MAR 17 1987

Docket No. : 030-06981
License No.: 27-05861-02
Control No.: 70530

Environmental Protection Agency
Environmental Monitoring Systems Laboratory
P. O. Box 15027
Las Vegas, Nevada 89114-5027

Attention: Mr. Robert Dye
Radiation Safety Officer

Gentlemen:

This is in reference to your request dated February 18, 1987 for renewal of your byproduct material license, and to our letter to you dated April 15, 1986, copy enclosed.

In our April 15, 1986 letter, we requested you to submit a complete renewal application which does not refer to other documents. The license as it now stands refers to documents dated from 1968. It is not clear which procedures are current and which are outdated. For this reason, you are now requested to resubmit your renewal request. You should submit a complete description of licensed activities which does not refer to other documents. Your submittal should include:

1. A description of the facilities currently in use for activities conducted under this license (See Item 13 of Regulatory Guide 10.7 [RG 10.7]).

2. A more complete description of the licensed materials used and the activities conducted under this license. In particular:

   a. You should itemize the amounts of I-125, I-129, I-131, and C-14 to be used under this license. Note that a Radiological Contingency Plan will be needed if you exceed the limits specified in NUREG-0767, copy enclosed. If you exceed the limits, submit your Contingency Plan, as well.

   b. Specify that no licensed materials are released to the environment
   OR
   Submit the information described in the enclosed sheet regarding field use of byproduct material. Refer to 10 CFR Part 51, copy enclosed.

   c. Describe your well-logging operations. Discuss the conditions under which well logging operations may be performed. Refer to the Proposed 10 CFR Part 39, copy enclosed.

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d. Describe your procedures for transferring laboratory intercomparison samples between laboratories. Describe the types of materials transferred to other broad-scope or specific licenses. Describe the materials which may be transferred to laboratories without specific licenses. Reference the sections of 10 CFR which allow such transfers.

e. Describe your procedures for transporting, securing, and using sealed sources at temporary job sites for demonstration or training purposes.

f. Describe your procedures and criteria for conducting the safety evaluations for approving users and research protocols. Refer to Item 10.4.2 (page 15) of Proposed Revision 2 to RG 10.5.

3. You should describe the formal training and work experience with radioactive materials and radiation safety of each member of your Radiation Safety Committee. Refer to Item 7.2 of Proposed Rev. 2 to RG 10.5.

4. Describe your routine audit procedure. Indicate who will be responsible for conducting the audits, describe how they will be performed, and specify the maximum time-interval between these audits. Refer to Items 10.2 and 10.3 of Proposed Revision 2 to RG 10.5.

5. Regarding your Radiation Safety Officer (RSO):

a. Indicate whether the RSO position is a full-time assignment

b. Indicate who the RSO reports to in top management

c. List the responsibilities and duties of the RSO

Refer to Item 10.3 of Proposed Rev. 2 to RG 10.5.

6. With regard to radiation safety procedures, you should submit the following information:

a. The current Radiation Safety Manual (Refer to Item 15d. of RG 10.7)

b. The suppliers, types (TLDs, film badges), and exchange frequencies (at least monthly for film badges and quarterly for TLDs) of personnel dosimetry

c. The criteria which will be used to determine when bioassays are required, what the frequencies of the bioassays will be, and what instrumentation will be used to conduct these bioassays. Refer to RG 8.20, NUREG-0938, and the "Applications of Bioassay for Tritium"

d. The routine radiation level and contamination-wipe procedures. Identify which surveys will be conducted by the RSO and which will be conducted by the authorized users. Refer to Item 10.3 of the Proposed Rev. 2 to RG 10.5 and to Item 15 of RG 10.7.

e. The radiation survey instrumentation that is available on site, as well as calibration procedures and frequencies. Refer to Items 10. and 11 of RG 10.7.

We will continue the review of your renewal request upon receipt of this information. In order to continue prompt review of your application, we request that you submit your response to this letter within 30 calendar days from the date of this letter. Please reply in duplicate, and refer to Mail Control No. 70530.

Sincerely,

Beth A. Riedlinger
Health Physicist (Licensing)
Nuclear Materials Safety Section

Enclosures:
Letter dated April 15, 1986
RG 10.7, RG 10.5, (Proposed Rev.2), RG 8.20
NUREGS 0767, 0762, 0810, 0938
Proposed 10 CFR Part 39, Part 51
"Information Required to License Field Use of Byproduct Material"
"Applications of Bioassay for Tritium"