

ADAMS Template: SECY-067

DOCUMENT DATE: 07/26/1967

TITLE: PRM-30-37 by General Laboratory Associates to Amend Part 30 for an Exemption from Licensing Requirements on Spark Gap Tubes

CASE REFERENCE: PRM on 10 CFR Part 30

KEY WORD: RULEMAKING COMMENTS

Document Sensitivity Non-sensitive – SUNSI Review Complete

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Attn: Stan Robinson

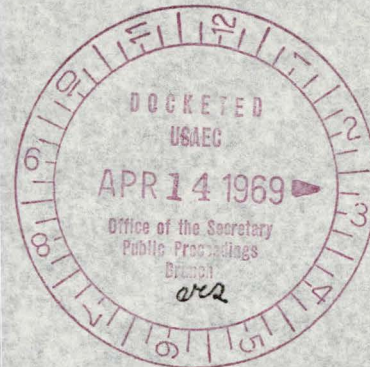
Product Standards Branch, RPS
Program Assistance Branch, RPS

DOCKET NUMBER**PETITION RULE PRM 30-37**

APR 14 1969

PRM-30-37

Mr. Richard C. Frink
Staff Engineer
General Laboratory Associates,
Incorporated
Aerospace Electronic Systems
Norwich, New York 13815



Dear Mr. Frink:

In response to your petition for rule making, PRM-30-37, enclosed is a copy of a notice of rule making to amend the Commission's regulations in 10 CFR Parts 30, 31, and 32. The amendments (1) exempt from licensing requirements the possession and use of certain electron tubes containing byproduct material; (2) revoke the exemption for glow lamps in § 30.15(a)(7); (3) revoke the general license for spark gap and electronic tubes in § 31.3; (4) amend the requirements for the issuance of specific licenses for the manufacture or import of certain items containing byproduct material; and (5) amend certain regulatory requirements applicable to holders of such licenses.

The notice is being transmitted to the Office of the Federal Register. The amendments to 10 CFR Parts 30 and 32 become effective thirty (30) days after publication in the Federal Register, and the amendment to 10 CFR Part 31 becomes effective ninety (90) days after publication in the Federal Register.

Sincerely,

Original signed by
Forrest Western

Forrest Western, Director
Division of Radiation Protection
Standards

Enclosure:
Notice of Rule Making

RPS:PAB
MBFitzPatrick:map
GLEHutton
4/ /69

RPS:DIR
FWestern
4/ /69

NOV 7 1968

PRM 30-37

Mr. Richard C. Frink
Staff Engineer
General Laboratory Associates, Inc.
Aerospace Electronic Systems
Norwich, New York 13815

Dear Mr. Frink:

Enclosed is a copy of a notice of proposed rule making to amend the Commission's regulations in 10 CFR Parts 30, 31, and 32. The proposed amendments would (1) exempt from licensing requirements the possession and use of certain electron tubes containing byproduct material, (2) revoke the general license for spark gap and electronic tubes in §31.3, (3) amend the specific licensing requirements for the manufacture or import of certain items containing byproduct material, and (4) amend the regulatory requirements applicable to holders of such licenses.

The notice is being transmitted to the Office of the Federal Register and will allow 30 days for public comment after publication in the Federal Register.

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Attn: Stan Robinson

Product Standards Branch, RPS

Sincerely,

Original signed by
Forrest Western

Forrest Western, Director
Division of Radiation Protection
Standards

Enclosure:

Notice of Proposed Rule Making

RPS:PAB
MBFitzPatrick:mfs
GLHutton

/ /68

RPS:PSB

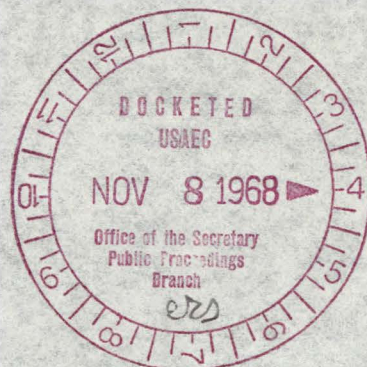
RFBarker

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RPS:DIR

FWestern

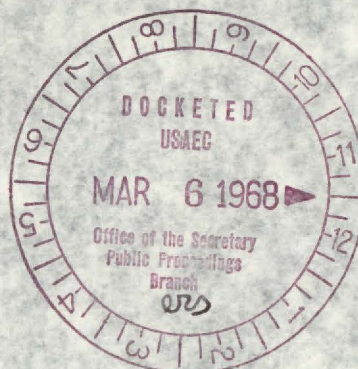
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MAR 6 1968

PRM-30-37

Mr. Richard C. Frink
Staff Engineer
General Laboratory Associates, Inc.
Aerospace Electronic Systems
Norwich, New York 13815



Dear Mr. Frink:

Thank you for your letter dated February 27, 1968, submitting additional information in support of your petition for rule making, Rocket No. PRM-30-37.

The information you have furnished on your Discharger Electron Tube P/N 73607 will receive careful study in our further consideration of your petition.

Sincerely yours,

Lester R. Rogers, Deputy Director
Division of Radiation Protection
Standards

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Attn: Stan Robinson
Product Standards Branch



RPS:PAB

RPS:PSB

RPS:DDIR

GLHutton:db

RFBarker

LRRogers

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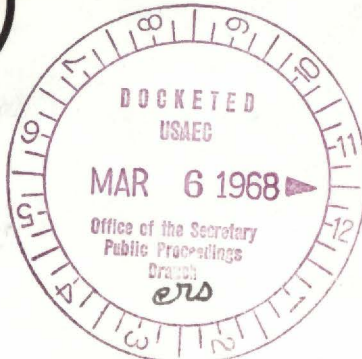
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**GENERAL LABORATORY ASSOCIATES, INC.**

Norwich, N. Y. 13815

Tel. 607-334-3264

AEROSPACE ELECTRONIC SYSTEMS

February 27, 1968

United States Atomic Energy Commission
Division of Radiation Protection Standards
Washington, D. C. 20545

Attention: Mr. Lester R. Rogers

Reference: Docket No. PRM-30-37

Dear Mr. Rogers:

Thank you for your telephone call on February 21, 1968, during which you explained what action you were taking on our petition, Docket No. PRM-30-37 (reference letter dated July 26, 1967, a copy of which is enclosed) and other similar petitions.

As promised during this telephone conversation, I am enclosing data on the specific device for which we are requesting a deviation to the present radiation requirements:

- a. Enclosed is a drawing of our Discharger Electron Tube, GLA P/N 73007 Change A. This tube is a sealed glass tube which is filled with a mixture of Kr 85 and dry air such that it has a total activity of 25 to 30 microcuries. The subject tube is used in ignition exciters which provide ignition for commercial airplanes.

When the subject tube is installed in the ignition unit which in itself is a sealed metal box, the highest geiger counter reading on any surface of the ignition box is between 0.082 and 0.164 milliroentgen per hour.

- b. The tube by itself gives a reading of 0.66 mr/hr. when the geiger counter is placed directly on the tube envelope.

U.S. ATOMIC ENERGY COM.
REGULATORY
MAIL & RECORDS SECTION

1968 MAR 1 AM 9 39

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- c. This tube would be shipped as spare parts to service depots of the airlines and the shipments run between 15 and 30 tubes per box. A geiger counter reading on any surface of a box of 30 such tubes gave a maximum reading of 0.726 mr/hr.
- d. Also, with each tube we would send a short notice, a copy of which is enclosed, which states that out of specification tubes shall be disposed of according to local laws and regulations. We would add to this notice a statement to the effect that reject tubes could be returned to GLA for disposal if such was their desire.

I hope that the above data will be informative and aid in a faster decision on our petition, Docket No. PRM-30-37. If further information is requested, please contact us.

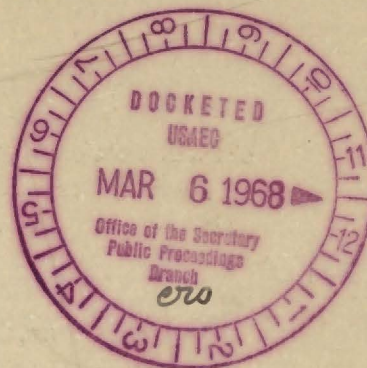
Very truly yours,



Richard C. Frink
Staff Engineer

RCF/mls
Encl.

July 26, 1967



Mr. William O. Miller
Isotopes Branch
Division of Material Licensing
U. S. Atomic Energy Commission
Washington, D.C.

Dear Mr. Miller:

We manufacture ignition and accessory equipment for aircraft and missile applications. In some of our equipment we use spark gaps which we manufacture. These are sealed glass gaps which have a fill of dry air and Krypton 85. The Krypton 85 that we use has a specific activity of 5 microcuries per milliliter. In the majority of our applications, the total activity of the spark gaps is less than 5 microcuries which exempts us from the requirement of having our customers need a specific license for receiving them. However, in a few applications we require a fill in certain spark gaps which have a total activity greater than 5 microcuries but less than 30 microcuries. In these instances, our customers require specific licenses. We have a problem that occurs when spark gaps are sold as spare parts for repair of these units. These gaps do not necessarily go to the original customer but to repair and maintenance shops in various parts of the country which do not have specific licenses for receiving these spark gaps.

If possible, we would like to receive an authorization from you which treats these sealed spark gaps containing a total activity greater than 5 microcuries and less than 30 microcuries of Krypton 85 as consumer items which are exempt from New York State and all agreement states licensing requirements.

Please inform us if this type of exemption is permitted and if so, forward the necessary forms to obtain such an exemption.

Your cooperation is very much appreciated.

Very truly yours,

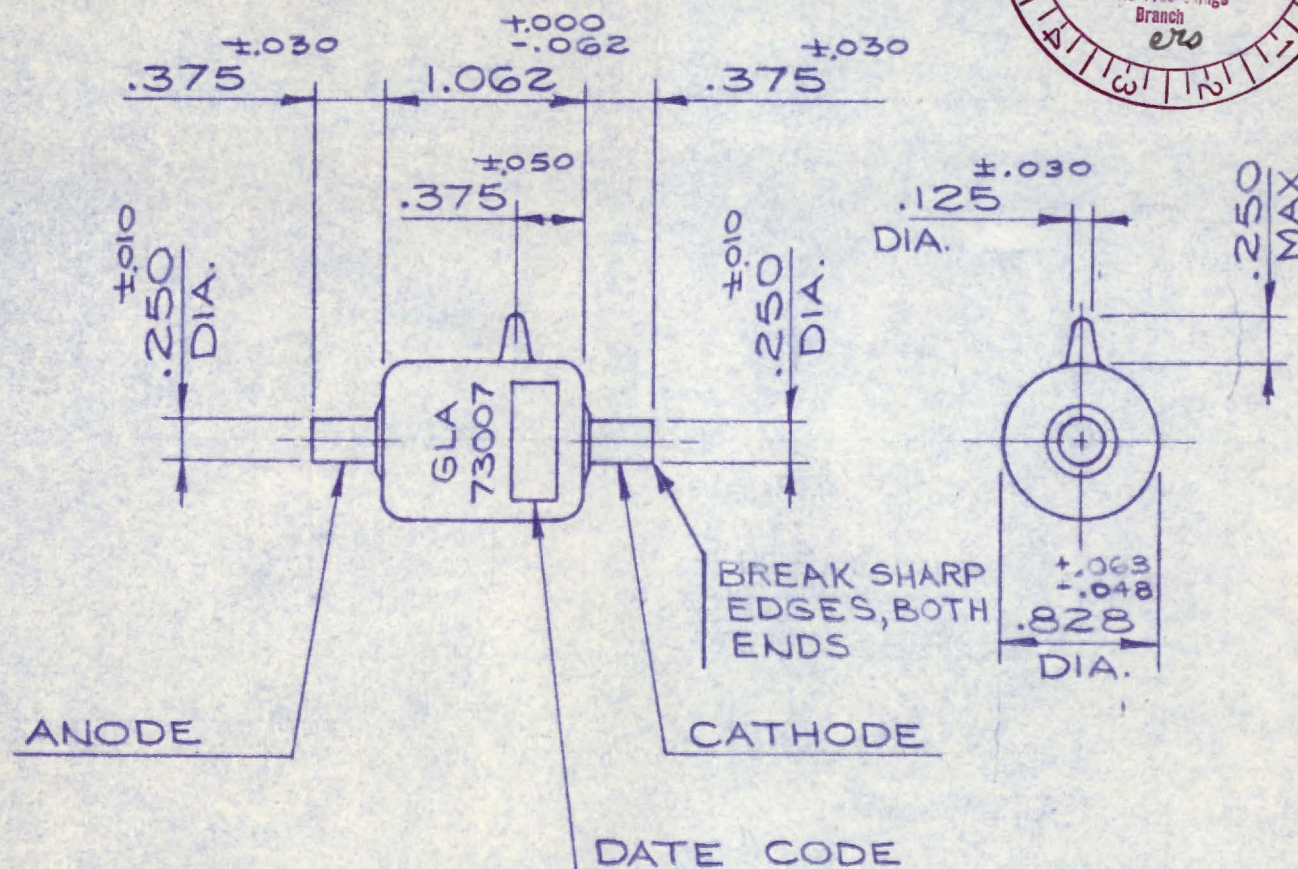
Richard C. Frink
Staff Engineer

DO NOT SCALE-WORK TO DIMENSIONS GIVEN

NOTE:

1. TYPE DSR
2. VOLTAGE RATING: 3300-3400 V

DOCKET NUMBER
PETITION RULE PRM-30-37



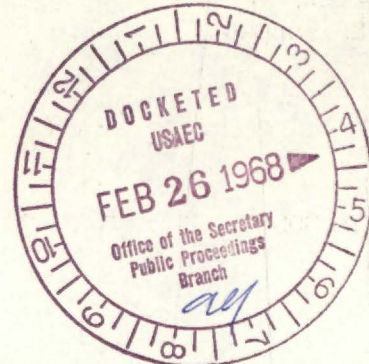
FOR REFERENCE ONLY
NOT TO BE USED FOR MFG.
FEB 26 1968

SCALE 2:1

CODE IDENT NO. 83311

MATERIAL SPEC. NO.		GENERAL LABORATORY ASSOCIATES, INC.				TOLERANCES UNLESS OTHERWISE SPECIFIED			
SEE NOTE		NORWICH, NEW YORK				FRACTIONS $\pm 1/32$ DECIMALS $\pm .010$ ANGLES $\pm 2^\circ$			
ENGINEERING SPEC. NO.		NAME				CONCENTRICITY MUST BE WITHIN ONE HALF THE SUM OF THE TOTAL TOLERANCES F. I. R.			
SEE NOTE		ELECTRON TUBE, DISCHARGER				MACHINED SURFACES MUST BE FLAT AND PARALLEL WITHIN THE APPLICABLE DIMENSIONS.			
PROCESS SPEC. NO.		D'MAN				STAND. PROCEDURE APPLICABLE			
55179, 24822		EXP. APP'D				YES <input type="checkbox"/> NO <input checked="" type="checkbox"/>			
SOURCE 1		CHECKER				NEXT ASSEMBLY			
SEE NOTE 1 & 2		12/27/62				15960			
		PROD. APP'D				CODE NO. 398			
		SCALE				REF.			
		1:1							
		WT. - LBS.							
		PART NO				73007			

PRM 30-37



Mr. Richard C. Frink
Staff Engineer
General Laboratory Associates, Inc.
P. O. Box No. 310
Norwich, New York 13815

Dear Mr. Frink:

Thank you for your letter of January 2, 1968, inquiring as to the status of your petition, PRM 30-37, and offering to supply additional information.

We are developing for Commission consideration a proposed rule that would, under certain conditions, exempt from licensing requirements the possession and use of electronic tubes containing byproduct material. A manufacturer desiring to transfer electronic tubes containing byproduct material to exempt persons would be required to obtain a specific license from the AEC authorizing such transfer. As a requirement to obtain a specific license authorizing transfer of electronic tubes under the exemption it would be necessary for the manufacturer to demonstrate that specified safety criteria are met.

We will appreciate receiving any additional information which you may have available relating to potential radiation exposures from electronic tubes containing byproduct material.

We will inform you promptly when a decision is reached by the Commission on a proposed rule relating to your petition.

Sincerely yours,

Lester R. Rogers, Deputy Director
Division of Radiation Protection Standards

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Public Document Room

OFFICE ▶	RPS:DepDir	RPS:PSB	RPS:PSB	RPS:PAB	OGC	
SURNAME ▶	LRRogers:sf	JJHenry	RFBarker	GLHutton	gmb	
DATE ▶	2/23/68	SEE ATTACHED CONCURRENCES			2/26/68	

GENERAL LABORATORY ASSOCIATES, INC.

NORWICH, N. Y. 13815

TEL. 607-334-3264

GLA

GENERAL LABORATORY ASSOCIATES, INC.
P. O. BOX NO. 310
NORWICH, N. Y. 13815

January 2, 1968

United States Atomic Energy Commission
Washington, D. C. 20545

Attention: Mr. Forrest Western, Director
Division of Radiation Protection Standards

Reference: Docket No. PRM-30-37

Gentlemen:

Our last response from you on Docket No. PRM-30-37
was dated September 30, 1967.

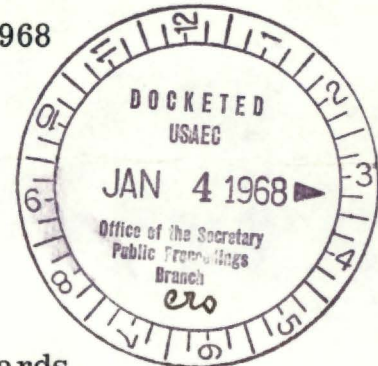
We are interested in the progress on the review of our
petition which was assigned the subject docket number. We
would appreciate your earliest response and would be glad
to supply any additional information that you may require.

Very truly yours,

Richard C. Frink

Richard C. Frink
Staff Engineer

RCF/mls



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1968-1-4 AM 9 46

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REGULATORY

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1968-1-4 AM 9 46

ATOMIC ENERGY COMMISSION[DOCKET NO. PRM-30-37]GENERAL LABORATORY ASSOCIATES, INC.Notice of Filing of Petition for Rule Making

Notice is hereby given that General Laboratory Associates, Inc., by letter dated July 26, 1967, has filed with the Commission a petition for rule making to amend the Commission's regulations pertaining to the licensing of byproduct material.

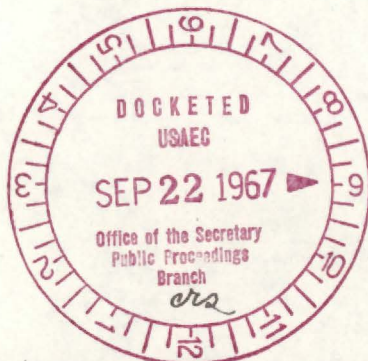
The petitioner requests that the Commission amend its regulation "Licensing of Byproduct Material," 10 CFR Part 30 so as to exempt from licensing requirements spark gap tubes containing up to 30 microcuries of krypton 85.

A copy of the petition for rule making is available for public inspection in the Commission's Public Document Room at 1717 H Street, NW., Washington, D. C.

Dated at Germantown, Md.
day of September

this twenty-second
1967.

For the Atomic Energy Commission



W. B. McCool
Secretary

EACH TUBE P/N 73007 CONTAINS
LESS THAN THIRTY (30)
MICROCURIES OF KRYPTON 85.
PRECAUTIONS: DUE TO THE
NEGGLIGIBLE AMOUNT OF RADIO-
ACTIVITY, NO SPECIAL
PRECAUTIONS MUST BE OBSERVED.
DISPOSAL: TUBES SHALL BE
DISPOSED OF IN ACCORDANCE
WITH LOCAL LAWS OR REGULA-
TIONS.

DOCKET NUMBER

PETITION RULE PRM-30-37

DOCKET NUMBER **PRM 30-37**
PETITION RULE

SEP 20 1967

PRM-30-37

Mr. Richard C. Frink
Staff Engineer
General Laboratory Associates, Inc.
Norwich, New York 13815

Dear Mr. Frink:

Thank you for your letter of July 26, 1967, which is considered a petition for rule making as provided for by 10 CFR Part 2.802 of the Commission's regulations.

Your letter has been docketed as a petition for rule making to recognize the request for an amendment of the Commission's regulations in 10 CFR Part 30 to exempt from licensing requirements spark gap tubes which contain up to 30 microcuries of krypton 85.

The petition has been assigned Docket No. PRM-30-37 and further correspondence pertaining to the petition should reference this docket number. As staff review progresses on your petition it may be necessary to request additional information.

Sincerely yours,
ORIGINAL SIGNED BY
LESTER R. ROGERS

Forrest Western, Director
Division of Radiation Protection Standards

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G. L. Hutton, RPS

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GLHutton:mfs	RFBarker		
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**GENERAL LABORATORY ASSOCIATES, INC.**

Norwich, N. Y. 13815

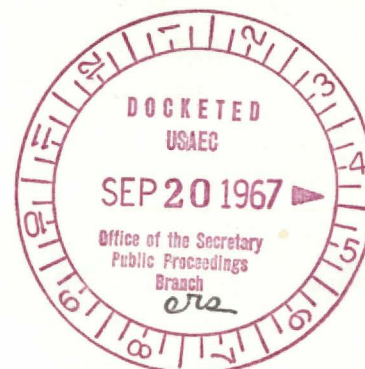
Tel. 607-334-3264

AEROSPACE ELECTRONIC SYSTEMS

July 26, 1967

Mr. William O. Miller
Isotopes Branch
Division of Material Licensing
U. S. Atomic Energy Commission
Washington, D.C.

Dear Mr. Miller:



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Please inform us if this type of exemption is permitted and if so, forward the necessary forms to obtain such an exemption.

Your cooperation is very much appreciated.

Very truly yours,

DUPLICATED
FOR DIV. OF COMPLIANCE

Richard C. Frink
Richard C. Frink
Staff Engineer

RCF/jj

1352

GENERAL LABORATORY ASSOCIATES, INC.



GENERAL LABORATORY ASSOCIATES, INC.

P. O. BOX NO. 310

NORWICH, N. Y. 13815



Mr. William O. Miller
Isotopes Branch
Division of Material Licensing
U. S. Atomic Energy Commission
Washington, D. C.