

Brandhurst Corporation

TELEPHONE NUMBER: AREA CODE -- NUMBER EXTENSION
(203) 798-1131

3. NAME AND TITLE OF PERSON TO BE CONTACTED
REGARDING THIS APPLICATION

Ronald G. Harper

TELEPHONE NUMBER: AREA CODE -- NUMBER EXTENSION
(203) 798-1131

4. APPLICANT'S MAILING ADDRESS (Include Zip Code)

(Address to which NRC correspondence, notices, bulletins, etc., should be sent.)

87 Sand Pit Road
Danbury, CT 06810

5. STREET ADDRESS WHERE LICENSED MATERIAL WILL BE USED
(Include Zip Code)

87 Sand Pit Road
Danbury, CT 06810

(IF MORE SPACE IS NEEDED FOR ANY ITEM, USE ADDITIONAL PROPERLY KEYED PAGES.)

6. INDIVIDUAL(S) WHO WILL USE OR DIRECTLY SUPERVISE THE USE OF LICENSED MATERIAL

(See Items 16 and 17 for required training and experience of each individual named below)

	FULL NAME	TITLE
a.	Ronald G. Harper	Vice President
b.		
c.		

7. RADIATION PROTECTION OFFICER

Attach a resume of person's training and experience as outlined in Items 16 and 17 and describe his responsibilities under Item 15.

8. LICENSED MATERIAL

L I N E	ELEMENT AND MASS NUMBER	CHEMICAL AND/OR PHYSICAL FORM	NAME OF MANUFACTURER AND MODEL NUMBER (If Sealed Source)	MAXIMUM NUMBER OF MILLICURIES AND/OR SEALED SOURCES AND MAXIMUM ACTI- VITY PER SOURCE WHICH WILL BE POSSESSED AT ANY ONE TIME
NO.	A	B	C	D
(1)	Hydrogen	GTLS	See Item 8E	See Item 8E
(2)	3 (Tritium)			
(3)				
(4)				

DESCRIBE USE OF LICENSED MATERIAL
E

(1) See attached

(2)

(3)

(4)

8902150347 870423
REG1 LIC30
06-20804-01 PNU

Log	Mar. 3/1
Remitter	
Check No.	090
Amount	\$60
Fee Category	3P
Type of Fee	Amendment
Date Check Rec'd.	3/5/87
Date Completed	3/5/87
By:	S. C. C. C. C.

107012

9. STORAGE OF SEALED SOURCES

LINE NO.	CONTAINER AND/OR DEVICE IN WHICH EACH SEALED SOURCE WILL BE STORED OR USED. A.	NAME OF MANUFACTURER B.	MODEL NUMBER C.
(1)	Not Applicable		
(2)			
(3)			
(4)			

10. RADIATION DETECTION INSTRUMENTS

LINE NO.	TYPE OF INSTRUMENT A	MANUFACTURER'S NAME B	MODEL NUMBER C	NUMBER AVAILABLE D	RADIATION DETECTED (alpha, beta, gamma, neutron) E	SENSITIVITY RANGE (milliroentgens/hour or counts/minute) F
(1)	Not Applicable					
(2)						
(3)						
(4)						

11. CALIBRATION OF INSTRUMENTS LISTED IN ITEM 10

<input type="checkbox"/> a. CALIBRATED BY SERVICE COMPANY NAME, ADDRESS, AND FREQUENCY Not Applicable	<input type="checkbox"/> b. CALIBRATED BY APPLICANT <i>Attach a separate sheet describing method, frequency and standards used for calibrating instruments.</i> Not Applicable
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12. PERSONNEL MONITORING DEVICES

TYPE (Check and/or complete as appropriate.) A	SUPPLIER (Service Company) B	EXCHANGE FREQUENCY C
<input type="checkbox"/> (1) FILM BADGE <input type="checkbox"/> (2) THERMOLUMINESCENCE DOSIMETER (TLD) <input type="checkbox"/> (3) OTHER (Specify): _____ 	Not Applicable	<input type="checkbox"/> MONTHLY <input type="checkbox"/> QUARTERLY <input type="checkbox"/> OTHER (Specify): _____

13. FACILITIES AND EQUIPMENT (Check where appropriate and attach annotated sketch(es) and description(s).)

- ☐ a. LABORATORY FACILITIES, PLANT FACILITIES, FUME HOODS (Include filtration, if any), ETC.
☐ b. STORAGE FACILITIES, CONTAINERS, SPECIAL SHIELDING (fixed and/or temporary), ETC.
☐ c. REMOTE HANDLING TOOLS OR EQUIPMENT, ETC.
☐ d. RESPIRATORY PROTECTIVE EQUIPMENT, ETC. See attached

14. WASTE DISPOSAL

- a. NAME OF COMMERCIAL WASTE DISPOSAL SERVICE EMPLOYED
Per Specific License 06-20804-01
- b. IF COMMERCIAL WASTE DISPOSAL SERVICE IS NOT EMPLOYED, SUBMIT A DETAILED DESCRIPTION OF METHODS WHICH WILL BE USED FOR DISPOSING OF RADIOACTIVE WASTES AND ESTIMATES OF THE TYPE AND AMOUNT OF ACTIVITY INVOLVED. IF THE APPLICATION IS FOR SEALED SOURCES AND DEVICES AND THEY WILL BE RETURNED TO THE MANUFACTURER, SO STATE.

9. STORAGE OF SEALED SOURCES			
LINE NO.	CONTAINER AND/OR DEVICE IN WHICH EACH SEALED SOURCE WILL BE STORED OR USED. A.	NAME OF MANUFACTURER B.	MODEL NUMBER C.
(1)	Not Applicable		
(2)			
(3)			
(4)			

10. RADIATION DETECTION INSTRUMENTS						
LINE NO.	TYPE OF INSTRUMENT A	MANUFACTURER'S NAME B	MODEL NUMBER C	NUMBER AVAILABLE D	RADIATION DETECTED (alpha, beta, gamma, neutron) E	SENSITIVITY RANGE (milliroentgens/hour or counts/minute) F
(1)	Not Applicable					
(2)						
(3)						
(4)						

11. CALIBRATION OF INSTRUMENTS LISTED IN ITEM 10	
<input type="checkbox"/> a. CALIBRATED BY SERVICE COMPANY NAME, ADDRESS, AND FREQUENCY Not Applicable	<input type="checkbox"/> b. CALIBRATED BY APPLICANT <i>Attach a separate sheet describing method, frequency and standards used for calibrating instruments.</i> Not Applicable

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13. FACILITIES AND EQUIPMENT (Check where appropriate and attach annotated sketch(es) and description(s).)
<input type="checkbox"/> a. LABORATORY FACILITIES, PLANT FACILITIES, FUME HOODS (Include filtration, if any), ETC. <input type="checkbox"/> b. STORAGE FACILITIES, CONTAINERS, SPECIAL SHIELDING (fixed and/or temporary), ETC. <input type="checkbox"/> c. REMOTE HANDLING TOOLS OR EQUIPMENT, ETC. <input type="checkbox"/> d. RESPIRATORY PROTECTIVE EQUIPMENT, ETC. See attached

14. WASTE DISPOSAL
a. NAME OF COMMERCIAL WASTE DISPOSAL SERVICE EMPLOYED Per Specific License 06-20804-01
b. IF COMMERCIAL WASTE DISPOSAL SERVICE IS NOT EMPLOYED, SUBMIT A DETAILED DESCRIPTION OF METHODS WHICH WILL BE USED FOR DISPOSING OF RADIOACTIVE WASTES AND ESTIMATES OF THE TYPE AND AMOUNT OF ACTIVITY INVOLVED. IF THE APPLICATION IS FOR SEALED SOURCES AND DEVICES AND THEY WILL BE RETURNED TO THE MANUFACTURER, SO STATE.

INFORMATION REQUIRED FOR ITEMS 15, 16 AND 17

Describe in detail the information required for Items 15, 16 and 17. Begin each item on a separate page and key to the application as follows:

15. RADIATION PROTECTION PROGRAM. Describe the radiation protection program as appropriate for the material to be used including the duties and responsibilities of the Radiation Protection Officer, control measures, bioassay procedures (if needed), day-to-day general safety instruction to be followed, etc. If the application is for sealed source's also submit leak testing procedures, or if leak testing will be performed using a leak test kit, specify manufacturer and model number of the leak test kit.
16. FORMAL TRAINING IN RADIATION SAFETY. Attach a resume for each individual named in Items 6 and 7. Describe individual's formal training in the following areas where applicable. Include the name of person or institution providing the training, duration of training, when training was received, etc.
 - a. Principles and practices of radiation protection.
 - b. Radioactivity measurement standardization and monitoring techniques and instruments.
 - c. Mathematics and calculations basic to the use and measurement of radioactivity.
 - d. Biological effects of radiation.
17. EXPERIENCE. Attach a resume for each individual named in Items 6 and 7. Describe individual's work experience with radiation, including where experience was obtained. Work experience or on-the-job training should be commensurate with the proposed use. Include list of radioisotopes and maximum activity of each used.

18. CERTIFICATE

(This item must be completed by applicant)

The applicant and any official executing this certificate on behalf of the applicant named in Item 2, certify that this application is prepared in conformity with Title 10, Code of Federal Regulations, Part 30, and that all information contained herein, including any supplements attached hereto, is true and correct to the best of our 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.

<p>a. LICENSE FEE REQUIRED (See Section 170.31, 10 CFR 170)</p> <p>Amendment Fee \$60.00</p>	<p>b. CERTIFYING OFFICIAL (Signature)</p> <p>c. NAME (Type or print) Ronald G. Harper</p>
<p>(1) LICENSE FEE CATEGORY: 3P</p>	<p>d. TITLE Vice President</p>
<p>(2) LICENSE FEE ENCLOSED: \$ 60.00</p>	<p>e. DATE 3/19/87</p>

BRANDHURST CORPORATION

87 Sand Pit Road, Danbury, CT 06810
Telephone: (203) 798-1131 • Fax (203) 798-1574

SUPPLEMENT TO APPLICATION FOR AMENDMENT TO LICENSE NO. 06-20804-01

I Item 8E - Use of Licensed Material

Amend License:

- a) to change licensed premises to lower level, 87 Sand Pit Road, Danbury, CT 06810, as shown on attached drawing SK1
- b) item 6A from 12,5000 Curies to 60,000 curies possession limit for sealed sources installed in signs with a maximum of 30 curies per single source or device
- c) item 6A Physical Form to add BETALIGHT devices as follows:

<u>Type</u>	<u>Description</u>	<u>Min. Hydrogen 3</u>	<u>Max. Hydrogen 3</u>
Light, Aiming Post	Trilux, orange MOD Drawing OS2331GA	--	2.40 curies
Light Marker	Trilux, green MOD Drawing OS2347GA	---	1.93 curies
Lamp unit	Trilux, orange MOD Drawing OS5251A	---	2.40 curies
Personal Marker	White, SRDL Drawing D1234001L	---	.25 curie
Map Reader Assembly	SRL Drawing C1231001 through 5, 7, 10, 11, 13, 14	---	5.00 curies

<u>Type</u>	<u>Description</u>	<u>Min.Hydrogen 3</u> <u>per unit</u>	<u>Max.Hydrogen 3</u> <u>per unit</u>
Peglight ✓	Green betalight source	--	0.5 curie
Peglight ✓	Blue betalight source	--	2.0 curies
Peglight ✓	Orange betalight source	--	1.4 curies
Route Marker - I ✓	Single betalight source of the following colors, or a combination of the following colors: Green, Orange, Blue, Yellow or White	--	4.5 curies
Route Marker - II ✓	Single betalight source of the following colors, or a combination of the following colors: Green, Orange, Blue, Yellow, or White	--	4.5 curies
Light, Aiming Post ✓	Trilux, green MOD Drawing OS2330GA	--	1.93 curies
✓ Marker MP 107	Disc-shaped Betalight mounted by flexible silicone adhesive within a 3-part polycarbonate which is then protected by a rubber moulding	0.5 curie	5.0 curies
✓ Betalight Torch	Disc-shaped Betalight mounted by flexible silicone adhesive within a 2-part polycarbonate housing, which is clipped into rubber housing fitted with cap, steel-reinforced holding ring and lanyard	0.5 curie	5.0 curies

<u>Type</u>	<u>Description</u>	<u>Min.Hydrogren 3</u> <u>per unit</u>	<u>Max.Hydrogen 3</u> <u>per unit</u>
Box Sign 060✓	Box, 445 mm x 108 mm x 20.3 mm	--	12 curies
Box Sign 070✓	Box, 420 mm x 190 mm x 20.3 mm	--	20 curies
Box Sign 080✓	Box, 220 mm x 108 mm x 20.3 mm	--	10 curies
Box Sign 005✓	Size, 190.5 mm x 76.2 mm x 16 mm	--	5 curies
Box Sign 006✓	Size, 82.5 mm x 53.3 mm x 16 mm	--	6 curies
Box Sign 008✓	Size, 132.0 mm x 53.3 mm x 16 mm	--	4 curies
Box Sign 009✓	Size, 132.4 mm Top edge 95.3 mm Bottom edge 63.2 mm Height 16.0 mm Depth	--	3 curies
Box Sign 021✓	Size, 190.5 mm x 76.2 mm x 16 mm	--	9 curies
Box Sign 025✓	Size, 190.5 mm x 49.5 mm x 16 mm	--	5 curies
Safety Ten✓ Exit Sign	Beta light exit sign constructed in accordance with SRDI drawing no. 40113	--	21 curies
Beatlux-E ✓	Beta light exit sign, constructed in accordance with SRDI drawing No. 1633001-12	--	25 curies
Marker MP 182 ✓	Cylindrical Betalight sealed to reflector in hermetically sealed polycarbonate housing	0.25 curie	5.0 curies
Marker MP 166 ✓	Cylindrical Betalight embedded in transparent silicone rubber within moulded polycarbonate housing	0.20 curie	5.0 curies
Marker DB 145 ✓	Cylindrical Betalight mounted with flexible silicone adhesive and hermetically sealed in polycarbonate housing	0.10 curie	0.5 curie
Marker MP 152 ✓	Hemispherical Betalight mounted by flexible silicone adhesive within 3-part polycarbonate housing, which is then protected by a rubber moulding	0.10 curie	5.0 curies

Above products are manufactured by Saunders-Roe Developments Ltd., Millington Rd., Hayes Middlesex, England UB 3 4TB and/or Saunders-Roe Developments Inc., PO Box 5536, 2580 Landmark Drive, Winston-Salem, North Carolina 27113.

BRANDHURST CORPORATION

87 Sand Pit Road, Danbury, CT 06810
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III Item 13 - Facilities and Equipment

Amend facilities description as follows:

The warehouse facility and offices will be located on the ground floor of a two story industrial/commercial building located at 87 Sand Pit Road, Danbury, CT., 06810, and area zoned for industrial use. The warehouse will be equipped with intrusion alarms and fire detectors connected to a central monitoring station.

The facility will not contain any manufacturing operations. Only receiving, storage and shipping operations will be conducted.

Warehouse area will comprise a total of 900 square feet. Access to the warehouse and offices will be under the sole control of the Chief Operating Officer and/or the Brandhurst Radiation Protection Officer.

Fire protection is provided by the paid fire department of the City of Danbury.

The total volume of the warehouse area is 8000 cubic feet. A ventilation fan(s) will be installed to achieve 5 to 6 air changes per hour. Radiological protection analysis of this ventilation rate is addressed in the comments relative to Item 15 of the Application.

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I Item 8E - Use of Licensed Material (Cont'd)

(Amend License.)

- d) Item 6B Sealed Sources to add the following gaseous tritium light sources (Betalights):

<u>Type or Model No.</u>	<u>Configuration</u>	<u>Min. Activity per glass capsule</u>	<u>Max. Activity per glass capsule</u>
A.	Annular, both cylindrical and square or rectangular	0.05 curie	5.0 curies
B.	Radial, single pip.	0.05 curie	5.0 curies
F.	Axial, single pip.	0.05 curie	5.0 curies
M.H.	Cylindrical Laser cut end, no pip.	0.005 curie	0.7 curie
Q.	Special Shape, single pip.	0.5 curie	5.0 curies
R.H.	Square or rectangular Laser cut end. No pip.	0.003 curie	0.7 curie
R.	Rectangular, single pip.	0.05 curie	5.0 curies
S.	Sphere single pip.	0.05 curie	5.0 curies

- II Re Item 8D - Max Activity from 25 curies per device to a maximum of 30 curies per device.

All of the above products are presently licensed to Saunders-Roe Developments Inc., 2580 Landmark Drive, Winston Salem, North Carolina under North Carolina license No. 034-534-1 and are manufactured by Saunders-Roe Developments Ltd., Millington Rd., Hayes, Middlesex, England UB3 4NB.

BRANDHURST CORPORATION

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IV Item 15 - Radiation Protection Program

(A) Amend Estimate of Dose Rate to Non-Radiation Workers as Follows:

Condition

1) Normal Storage:

- a. Storage area gross volume 8000 ft.³
(Total tritium content per sign. 10 ci min to 25 ci max.)
- b. Maximum tritium inventory - 60,000 Ci.
- c. Maximum number of sealed sources in inventory:
45,000 sources (contained in 3000 signs)
- d. Tritium release per sealed source - .05 microcuries
in 24 hours maximum.
- e. Ventilation rate 5 changes/hour.
- f. Tritium oxide 2%.
- g. Residence time - 40 hours/week continuously for
one (1) year.
- h. Maximum allowable dose - .01 rem/year
as per 10 CFR 32.24 Column 11.
- i. Dose equivalent .17 rem/millicurie.
- j. Inhalation intake of standard man 10⁷ cc
in 8 hour day.

BRANDHURST CORPORATION

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Ref. Item 15
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The basic formula is:

Dose = Concentration x inhalation intake x dose
equivalent

$$\begin{aligned}\text{Concentration from 1 source} &= \frac{(\text{Oxide Content})(\text{Leak Rate})}{(\text{Room Volume})(\text{Ventilation Rate})} \\ &= \frac{(.02)(.05 \text{ uCi}/24 \text{ hrs.})}{(1.13 \times 10^8 \text{ cc})(5/\text{hr})} \\ &= \frac{12.48 \times 10^{-5} \text{ uCi}}{17 \times 10^8 \text{ cc}} \\ &= 7.2 \times 10^{-14} \text{ uCi/cc} \\ &= 7.2 \times 10^{-17} \text{ mCi/cc}\end{aligned}$$

$$\begin{aligned}\text{Dose from 1 source} &= (7.2 \times 10^{-17} \frac{\text{mCi}}{\text{cc}}) (\frac{10^7 \text{ cc}}{8 \text{ hrs.}}) (\frac{2080 \text{ hrs}}{\text{year}}) (.17 \text{ rem/mCi}) \\ &= .3 \times 10^{-7} \text{ rem/yr} \\ &= .03 \times 10^{-6} \text{ rem/yr}\end{aligned}$$

$$\text{Dose from 45,000 sources} = 1.35 \times 10^{-3} \text{ rem/yr.}$$

In excess of 300,000 light sources could be stored in the warehouse described above before the maximum allowable dose was reached.

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Ref. Item 15
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2) Breakage of Sign and Release of Tritium.

Due to the robust design of the sign (as confirmed by tests conducted in accordance with ANSI N540) and the fact that the signs contain a minimum of 10 and a maximum of 15 GTLS, it is extremely unlikely that all tubes in a sign will rupture simultaneously thereby releasing all tritium contained in the sign.

Therefore, the analysis set forth below assumes a single tube of maximum tritium content is broken, releasing the tritium into the same storage area as described in (1).

Tritium Released: 248 Ci. (Tube Type CT/60-65/140)

Oxide Content: 2%

Maximum Permissible Dose: .5 rem/year as per 10 CFR
32.24 Column III.

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Ref. Item 15
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Initial Concentration = $\frac{(\text{oxide content}) (\text{tritium released})}{\text{room volume}}$

$$= \frac{(.02 \quad 2.48 \quad \times 10^3 \text{ mCi})}{2.26 \times 10^8}$$
$$= \quad \times 10^{-5} \text{ mCi/cc}$$

Total Intake assuming no ventilation

= (concentration) (breath volume for standard man)

$$= (.021 \times 10^{-5} \text{ mCi/cc}) \frac{(10^7 \text{ cc})}{8 \text{ hrs.}}$$

$$= .267 \text{ mCi/hr.}$$

Now since the room containing the released tritium is being ventilated at a constant rate of 5 air changes per hour, we can assume that a constant fraction of tritium is removed per unit time.

The concentration can be expressed as an exponential function:

$$T_c = T_{co}^{-vt}$$

T_c = Tritium concentration at time t

T_{co} = Initial Tritium concentration (t=0)

v = Ventilation Rate (air changes/hr.)

t = Time after release (hrs.)

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This expression enables a Mean Residence Time for tritium in the room to be established, and this is equal to

$$\int_0^{\infty} e^{-vt} dt = \frac{1}{v} \quad \left| \quad e^{-vt} \quad \left| \quad \begin{array}{l} t = \infty \\ t = 0 \end{array} \right. \right.$$
$$= \frac{1}{v}$$

Thus with 5 air changes per hour, the mean residence time is .2 hour.

Therefore,

$$\begin{aligned} \text{Total Intake} &= .267 \text{ mCi/hr} \times .2 \text{ hr.} \\ &= .053 \text{ mCi} \end{aligned}$$

Using the Dose Equivalent for 40 hour residence:

$$\begin{aligned} \text{Total Dose} &= (\text{Dose Equivalent}) (\text{Total Intake}) \\ &= .17 \text{ rem/mCi} \times .053 \text{ mCi} \\ &= .009 \text{ rem per year.} \end{aligned}$$

The above Total Dose is one fifty-fifth (1/55) the level of .5 rem/year given in Column III of the table in 10CFR32.24 as specified in 10CFR32.23 (d).

From the above calculation, it is shown that in excess of 20 complete breakages of an entire sign per year could occur under the conservative room conditions considered, before the limits of 10CFR32.24 were reached. The possibility of such a breakage rate is extremely remote.

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BETWEEN: C. James Holloway, Chief
License Fee Management Branch
Office of Resource Management

John E. Glenn, Chief
Nuclear Materials Safety & Safeguards Section B
Division of Radiation Safety and Safeguards

LICENSE FEE TRANSMITTAL

A. REGION I

1. APPLICATION ATTACHED

Applicant/Licensee: Brandhurst Corp.
Application Dated: 3-19-87
Control No.: 107012
License No.: 06-20804-01

2. FEE ATTACHED

Amount: \$60
Check No.: 090

3. COMMENTS

Signed SLJ
Date 3-26-87

B. LICENSE FEE MANAGEMENT BRANCH

1. Fee Category and Amount: 3P Import/Distribution \$60

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

Amendment ✓
Renewal _____
License _____

Signed S. Kimberley
Date 3/31/87