

27 APR 1988

License No. 06-19068-01  
Docket No. 030-16018  
Control No. 108623

ICI Americas, Inc.  
ATTN: Robert F. Potrepka, Ph.D.  
Radiation Protection Officer  
Environmental Health Center  
400 Farmington Avenue  
Farmington, CT 06032

Gentlemen:

This is in reference to your request in a letter dated March 21, 1988 to amend license no. 06-19068-01. In order to continue our review, we need the following additional information:

1. In your letter, you request an amendment to change your name from Stauffer Chemical Company to ICI Americas, Incorporated. The following information is needed for the NRC to determine if there is a change-of-name or a change-of-ownership:
  - a. The mailing address of the licensee.
  - b. List all changes in organization, facilities, equipment or personnel.
  - c. Will be selling or otherwise giving up control of a licensed operation and remain in business with or without using licensed material?
  - d. Is the transfer accomplished by purchase of assets or by purchase of stock?
  - e. Affirm that ICI Americas, Incorporated agrees to abide by all commitments and representations previously made to the NRC by Stauffer Chemical Company.
  - f. Affirm that buyer and seller agree to the transfer.

We will continue our review of your change-of-name upon receipt of the above information. If a licensed company is purchased and the seller will not continue in business as a separate entity, the purchase can be approved as a straightforward name change. However, if a licensed operation is purchased from a seller who continues in business as a separate entity without using licensed material, then, the buyer must submit a complete new license application and obtain a new license, even if the licensed facilities and personnel do not change.

2. For each of the requested additions to the list of authorized users on your license, please provide greater detail regarding the length and details of the formal training and working experience of your proposed

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- user and the specify quantities and isotopes for which these individuals should be licensed. The description of the working experience should include the quantities and isotopes previously used.
3. In support of your request for ten millicuries of phosphorus-32, you should develop and submit special safety instructions to be provided to individuals using millicurie quantities of P-32. It is recommended that your procedures include, but not limited to, the following:
- The use of low density shielding (e.g., 1/2" thick Plexiglas) in order to keep Bremsstrahlung radiation at a minimum.
  - A mandatory radiation survey and wipe test procedure after each use.
  - The use of finger type extremity monitors for procedures that involve 1 millicurie or more.
  - The use of dry run prior to the performance of unfamiliar procedures in order to preclude unexpected complications. In addition, it is recommended that the radiation protection officer be present during new procedures.
  - The use of eye protection for procedures that involve 10 millicuries of more.

If we do not receive a reply from you within 30 calendar days from the date of this letter, we shall assume that you do not wish to pursue your application.

Sincerely,

**Original Signed By:**  
**Francis M. Costello**

Francis M. Costello  
Nuclear Materials Safety Section A  
Division of Radiation Safety  
and Safeguards

*FMC*  
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