

UNITED STATES NUCLEAR REGULATORY COMMISSION WASHINGTON, D.C. 20555-0001

07/14/2021

TO:

Users of Devices Subject to General License Registration

SUBJECT: ANNUAL REGISTRATION OF GENERALLY LICENSED DEVICES

The U.S. Nuclear Regulatory Commission (NRC) requires annual registration of certain devices that are possessed under the general license issued in Section 31.5 of Title 10 U.S. Code of Federal Regulations (10 CFR 31.5). Devices subject to registration include those containing the radioactive material and activity listed in Table 1 of the attached NRC Form 664.

NOTE: You are receiving this notice because NRC records indicate that you have one or more such devices, however, you did not return your completed registration for 2020 as required. The NRC realizes that mail delivery was not as efficient during the pandemic and mail may not have reached the intended recipient in 2020, therefore, we are resending your registration. The enclosed registration will cover both 2020 and 2021 annual registrations. If you no longer have the devices, please update your registration form so we can update our system. If you do have one or more of the devices, please update any incorrect information.

Information about the general license registration program is available NRC website at http://www.nrc.gov/materials/miau/miau-reg-initiatives/gen-license.html. Note that under 10 CFR 31.5(c)(11), the attached General Licensee Registration Package must be completed, signed, and returned to the NRC within 30 days from the date of this letter. Read all of the instructions prior to completing the package. Mail the completed package in the enclosed envelope to:

Director, Office of Nuclear Material Safety and Safeguards ATTN: Document Control Desk/GLTS U.S. Nuclear Regulatory Commission Washington DC 20555-0001

Registration Fee: Commission regulations (10 CFR 170.31, Category 3Q) require that you submit a registration fee with each registration on an annual basis. An invoice for the current amount due will be sent to you under separate cover. If you have any questions about the fee or the invoice, please contact the License Fee Billing Help Desk at (301) 415-7554 or e-mail at fees.resource@nrc.gov.

NRC amended 10 CFR Parts 170.11 and 170.31 to provide that 10 CFR Part 170 fees be assessed to Federal agencies, where applicable, in accordance with the Energy Policy Act of 2005. Therefore, those Federal facilities required to register certain generally licensed devices in their possession will be required to pay the annual registration fee.

Attachment: NRC Form 664 -- General Licensee Registration and Instructions

Sincerely,

U.S. Nuclear Regulatory Commission Office of Nuclear Material Safety and Safeguards Division of Materials Safety, Security, State, and Tribal Programs Materials Safety and Tribal Liaison Branch

INSTRUCTIONS FOR COMPLETING NRC FORM 664 "GENERAL LICENSEE REGISTRATION"

Review all six sections of this registration form. If any information is incorrect or missing, make corrections in the applicable boxes. If you have more devices than space provided in the form, copy the form before starting, as needed. Use black ink and print in CAPITAL LETTERS. Start information in the first box provided. If the information contains a number with a dash (-) or a decimal point (.), include the dash or decimal point as an individual character. Use the "ø" character to represent the number 0 (zero).

Verify information about the devices by reviewing the label on the <u>outside</u> of the device. For safety reasons, DO NOT TRY TO TAKE APART any device to verify this information. If you are uncertain how to identify the device's label, contact the device's manufacturer or an authorized service agent for this information. Also, contact the manufacturer for any additional information about NRC requirements. You may also review 10 CFR 31.5 and other applicable regulations on the NRC web site at http://www.nrc.gov/reading-rm/doc-collections/cfr/, or review specific information about the general licensee project at http://www.nrc.gov/materials/miau/miau-reg-initiatives/gen-license.html

Note to specific licensees: If you believe the device(s) listed on the registration form are possessed under your specific license, then verify the device label does not state the device is subject to a general license. If the labels indicate the device is subject to a general license, then complete the registration form as instructed below. If not, complete the registration as instructed below, however, in Section 2, follow the instructions for "not in possession of device" and complete one Section 4 page per device transferred to your specific license.

Section 1 - General Licensee Information. Provide the requested information about you, the general licensee.

On Page 1, provide the street address/location where your device(s) are used. For portable devices, provide the storage location. P.O. Box addresses are not allowed.

Do not write in the box marked For NRC Use Only.

On Page 2, provide the name, business telephone number, and title of the individual responsible for your device(s), and a mailing address where correspondence about your device(s) can be sent. The mailing address should be specific to the physical location where the devices are used and/or stored (P.O. boxes may be used if this is the only available mailing address). The individual indicated in this section as responsible for your device(s) must also verify and sign the form in Section 5.

Section 2 - Devices Subject to Registration. This section lists each device subject to registration and in your possession, according to NRC records. Devices subject to registration include those containing at least one of the radionuclides listed in Table 1, with the activity indicated, at the time of manufacture.

Table 1. Criteria for Registration

Table 1. Citteria for Regis	tration
Radionuclide	Activity greater than or equal to:
Strontium-90, Radium-226	3.7 megabecquerel (0.1 millicurie)
Cobalt-60, Curium-244, Americium-241, and Californium-252	37 megabecquerel (1 millicurie)
Cesium-137	370 megabecquerel (10 millicurie)

Use the codes from Table 2 when correcting isotope information for devices in this section. If you do not possess a device on this list, blacken the "not in possession of device" circle, and provide the relevant information in Section 4. Note that each device is assigned a unique six-digit number called the NRC Device Key.

Table 2. Isotope Codes for Sections 2 and 3

Radionuclide	Code for form	Radionuclide	Code for form
Americium-241	AM241	Curium-244	CM244
Californium-252	CF252	Strontium-90	SR90
Cesium-137	CS137	Radium-226	RA226
Cobalt-60	CO60		

Section 3 - Additional Devices. If you have other generally licensed devices (not listed in Section 2) that meet the conditions for registration listed in Table 1, provide information about each additional device. Before starting, copy this section as needed for your additional devices. Also indicate how you acquired each device by blackening the proper circle.

When entering isotope and unit information for your device(s), use the codes listed in Table 2 of Section 2 for isotope information, and use the codes from Table 3 for unit information:

Table 3. Unit Codes for Section 3

Unit	Code for form	Unit	Code for form
picocurie	PCI	becquerel	BQ
nanocurie	NCI	kilobecquerel	KBQ
microcurie	UCI	megabecquerel	MBQ
millicurie	MCI	gigabecquerel	GBQ
curie	CI	terabecquerel	TBQ
	I.B.	microgram	UG
pound	LB	milligram	MG
kilogram	KG	gram	G

Section 4 - Not in Possession of Device. Use this section to report any devices that are listed in Sections 2 or 6, but that you no longer possess. Before starting, copy this section as needed for additional devices that are not in your possession. Enter the NRC Device Key, as listed in Section 2 or 6. Blacken the circle (choose only one) that best describes the disposition of the device and complete the rest of the section as appropriate.

Section 5 - Certification and Signature. The responsible individual must certify, sign, and date Section 5.

Section 6 - Devices Not Subject to Registration. This list contains information about devices that NRC records indicate are in your possession, but are not subject to registration. If you no longer have one or more of the listed devices, you are required to make a transfer report to NRC in accordance with 10 CFR 31.5(c)(8) or (9), as applicable. You may use Section 4 for this purpose. This section does not list any static eliminators containing polonium-210 (Po-210), or luminous exit signs containing tritium (H-3). These devices are not subject to registration, and are not included in this section in an effort to reduce the length of this form.

RETURN THE COMPLETED FORM IN THE ENCLOSED LARGE ENVELOPE WITH PROPER POSTAGE.



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NRC FORM 664

(11 - 2020)10 CFR 31.5



SECTION 1 PAGE 1 of 2

U.S. NUCLEAR REGULATORY COMMISSION

GENERAL LICENSEE REGISTRATION

OMB EXPIRATION DATE: 09/30/2022

Estimated burden per response to comply with this mandatory collection request: 20 minutes. NRC will use this information to track general licensees and their devices to APPROVED BY OMB: NO. 3150-0198 ensure a higher level of device accountability. Send comments regarding burden estimate to the FOIA, Library, and Information Collections Branch (T-6 A10M), U. S. Nuclea ensure a higher level of device accountability. Send comments regarding burden estimate to the FOIA, Library, and Information Collections Branch (T-6 A10M), U. S. Nuclea ensure a higher level of device accountability. Send comments regarding burden estimate to the FOIA, Library, and Information Collections Branch (T-6 A10M), U. S. Nuclea ensure a higher level of device accountability. Send comments regarding burden estimate to the FOIA, Library, and Information Collections Branch (T-6 A10M), U. S. Nuclea ensure a higher level of device accountability. Send comments regarding burden estimate to the FOIA, Library, and Information Collections Branch (T-6 A10M), U. S. Nuclea ensure a higher level of device accountability. Send comments regarding burden estimate to the FOIA, Library, and Information Collections Branch (T-6 A10M), U. S. Nuclea ensure a higher level of device accountability. Send comments regarding burden estimate to the FOIA, Library, and Information Collections Branch (T-6 A10M), U. S. Nuclea ensure a higher level of device accountability. Send comments regarding burden estimate to the FOIA, Library, and Information Collections Branch (T-6 A10M), U. S. Nuclea ensure a higher level of device accountability. Send comments regarding burden estimate to the FOIA, Library, and Information Collections Branch (T-6 A10M), U. S. Nuclea ensure a higher level of device accountability. Send comments regarding burden estimate to the FOIA, Library, and Information Collections Branch (T-6 A10M), U. S. Nuclea ensure a higher level of device accountability. Send comments regarding burden estimate to the FOIA, Library, and Information Collections Branch (T-6 A10M), U. S. Nuclea ensure a higher level of the send of the sen NRC may not conduct or sponsor, and a person is not required to respond to, a collection of information unless the document requesting or requiring the collection displays currently valid OMB control number.

Complete all six sections of this registration form. If any of the preprinted information is incorrect, provide the changes in the applicable boxes. USE CAPITAL LETTERS.

General License Registration Number

GL-728723-26

SECTION 1 - GENERAL LICENSEE INFORMATION

Enter the company name and the street address for the physical location of use for your device(s). For portable devices, specify the primary storage location. Do not use P.O. Boxes.

								Acces	ssion	Numbe	er:		
	For NRC Use Only (Do not write here)					Category: Packet Receipt Date (MMDDYYYY):							
State: PR		z	ip Cod	e: 006	53					_			
, ity.													
city:	GUANI	CA											_
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mpany Name:			TI										







SECTION 1 PAGE 2 of 2

SECTION 1 - GENERAL LICENSEE INFORMATION (Continued)

Enter the name, telephone number and title of the person who is the responsible individual for the device(s).

Last Name: MARTIN
SUMNER
First Name: MARIA: Middle Initial:
MICHAEL
954 655 965 621421 Extension: 954 655 965 7 (Cell)
Business E-mail Address:
dsumner@phearmor.com
Title: CURRENT SAFETY OFFICER
Enter the mailing address where correspondence regarding your device(s) should be sent. Department:
au ALITY
Address Line 1: CARR 332 LM 0.4
2102SWZVDSTREET
Address Line 2: LOTTE #3
City: GUANICA
POMPANOBEACH
State: -PR F L Zip Code: 99653 3 3 6 6 9 -





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SECTION 2 - DEVICES SUBJECT TO REGISTRATION

SECTION 2 PAGE 1 of 4

Our records indicate that you have these devices. Please update the information as necessary.

	Device Key			A TANAN CANADA		ntrol N	lumb	er)							
Distrib	utor/Distributed	By: Elena	Researc	h, LLC					_	_		_			
Distrib	utor License Nu	ımber: 434	0-1												
Manuf	facturer name:	ADAPTI	VE TECH	INOLO	GIES	INDUS	TRIE	S							
П															
Devic	e Model (Not So	ource Model)	: AT-100	s											
	ineacron		T												
David	e Serial Numbe	r: 30165													
Devic	e Seriai Numbe	1. 30103					T						T		
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Trans	efer Date: 07/	18/2019									Not in	posse lete Se	ssion ction	of devi	ice (Also
М	M DD	YYY	Υ							Well page					
	Isotope (e.g. Al	M241)	,	Activity	(e.g. 1	1005)									Unit (e.g. mCi)
	SR90			0.5				_					\neg		mCi
2									_	1					
3					_			1	1	T					
4						T				T					
_															
5						1 1	T								



6





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SECTION 2 - DEVICES SUBJECT TO REGISTRATION

SECTION 2 PAGE 2 of 4

Our records indicate that you have these devices. Please update the information as necessary.

	Device Key outor/Distributed By: El	854610 ena Resear	(Internal Control Number) rch, LLC	
		TIT		
	- tar License Number:	4340-1		
Distri	outor License Number:	1010		
		DTI) /F TEC	CHNOLOGIES INDUSTRIES	
Manı	ıfacturer name: ADA	PIVETEC	SANOEOGIES INSCRIMENT	
Devi	ce Model (Not Source Mo	del): AT-10	008	
Dev	ce Serial Number: 30	166		
	nsfer Date: 07/18/2019	YYYY	Not in possession of device (Also complete Section 4.)	
	Isotope (e.g. AM241)		Activity (e.g. 1005) MCi)i)
1	SR90		0.5	
2				
3				
4				
5				
6				





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SECTION 2 - DEVICES SUBJECT TO REGISTRATION

SECTION 2

Our records indicate that you have these devices. Please update the information as necessary.

PAGE 3 of 4

NRC Device Key Distributor/Distributed By: Ele	ena Research, LLC	
istributor/biotributou by:		
istributor License Number: 4	1340-1	
lanufacturer name: ADAF	PTIVE TECHNOLOGIES INDUSTRIES	
evice Model (Not Source Mod	el): AT-100S	
evice Serial Number: 3016	57	
MM DD YY Isotope (e.g. AM241)	Activity (e.g. 1005)	Unit (e.g. mCi)
SR90	0.5	mCi
3		
4		
5		
6		





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SECTION 2 - DEVICES SUBJECT TO REGISTRATION

SECTION 2

Our records indicate that you have these devices. Please update the information as necessary.

PAGE 4 of 4

		Research, LL0	rnal Control	Number)		
JISU	ibutor/bistributed by. Liona	TROSCATOLI, EE			T	
Distr	ributor License Number: 4340	0-1				
Vlan	nufacturer name: ADAPTIV	/E TECHNOLO	OGIES INDU	STRIES		
Dev	rice Model (Not Source Model):	AT-100S				
Dev	vice Serial Number: 30168					
N	MM DD YYYY Isotope (e.g. AM241)	The second of the second	/ (e.g. 1005)			Unit (e.g. mCi)
1	SR90	0.5				mCi
2						
3						
3						





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SECTION 3 - ADDITIONAL DEVICES SUBJECT TO REGISTRATION

SECTION 3 PAGE 1 of 1

Provide information about other devices you have that are subject to registration. Do not report specifically licensed devices. Manufacturer Name Initial Transferor Name Initial Transferor License Number (if known) Device Model Number (Not Source Model) **Device Serial Number** Manufacturer/Initial Transferor listed above How acquired and date (e.g., Date Transferred: from a distributor/manufacturer, Other General Licensee other licensee, other source)? DD YYYY MM O Other Sources Unit (e.g. mCi) Activity (e.g. 100) Isotope (e.g. AM241) 1. 2. 3. 4. 5. 6. 7. 8. 9. 10.





SECTION 4 - NOT IN POSSESSION OF DEVICE 08/05/2021

SECTION 4 PAGE 1 of 1

Provide information about devices listed in Section 2 or 6, but no longer in your possession. Transfer Date: Part 1 N

	Device																		
rom	Section	2 or 6)							MN		DD		YY	YY		70 m			
ocati	ion of th	ne Device	e:														_		-1.0\
				Complete				0.	Transfe	erred t	to anoth	ner ger	neral li	cens	ee (C	omple	te Pa	rts 2 a	and 3)
0	Never I	Possesse	d the De	evice (Cor	nplete	Part 1	only)	0	Transfo (Comp	erred i	to a Speart 2)	ecitic L	icense	e (IV	iot the	manu	IIaGlu	ilei)	
0	Return	ed to Mar	nufacture	er (Comple	ete Par	t 1 on	ly)		(COIIIP	icto i	uit 2)								
Part	2 1	License N	Number	of Recipi	ent (if t	transf	erred t	o a spe	ecific li	cense	ee):								
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Com	pany N	ame:																-	
									-									112.1	
Depa	artment												1 1				T	_	
Add	ress Lin	no 1·							0,										
Addi	CSS LIII	ic i.					1 1		1								-	1	
Add	ress Lir	ne 2:		100															
										1							-	1	
City	:												_				_	_	_
			TI																
			7in	Cada		+	+			+									
Stat	te:		Zip	Code:															
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	le:											_		_	1				1



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SECTION 5 - CERTIFICATION



SECTION 5 PAGE 1 of 1

I hereby certify that:

- A. All information contained in this registration is true and complete to the best of my knowledge and belief.
- B. A physical inventory of the devices subject to registration has been completed, and the device information on this form has been checked against the device labeling.
- I am aware of the requirements of the general license, provided in 10 CFR 31.5.
 (Copies of applicable regulations may be viewed at the NRC website at: http://www.nrc.gov/reading-rm/doc-collections/cfr)

Summe 9/20/21

SIGNATURE - RESPONSIBLE INDIVIDUAL (Listed in Section 1)

DATE

WARNING: FALSE STATEMENTS MAY BE SUBJECT TO CIVIL AND/OR CRIMINAL PENALTIES. NRC REGULATIONS REQUIRE THAT SUBMISSIONS TO THE NRC BE COMPLETE AND ACCURATE IN ALL MATERIAL ASPECTS. 18 U.S.C SECTION 1001 MAKES IT A CRIMINAL OFFENSE TO MAKE A WILLFULLY WRONG STATEMENT OR REPRESENTATION TO ANY DEPARTMENT OR AGENCY OF THE UNITED STATES AS TO ANY MATTER IN ITS JURISDICTION.





SECTION 6 - DEVICE NOT SUBJECT TO REGISTRATION



SECTION 6 PAGE 1 of 1

NRC Device Key:

Manufacturer License No:

Manufacturer Name:

Model Number:

Serial #: Activity: Transfer Date:

Isotope:

Unit: