

Marshall Lab Service

PO Box 130

Marshall, MO 65340

660-886-9688 • office@hahnphillipsgrease.com

May 26, 2022

Reference Mail Control #629476

Dear Mr. Tran,

I have corrected our application regarding Section II, 'Waste Management'.

Thank You,



Lisa Gray

Lab Manager

660-886-9688

office@hahnphillipsgrease.com

RECEIVED MAY 26 2022

NRC FORM 313  
(01-2020)  
10 CFR 30, 32,  
33, 34, 35, 36,  
37, 38, and 40

U.S. NUCLEAR REGULATORY COMMISSION



### APPLICATION FOR MATERIALS LICENSE

APPROVED BY OMB: NO. 3160-0120

EXPIRES: 01/31/2023

Estimated burden per response to comply with this mandatory collection request: 4.3 hours. Submittal of the application is necessary to determine that the applicant is qualified and that adequate procedures exist to protect the public health and safety. Send comments regarding burden estimate to the Information Services Branch (T-8 A104), U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001, or by e-mail to [InfoCollect.Resource@nrc.gov](mailto:InfoCollect.Resource@nrc.gov), and to the Desk Officer, Office of Information and Regulatory Affairs, NE08-10202, (3150-0120), Office of Management and Budget, Washington, DC 20503. If a means used to impose an information collection does not display a currently valid OMB control number, the NRC may not conduct or sponsor, and a person is not required to respond to, the information collection.

INSTRUCTIONS: SEE THE CURRENT VOLUMES OF THE NUREG-1696 TECHNICAL REPORT SERIES ("CONSOLIDATED GUIDANCE ABOUT MATERIALS LICENSES") FOR DETAILED INSTRUCTIONS FOR COMPLETING THIS FORM: <https://www.nrc.gov/reading-rm/doc-collections/nuregs/staff/sr1696/>. SEND TWO COPIES OF THE COMPLETED APPLICATION TO THE NRC OFFICE SPECIFIED BELOW.

**APPLICATION FOR DISTRIBUTION OF EXEMPT PRODUCTS FILE APPLICATIONS WITH:**

MATERIALS SAFETY LICENSING BRANCH  
DIVISION OF MATERIAL SAFETY, STATE, TRIBAL AND RULEMAKING PROGRAMS  
OFFICE OF NUCLEAR MATERIALS SAFETY AND SAFEGUARDS  
U.S. NUCLEAR REGULATORY COMMISSION  
WASHINGTON, DC 20555-0001

**ALL OTHER PERSONS FILE APPLICATIONS AS FOLLOWS:**

**IF YOU ARE LOCATED IN:**

ALABAMA, CONNECTICUT, DELAWARE, DISTRICT OF COLUMBIA, FLORIDA, GEORGIA, KENTUCKY, MAINE, MARYLAND, MASSACHUSETTS, NEW HAMPSHIRE, NEW JERSEY, NEW YORK, NORTH CAROLINA, PENNSYLVANIA, PUERTO RICO, RHODE ISLAND, SOUTH CAROLINA, TENNESSEE, VERMONT, VIRGINIA, VIRGIN ISLANDS, OR WEST VIRGINIA,

**SEND APPLICATIONS TO:**

LICENSING ASSISTANT TEAM  
DIVISION OF NUCLEAR MATERIALS SAFETY  
U.S. NUCLEAR REGULATORY COMMISSION, REGION I  
2100 RENAISSANCE BOULEVARD, SUITE 100  
KING OF PRUSSIA, PA 19406-2713

**IF YOU ARE LOCATED IN:**

ILLINOIS, INDIANA, IOWA, MICHIGAN, MINNESOTA, MISSOURI, OHIO, OR WISCONSIN, SEND APPLICATIONS TO:

MATERIALS LICENSING BRANCH  
U.S. NUCLEAR REGULATORY COMMISSION, REGION III  
2443 WARRENVILLE ROAD, SUITE 210  
Lisle, IL 60532-4352

**IF YOU ARE LOCATED IN:**

ALASKA, ARIZONA, ARKANSAS, CALIFORNIA, COLORADO, HAWAII, IDAHO, KANSAS, LOUISIANA, MISSISSIPPI, MONTANA, NEBRASKA, NEVADA, NEW MEXICO, NORTH DAKOTA, OKLAHOMA, OREGON, PACIFIC TRUST TERRITORIES, SOUTH DAKOTA, TEXAS, UTAH, WASHINGTON, OR WYOMING,

**SEND APPLICATIONS TO:**

NUCLEAR MATERIALS LICENSING BRANCH  
U.S. NUCLEAR REGULATORY COMMISSION, REGION IV  
1600 E. LAMAR BOULEVARD  
ARLINGTON, TX 76011-4511

PERSONS LOCATED IN AGREEMENT STATES SEND APPLICATIONS TO THE U.S. NUCLEAR REGULATORY COMMISSION ONLY IF THEY WISH TO POSSESS AND USE LICENSED MATERIAL IN STATES SUBJECT TO U.S. NUCLEAR REGULATORY COMMISSION JURISDICTIONS.

**1. THIS IS AN APPLICATION FOR (Check appropriate item)**

- A. NEW LICENSE
- B. AMENDMENT TO LICENSE NUMBER
- C. RENEWAL OF LICENSE NUMBER

24-20003-01

**2. NAME AND MAILING ADDRESS OF APPLICANT (Include zip code)**

Marshall Lab Service  
P.O. Box 130  
Marshall MO 65340

**3. ADDRESS WHERE LICENSED MATERIALS WILL BE USED OR POSSESSED**

913 N. Odell Ave  
Marshall MO 65340

**4. NAME OF PERSON TO BE CONTACTED ABOUT THIS APPLICATION**

Lisa Gray (Wade)

**BUSINESS TELEPHONE NUMBER**

660 886-9688

**BUSINESS CELLULAR TELEPHONE NUMBER**

**BUSINESS E-MAIL ADDRESS**

office@ahn.phillipsgrase.com

SUBMIT ITEMS 6 THROUGH 11 ON 8-1/2 X 11" PAPER. THE TYPE AND SCOPE OF INFORMATION TO BE PROVIDED IS DESCRIBED IN THE LICENSE APPLICATION GUIDE.

**6. RADIOACTIVE MATERIAL**

a. Element and mass number; b. chemical and/or physical form; and c. maximum amount which will be possessed at any one time.

**8. PURPOSE(S) FOR WHICH LICENSED MATERIAL WILL BE USED.**

**7. INDIVIDUAL(S) RESPONSIBLE FOR RADIATION SAFETY PROGRAM AND THEIR TRAINING AND EXPERIENCE.**

**8. TRAINING FOR INDIVIDUALS WORKING IN OR FREQUENTING RESTRICTED AREAS.**

**9. FACILITIES AND EQUIPMENT.**

**10. RADIATION SAFETY PROGRAM.**

**11. WASTE MANAGEMENT.**

**12. LICENSE FEES (Fees are required only for new applications, with few exceptions) (See 10 CFR 170 and 170.37)**

\*Amendments/Renewals that increase the scope of the existing license to a new or higher fee category will require a fee.

FEE CATEGORY

AMOUNT ENCL. USED \$

PER THE DEBT COLLECTION IMPROVEMENT ACT OF 1996 (PUBLIC LAW 104-134), YOU ARE REQUIRED TO PROVIDE YOUR TAXPAYER IDENTIFICATION NUMBER. PROVIDE THIS INFORMATION BY COMPLETING NRC FORM 631: <https://www.nrc.gov/reading-rm/doc-collections/forms/nrc631info.html>

**13. CERTIFICATION. (Must be completed by applicant) THE APPLICANT UNDERSTANDS THAT ALL STATEMENTS AND REPRESENTATIONS MADE IN THIS APPLICATION ARE BINDING UPON THE APPLICANT.**

THE APPLICANT AND ANY OFFICIAL EXECUTING THIS CERTIFICATION ON BEHALF OF THE APPLICANT, NAMED IN ITEM 2, CERTIFY THAT THIS APPLICATION IS PREPARED IN CONFORMITY WITH TITLE 10, CODE OF FEDERAL REGULATIONS, PARTS 30, 32, 33, 34, 35, 36, 37, 39, AND 40, AND THAT ALL INFORMATION CONTAINED HEREIN IS TRUE AND CORRECT TO THE BEST OF THEIR KNOWLEDGE AND BELIEF.

WARNING: 18 U.S.C. SECTION 1001 ACT OF JUNE 28, 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.

**CERTIFYING OFFICER - TYPED/PRINTED NAME AND TITLE**

Lisa Wade Gray

**SIGNATURE**

Lisa Wade Gray

**DATE**

12/6/2021

FOR NRC USE ONLY

C.5

Yes	No	Radionuclide	Manufacturer and Model No.	Quantity (activity per source, number of sources in device, and maximum number of sources)	Purpose of Use	Specify Other Uses Not Listed on SSD Certificate
	X	Hydrogen-3 <sup>1</sup>				<input type="checkbox"/> Not applicable <input type="checkbox"/> Uses are:
	X	Iron-55				<input type="checkbox"/> Not applicable <input type="checkbox"/> Uses are:
	X	Cobalt-57	Valco Instruments CO.		Gas Chromatograph	<input type="checkbox"/> Not applicable <input type="checkbox"/> Uses are:
X		Nickel-63	Foil source contained in PerkinElmer ECO #330-0119	2 cells not to exceed 10 microcuries each	Gas Chromatograph for Sample Analysis	<input type="checkbox"/> Not applicable <input type="checkbox"/> Uses are:
	X	Americium-241				<input type="checkbox"/> Not applicable <input type="checkbox"/> Uses are:
		Other (specify)				

<sup>1</sup>If titanium tritide foils or scandium tritide foils are requested, provide operating temperature control and venting information. (See "Note" in Item 5 of this appendix.)

**C.6 ITEMS 7 THROUGH 11: INDIVIDUAL(S) RESPONSIBLE FOR RADIATION SAFETY PROGRAM AND THEIR TRAINING AND EXPERIENCE, TRAINING FOR INDIVIDUALS WORKING IN OR FREQUENTING RESTRICTED AREAS, FACILITIES AND EQUIPMENT, RADIATION SAFETY PROGRAM, AND WASTE MANAGEMENT**

Item No.	Title and Criteria	Yes	Description Attached
7.	<b>INDIVIDUAL(S) RESPONSIBLE FOR RADIATION SAFETY PROGRAM AND THEIR TRAINING EXPERIENCE</b>  RSO Name: <u>Lisa Gray</u>  Name(s): _____ _____ _____ _____		

Item No.	Title and Criteria	Yes	Description Attached
8.	<p><b>TRAINING FOR INDIVIDUALS WORKING IN OR FREQUENTING RESTRICTED AREAS</b></p> <p>If persons will perform any operations that involve removal of sources containing radioactive material from the device or maintenance and repair of a device that involves the source, then</p> <ul style="list-style-type: none"> <li>• Provide the name of each responsible individual who will perform the operations.</li> <li>• Provide an outline of the instruction and training each responsible individual has received in the principles and practices of radiation safety, the use of radiation detection instruments, and the operations that will be performed, including actual practice in performing the operations. Specify the amount of time spent on each topic in the training.</li> </ul> <p>Individuals working under the supervision of a responsible person named in Item 7, above, are not required to have any specific radiation safety training before using an ECD/XRF.</p>		Submit description with application
9.	<p><b>FACILITIES AND EQUIPMENT</b></p> <p>Describe the facilities where ECD/XRFs will be used and stored. State that the laboratory or area where devices are stored will be locked or secured when an authorized person is not present. Additional information on the use and storage of ECD/XRFs at a temporary jobsite also should be included in the response.</p>		Submit description with application
10.	<p><b>RADIATION SAFETY PROGRAM</b></p> <p><b>Audit Program</b> The applicant is not required to, and should not, submit its audit program to the NRC for review during the licensing phase. However, the audit program may be reviewed during NRC inspections.</p> <p><b>Radiation Monitoring Instruments</b> A radiation survey instrument for routine uses of ECD/XRF is not required.</p> <p style="text-align: center;"><b>OR</b></p> <p>If the applicant proposes to perform maintenance and repair operations, provide information about the surveys to be performed, the type of radiation survey meter to be used for conducting surveys, the range of the survey instrument, and calibration information, including frequency of calibration.</p>	N/A	
		[ ]	✗

Item No.	Title and Criteria	Yes	Description Attached
10.	<p><b>RADIATION SAFETY PROGRAM (Continued)</b></p> <p><b>Material Receipt and Accountability</b> Physical inventories will be conducted at intervals not to exceed 6 months, to account for all sealed sources and devices received and possessed under the license.</p> <p>If the devices will be used at temporary job sites, confirm that procedures will be developed and implemented to address sign-out of devices for use in the field, control and security of the device in the field, and use of the device to ensure protection of members of the public.</p> <p><b>Occupational Dose</b> Personnel monitoring devices are not required for the routine use and normal operation of ECDs/XRFs.</p> <p style="text-align: center;"><b>OR</b></p> <p>If the applicant proposes to perform maintenance and repair operations of a device that involves a source (other than in gaseous form, H-3 or Ni-63), state that: "We will maintain, for NRC inspection, documentation demonstrating that unmonitored individuals are not likely to receive a radiation dose in excess of 10 percent of the allowable limits in 10 CFR Part 20," or state "We will monitor individuals in accordance with the criteria in the section titled, 'Radiation Safety Program—Occupational Dose' in NUREG-1556, Volume 7, Revision 1, 'Consolidated Guidance About Materials Licenses: Program-Specific Guidance About Academic, Research and Development and Other Licenses of Limited Scope.'"</p>	<p><input checked="" type="checkbox"/></p> <p>[ ]</p> <p><input checked="" type="checkbox"/></p> <p>[ ]</p>	
	<p><b>Public Dose</b> The applicant is not required to submit a response to the public dose section during the licensing phase. Public dose will be reviewed during inspections to determine compliance with NRC regulations.</p>		N/A
	<p><b>Leak Tests</b> Leak tests will be performed at intervals specified in the SSD registration certificate. Leak tests will be performed by an organization that the NRC or an Agreement State has authorized to provide leak testing services for other licensees, or they will be performed using a leak test kit that an organization authorized by the NRC or an Agreement State has supplied to provide leak test kits to other licensees.</p>	<p><input checked="" type="checkbox"/></p>	

Item No.	Title and Criteria	Yes	Description Attached
10.	<p><b>RADIATION SAFETY PROGRAM (Continued)</b></p> <p><b>Maintenance</b>            If authorization has been requested to perform the maintenance and repair operations described in Item 7, state in the application that the written procedures that the device manufacturer provided will be followed for each such operation requested.</p> <p style="text-align: center;"><b>OR</b></p> <p>If a procedure will be followed other than that the device manufacturer provided, submit a proposed procedure for each operation</p> <p><b>Transportation</b>            The applicant is not required to submit its response to transportation during the licensing process. However, transportation issues will be reviewed during inspections.</p>	<p>[ ]</p> <p>*</p>	<p><input checked="" type="checkbox"/></p>
		N/A	
11.	<p><b>WASTE MANAGEMENT</b></p> <p><b>ECDs/XRFs Disposal and Transfer</b>            Disposal will be by transfer of the radioactive material to a licensee specifically authorized to possess it.</p> <p style="text-align: center;"><b>OR</b></p> <p>Provide information for an alternate method of disposal.</p>	<p><input checked="" type="checkbox"/></p> <p>*</p>	

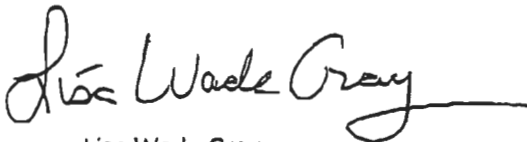
6. Gas Chromatograph for analysis
7. Lisa Wade Gray
  - I do not repair the ECD personally. Repairs are done by a technician with manufacture training. I do perform leak test twice a year.
8. Lisa Wade Gray is the only operator.
  - As stated above I do not repair nor remove any radioactive sources.
9. The Gas Chromatograph is In a permanent secure location. Only authorized personnel can access, otherwise the area is locked.
- 10.1 N/A
- 10.2 Not required
- 10.3 Physical Inventories are conducted daily
- 10.4 Not required
- 10.6 Leak tests are performed every six months
- 10.7 Maintenance- Written procedures provided by the manufacturer will be followed for each operation requested.
- 10.8 N/A
- 11 Disposal will be by transfer of the radioactive to a licensee specifically authorized to possess it.

# Marshall Lab Service

P.O. Box 130  
Marshall, Missouri 65340-0130  
660-886-9688 • FAX 660-886-7173

March 23, 2022

License #24-20003-01  
Docket #3017631  
Mail Control #629476



Lisa Wade Gray  
Lab Manager