

MATERIALS LICENSE

Pursuant to the Atomic Energy Act of 1954, as amended, the Energy Reorganization Act of 1974 (Public Law 93-438), and Title 10, Code of Federal Regulations, Chapter I, Parts 30, 31, 32, 33, 34, 35, 36, 37, 39, 40, 70 and 71, and in reliance on statements and representations heretofore made by the licensee, a license is hereby issued authorizing the licensee to receive, acquire, possess, and transfer byproduct, source, and special nuclear material designated below; to use such material for the purpose(s) and at the place(s) designated below; to deliver or transfer such material to persons authorized to receive it in accordance with the regulations of the applicable Part(s). This license shall be deemed to contain the conditions specified in Section 183 of the Atomic Energy Act of 1954, as amended, and is subject to all applicable rules, regulations, and orders of the Nuclear Regulatory Commission now or hereafter in effect and to any conditions specified below.

<p>Licensee</p> <p>1. Niowave, Inc.</p>	<p>In accordance with letter dated October 20, 2023,</p>	<p>4. Expiration Date: March 31, 2025</p>
<p>2. 1012 N Walnut St. Lansing, MI 48906-5061</p>	<p>3. License No.: 21-35144-02 is amended in its entirety to read as follows:</p>	<p>5. Docket No.: 030-38770 Reference No.:</p>

6. Byproduct, source, and/or special nuclear material	7. Chemical and/or physical form	8. Maximum amount that licensee may possess at any one time under this license	9. Authorized use
A. Uranium-234	A. Solid	A. 0.88 grams (5.45 millicuries) (enriched uranium)	A. For research and development as defined in 10 CFR 30.4.
B. Uranium-235	B. Solid	B. 120 grams (0.26 millicuries) (enriched uranium)	B. Same as Item 9.A.
C. Uranium-238	C. Solid	C. 16.76 kilograms (5.63 millicuries) (enriched uranium)	C. Same as Item 9.A.
D. Uranium (Natural)	D. Solid	D. 454 kilograms (322 millicuries)	D. Same as Item 9.A.
E. Uranium (Natural)	E. Any	E. 50 kilograms (35.5 millicuries)	E. Same as Item 9.A.
F. Thorium (Natural)	F. Solid	F. 230 kilograms (50 millicuries)	F. Same as Item 9.A.

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G. Molybdenum-99	G. Solid	G. 160 millicuries total	G. (1) For production, possession, or handling of radiochemicals for transfer to persons authorized to receive the licensed material in accordance with the terms and conditions of a specific license issued by the U.S. Nuclear Regulatory Commission or an Agreement State. (2) Research and development as defined in 10 CFR 30.4. (3) For packaging and distribution of produced radiochemicals to persons authorized to receive licensed materials in accordance with the terms and conditions of specific licenses issued by the U.S. Nuclear Regulatory Commission or Agreement States. This material should not be distributed as a radiopharmaceutical or radioactive drug.
H. Molybdenum-99	H. Any	H. 4 millicuries total	H. Same as Item 9.G.
I. Strontium-89	I. Solid	I. 160 millicuries total	I. Same as Item 9.G.
J. Strontium-89	J. Any	J. 4 millicuries total	J. Same as Item 9.G.
K. Strontium-91	K. Solid	K. 160 millicuries total	K. Same as Item 9.G.
L. Strontium-91	L. Any	L. 4 millicuries total	L. Same as Item 9.G.
M. Strontium-92	M. Solid	M. 160 millicuries total	M. Same as Item 9.G.



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N. Strontium-92	N. Any	N. 4 millicuries total	N. Same as Item 9.G.
O. Krypton- 85m	O. Solid	O. 160 millicuries total	O. Same as Item 9.G.
P. Krypton- 85m	P. Any	P. 20 millicuries total	P. Same as Item 9.G.
Q. Krypton-87	Q. Solid	Q. 160 millicuries total	Q. Same as Item 9.G.
R. Krypton-87	R. Any	R. 20 millicuries total	R. Same as Item 9.G.
S. Krypton-88	S. Solid	S. 160 millicuries total	S. Same as Item 9.G.
T. Krypton-88	T. Any	T. 20 millicuries total	T. Same as Item 9.G.
U. Iodine-131	U. Solid	U. 160 millicuries total	U. Same as Item 9.G.
V. Iodine-131	V. Any	V. 4 millicuries total	V. Same as Item 9.G.
W. Iodine-132	W. Solid	W. 160 millicuries total	W. Same as Item 9.G.
X. Iodine-132	X. Any	X. 4 millicuries total	X. Same as Item 9.G.
Y. Iodine-132m	Y. Solid	Y. 160 millicuries total	Y. Same as Item 9.G.
Z. Iodine-132m	Z. Any	Z. 4 millicuries total	Z. Same as Item 9.G.
AA. Iodine-133	AA. Solid	AA. 160 millicuries total	AA. Same as Item 9.G.
AB. Iodine-133	AB. Any	AB. 4 millicuries total	AB. Same as Item 9.G.
AC. Iodine-134	AC. Solid	AC. 160 millicuries total	AC. Same as Item 9.G.
AD. Iodine-134	AD. Any	AD. 4 millicuries total	AD. Same as Item 9.G.

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AE. Iodine-135	AE. Solid	AE. 160 millicuries total	AE. Same as Item 9.G.
AF. Iodine-135	AF. Any	AF. 4 millicuries total	AF. Same as Item 9.G.
AG. Xenon-133	AG. Solid	AG. 160 millicuries total	AG. Same as Item 9.G.
AH. Xenon-133	AH. Any	AH. 20 millicuries total	AH. Same as Item 9.G.
AI. Xenon-133m	AI. Solid	AI. 160 millicuries total	AI. Same as Item 9.G.
AJ. Xenon-133m	AJ. Any	AJ. 20 millicuries total	AJ. Same as Item 9.G.
AK. Xenon-138	AK. Solid	AK. 160 millicuries total	AK. Same as Item 9.G.
AL. Xenon-138	AL. Any	AL. 20 millicuries total	AL. Same as Item 9.G.
AM. Any byproduct material with Atomic Numbers 1 through 83 with half-life less than or equal to 120 days	AM. Solid	AM. 3 curies total	AM. Same as Item 9.G.
AN. Any byproduct material with Atomic Numbers 1 through 83 with half-life less than or equal to 120 days	AN. Any	AN. 100 millicuries total	AN. Same as Item 9.G.
AO. Any byproduct material with Atomic Numbers 1 through 83 with half-life greater than 120 days	AO. Solid	AO. 50 millicuries total	AO. Same as Item 9.G.

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AP. Any byproduct material with Atomic Numbers 1 through 83 with half-life greater than 120 days	AP. Any	AP. 10 millicuries total	AP. Same as Item 9.G.
AQ. Any byproduct material with Atomic Numbers 84 through 103	AQ. Solid	AQ. 1 curie total	AQ. For possession and storage of byproduct materials incidental to radionuclide production.
AR. Any byproduct material with Atomic Numbers 84 through 103	AR. Any	AR. 60 millicuries total	AR. For possession and storage of byproduct materials incidental to radionuclide production.
AS. Gold-198	AS. Solid	AS. 1 millicurie total	AS. Same as Item 9.G.
AT. Californium-252	AT. Sealed Sources (Frontier Technology Corporation, Model FTC 100 Series)	AT. 20 microcuries per source and 20 microcuries total	AT. For use as calibration and/or reference standards.
AU. Any byproduct material with Atomic Numbers 1 through 83 with half-life less than or equal to 120 days	AU. Incidentally Activated Products	AU. 501 microcuries total	AU. For possession and storage of byproduct materials incidental to target activation.
AV. Any byproduct material with Atomic Numbers 1 through 83 with half-life greater than 120 days	AV. Incidentally Activated Products	AV. 10 microcuries total	AV. For possession and storage of byproduct materials incidental to target activation.
AW. Europium-152	AW. Custom Sealed Source (Eckert & Ziegler,)	AW. 150 microcuries per source and 450 microcuries total	AW. In NIST traceable standard calibration sources for use in calibration and/or reference standards.
AX. Radium-226	AX. Any	AX. 120 millicuries total	AX. For possession and use in accordance with letters dated March 2, 2018 (ML18064A260) and March 10, 2020 (ML20071J022).

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AY. Radon-222	AY. Any	AY. 2 curies total	AY. Same as Item 9.G.
AZ. Actinium-225	AZ. Activation Products	AZ. 10 millicuries total	AZ. Same as Item 9.G.
BA. Lead-210	BA. Any	BA. 120 millicuries total	BA. Same as Item 9.G.
BB. Lead-214	BB. Any	BB. 2 curies total	BB. Same as Item 9.G.
BC. Bismuth-210	BC. Any	BC. 120 millicuries total	BC. Same as Item 9.G.
BD. Bismuth-213	BD. Any	BD. 10 millicuries total	BD. Same as Item 9.G.
BE. Bismuth-214	BE. Any	BE. 2 curies total	BE. Same as Item 9.G.
BF. Polonium-210	BF. Any	BF. 120 millicuries total	BF. Same as Item 9.G.
BG. Any byproduct material with Atomic Numbers 81 or greater with half-life less than or equal to 120 days	BG. Incidentally Activated Products	BG. 615 millicuries total	BG. For possession and storage of byproduct materials incidental to possession of radium-226.
BH. Any byproduct material with half-life less than or equal to 120 days	BH. Activation Products	BH. 500 microcuries total	BH. For possession and storage of activated radioactive materials incidental to irradiation of licensed materials.
BI. Any byproduct material with half-life greater than 120 days	BI. Activation Products	BI. 10 microcuries total	BI. For possession and storage of activated radioactive materials incidental to irradiation of licensed materials.
BJ. Xenon-135	BJ. Solid	BJ. 160 millicuries total	BJ. Same as Item 9.G.
BK. Xenon-135	BK. Any	BK. 20 millicuries total	BK. Same as Item 9.G.

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BL. Cobalt-57	BL. Any	BL. 10 microcuries per source and 30 microcuries total	BL. Same as Item 9.AW.
BM. Cadmium-109	BM. Any	BM. 10 microcuries per source and 30 microcuries total	BM. Same as Item 9.AW.
BN. Barium-133	BN. Any	BN. 10 microcuries per source and 30 microcuries total	BN. Same as Item 9.AW.
BO. Tellurium-132m	BO. Any	BO. 10 microcuries per source and 30 microcuries total	BO. Same as Item 9.AW.
BP. Europium-154	BP. Any	BP. 10 microcuries per source and 30 microcuries total	BP. Same as Item 9.AW.
BQ. Europium-155	BQ. Any	BQ. 10 microcuries per source and 30 microcuries total	BQ. Same as Item 9.AW.
BR. Holmium-166m	BR. Any	BR. 10 microcuries per source and 30 microcuries total	BR. Same as Item 9.AW.
BS. Lead-210	BS. Any	BS. 10 microcuries per source and 30 microcuries total	BS. Same as Item 9.AW.
BT. Plutonium-239	BT. Any	BT. 1 microcurie per source and 3 microcuries total	BT. Same as Item 9.AW.
BU. Americium-241	BU. Any	BU. 1 microcurie per source and 3 microcuries total	BU. Same as Item 9.AW.

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6. Byproduct, source, and/or special nuclear material

7. Chemical and/or physical form

8. Maximum amount that licensee may possess at any one time under this license

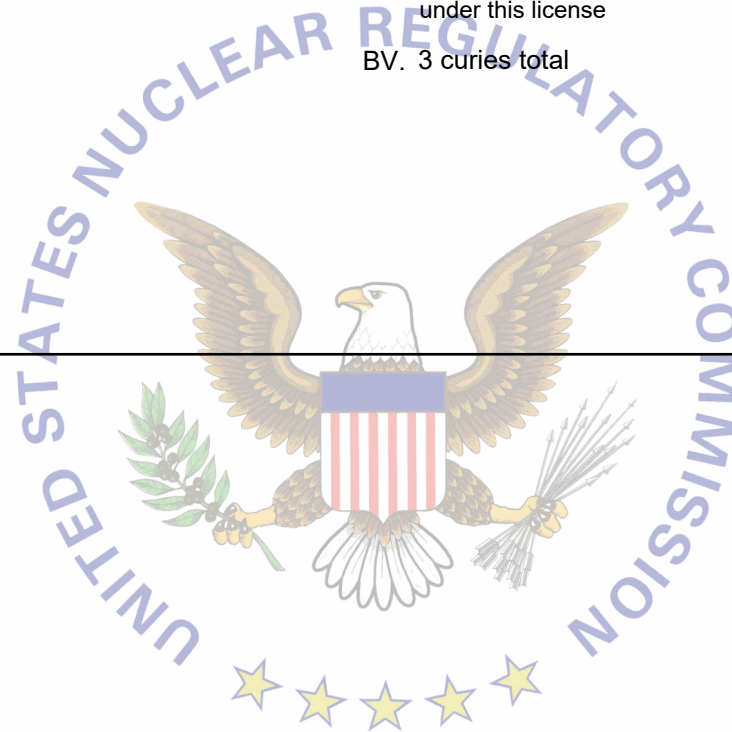
9. Authorized use

BV. Uranium- depleted in Uranium-235

BV. Solid

BV. 3 curies total

BV. For research and development as defined in 10 CFR 30.4, and manufacturing and transferring of shielding and accelerator parts to persons authorized to receive the licensed material in accordance with the terms and conditions of a specific license issued by the U.S. Nuclear Regulatory Commission or an Agreement State.



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CONDITIONS

10. Licensed material shall be used or stored only at the licensee's facilities located at 1012 N Walnut St., Lansing, Michigan, 48906.
11. The Radiation Safety Officer (RSO) for this license is William Peters, Ph.D.
12. Licensed material shall only be used by, or under the supervision of:
- | <u>Authorized Users</u> | <u>Material and Use</u> |
|-------------------------|--|
| Alex Bakken, Ph.D. | All, except Item 6.BV. |
| Artem Gelis, Ph.D. | All, except Item 6.BV. |
| Terry Grimm, Ph.D. | All, except Items 6.AX. through 6.BI. (limited to licensed materials in solid form only) |
| Nathan Johnson | All, except Item 6.BV. |
| Christine Krizmanich | All, except Item 6.BV. |
| William Peters, Ph.D. | All |
| Kristin Shannon, Ph.D. | All, except Item 6.BV. |
13. This license does not authorize commercial distribution of licensed material pursuant to 10 CFR 32.72 or 10 CFR 32.74 to persons generally licensed pursuant to 10 CFR Part 31 or equivalent regulations of any Agreement State; or to persons exempt from licensing pursuant to 10 CFR 30.14 through 10 CFR 30.21 inclusive, or equivalent regulations of any Agreement State.
14. A. Sealed sources shall be tested for leakage and/or contamination at intervals not to exceed the intervals specified in the certificate of registration issued by the U.S. Nuclear Regulatory Commission under 10 CFR 32.210 or by an Agreement State. In the absence of a registration certificate, sealed sources shall be tested for leakage and/or contamination at intervals not to exceed 6 months, or at such other intervals as specified.

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- B. In the absence of a certificate from a transferor indicating that a leak test has been made within the intervals specified in the certificate of registration issued by the U.S. Nuclear Regulatory Commission under 10 CFR 32.210 or by an Agreement State, prior to the transfer, a sealed source received from another person shall not be put into use until tested and the test results received.
- C. Sealed sources need not be tested if they contain only hydrogen-3; or they contain only a radioactive gas; or the half-life of the isotope is 30 days or less; or they contain not more than 100 microcuries of beta- and/or gamma-emitting material or not more than 10 microcuries of alpha-emitting material.
- D. Sealed sources need not be tested if they are in storage and are not being used. However, when they are removed from storage for use or transferred to another person, and have not been tested within the required leak test interval, they shall be tested before use or transfer. No sealed source shall be stored for a period of more than 10 years without being tested for leakage and/or contamination.
- E. The leak test shall be capable of detecting the presence of 185 becquerels (0.005 microcuries) of radioactive material on the test sample. If the test reveals the presence of 185 becquerels (0.005 microcuries) or more of removable contamination, a report shall be filed with the U.S. Nuclear Regulatory Commission in accordance with 10 CFR 30.50(c)(2), and the source shall be removed immediately from service and decontaminated, repaired, or disposed of in accordance with Commission regulations.
- F. Analysis of leak test samples and/or contamination shall be performed by persons specifically licensed by the U.S. Nuclear Regulatory Commission or an Agreement State to perform such services. The licensee is authorized to collect leak test samples but not perform the analysis.
- G. Records of leak test results shall be kept in units of becquerels (microcuries) and shall be maintained for 3 years.
15. Sealed sources containing licensed material shall not be opened or sources removed from source holders by the licensee, except as specifically authorized.
16. The licensee is authorized to hold radioactive material with a physical half-life of less than or equal to 120 days for decay-in-storage before disposal in ordinary trash provided:

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- A. Before disposal as ordinary trash, the waste shall be surveyed at the container surface with the appropriate survey instrument set on its most sensitive scale and with no interposed shielding to determine that its radioactivity cannot be distinguished from background. All radiation labels shall be removed or obliterated.
- B. A record of each such disposal permitted under this license condition shall be retained for 3 years. The record must include the date of disposal, the date on which the byproduct material was placed in storage, the radionuclides disposed, the survey instrument used, the background dose rate, the dose rate measured at the surface of each waste container, and the name of the individual who performed the disposal.
17. The licensee shall conduct a physical inventory every 6 months, or at other intervals approved by the U.S. Nuclear Regulatory Commission, to account for all sealed sources and/or devices received and possessed under the license. Records of inventories shall be maintained for 3 years from the date of each inventory, and shall include the radionuclides, quantities, manufacturer's name and model numbers, and the date of the inventory.
18. In addition to the possession limits in Item 8, the licensee shall further restrict the possession of licensed material in the form of unsealed material and foil or plated sources to quantities below the limits specified in 10 CFR 30.72, which require consideration of the need for an emergency plan for responding to a release of licensed material.
19. Except as specifically provided otherwise in this license, the licensee shall conduct its program in accordance with the statements, representations, and procedures contained in the documents, including any enclosures, listed below. This license condition applies only to those procedures that are required to be submitted in accordance with the regulations. The U.S. Nuclear Regulatory Commission's regulations shall govern unless the statements, representations, and procedures in the licensee's application and correspondence are more restrictive than the regulations.
- A. Application dated February 11, 2015 (ML15043A755)
- B. Letter dated February 11, 2015 (ML15043A755)
- C. Letter dated February 24, 2015 (ML15065A251)

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- D. Letter dated March 5, 2015 (ML15065A252)
- E. Letter dated March 18, 2015 (ML15077A371)
- F. Letter dated July 7, 2015 excluding change to upper limit of low enriched uranium to <20% (ML15196A611)
- G. Letter dated September 24, 2015 (ML15272A374)
- H. RSO delegation of authority dated October 6, 2015 (ML15280A086)
- I. Letter dated January 20, 2017 excluding the request for low enriched uranium and natural uranium in readily dispersible form (ML17027A205)
- J. Letter dated April 21, 2017 (ML17114A407)
- K. Letter dated August 9, 2017 (ML17227A249)
- L. Letter dated October 12, 2017 (ML17285A908)
- M. Letter dated January 19, 2018 (ML18025B330)
- N. Letter dated February 5, 2017 received February 5, 2018 (ML18036A980)
- O. Letter dated June 29, 2018 (ML18183A306)
- P. Letter dated September 10, 2018 (ML18254A360)
- Q. Letter dated September 28, 2018 (ML18274A261)
- R. Letter dated March 2, 2018 excluding Decommissioning Funding Plan & Cost Estimate (ML18064A260)
- S. Letter dated July 17, 2018 (ML18199A455)
- T. Letter dated September 24, 2018 (ML18269A294)
- U. Letter dated March 5, 2019 (ML19065A058)
- V. Letter dated August 5, 2019 (ML19218A301)
- W. Letter dated August 15, 2019 excluding Appendix D: Details of the Decommissioning Cost Estimate (ML19233A247)
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- The seal of the U.S. Nuclear Regulatory Commission is centered on the page. It features an eagle with its wings spread, perched on a shield with vertical stripes. The eagle is holding an olive branch in its right talon and arrows in its left. Below the eagle are five stars. The words "U.S. NUCLEAR REGULATORY COMMISSION" are written in a circular path around the eagle.

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- X. Letter dated October 23, 2019 (ML19297D910)
- Y. Letter dated March 10, 2020 excluding Decommissioning Funding Plan & Cost Estimate (ML20071J022)
- Z. Letter dated May 29, 2020 (ML20153A020)
- ZA Letter dated June 7, 2022 (ML22164A030)
- ZB Letter dated June 29, 2022 (ML22181B061)
- ZC Letter dated August 9, 2022 (ML22234A200)



FOR THE U.S. NUCLEAR REGULATORY COMMISSION

Date: January 9, 2024

By: _____
Frank P. D. Tran
Region 3