**Fluor Fernald, Inc.**
P.O. Box 538704
Cincinnati, OH 45253-8704

006234

**FLUOR**

October 27, 2006

Fernald Closure Project
Letter No. C:CPD:2006-0255

Mr. Thomas Maveal
S.M Stoller
2597 B3/4 Road
Grand Junction, CO 81503

Dear Mr. Maveal:

**CONTRACT DE-AC24-01OH20115, TRANSFER OF CUSTODY AND CONTROL OF RADIATION MONITORING-RELATED EQUIPMENT AND RADIOACTIVE SOURCES FROM FLUOR FERNALD, INC. TO S.M. STOLLER**

This letter documents the transfer of custody and control of the Department of Energy (DOE) owned radiation monitoring-related equipment and radioactive sources listed in Enclosure A from Fluor Fernald, Inc. (Fluor Fernald) to the S.M. Stoller Corporation, effective this date. These instruments and sources are necessary for post-closure Legacy Management activities including the Environmental Air Monitoring Program, potential contamination/personnel exposure monitoring, and operability checks of radiation detection/counting instruments.

In accordance with Title 10, Code of Federal Regulations (CFR), Subsection 835.1201 (Sealed Radioactive Source Control), "Sealed radioactive sources shall be used, handled, and stored in a manner commensurate with the hazards associated with operations involving the sources." Because the subject sources are "non-accountable" or "exempt" (i.e., the isotopic activities are less than the corresponding values for "accountable sealed sources" provided in Appendix E to 10 CFR 835), they are exempted from the inventory and leak test requirements established at 10 CFR 835.1201. They should, however, be controlled as radioactive material.

The Calibration Certificates for four of the five subject sources are included as Enclosure B. The fifth certificate is being retrieved from Federal Record Center archives in Dayton, Ohio and will be provided upon receipt. Removable contamination surveys (leak tests) of the sources conducted on October 26 and 27, 2006, while not required, are included at your request as Enclosure C.

006234

We have also included an "authorization letter" (Enclosure D), which addresses Fluor Fernald's "Authorization to Acquire, Receive, Transfer, Possess, and/or Use Radioactive Material at/by/from the Department of Energy Fernald Closure Project (FCP)." U.S. Nuclear Regulatory Commission (NRC) regulations and the State of Ohio Administrative Code specifically exempt DOE Prime Contractors from requirements for an NRC and State of Ohio radioactive material license, respectively; the authority for such possession and use is derived of the DOE Contract. If you have not done so already, you might consider a modification of this letter to address the possession, use, transfer, etc. of radioactive material/sources by the S.M. Stoller Corporation under its DOE Legacy Management Contract.

Should you have questions in regard to the subject equipment and source transfers and/or the enclosed documents, please contact Robert Burgin, FCP Site Radiation Source Controller, at (513) 648-4318 or robert.burgin@fernald.gov.

Sincerely,

Cornelius M. Murphy
Closure Project Director

CMM:REB:wls

Enclosure
c: Timothy L. Jones, DOE Contracting Officer, DOE/EMCBC
Donna Metzler, Stoller, MS 2
Michele L. Miller, Stoller, MS 2
Katie Paine, Stoller, MS 12
Johnny W. Reising, DOE-OH/FCP MS 2
Dennis Sizemore, Fluor Fernald, Inc. Prime Contract, MS 1
Tammy Terry, MS 1
Administrative Record (w/2 Enclosures), MS 6
File Record Subject: Transfer of Custody and Control of the Department of Energy (DOE) Owned Radiation Monitoring-related Equipment and Radioactive Sources from Fluor Fernald, Inc. to S.M. Stoller
Letter Log Copy, MS 1

# Enclosure A

Re: Transfer of custody and control of the DOE-owned radiation monitoring-related equipment and radioactive sources listed below from Fluor Fernald, Inc. (Fluor Fernald) to the S.M. Stoller Corporation, effective October 27, 2006.

**Equipment**

| Item | Manufacturer/Model Number | Serial Number |
|---|---|---|
| Air Sampler | BZ (Breathing Zone) | 612071 |
| Air Sampler | BZ (Breathing Zone) | 626886 |
| Air Sampler | BZ (Breathing Zone) | 691420 |
| Air Sampler | BZ (Breathing Zone) | 767928 |
| Air Sampler | SAIC Variable Flow | FHV-001899 |
| Alpha Frisker | Ludlum Model 2221 | 75436 |
| Alpha Frisker | Ludlum Model 2221 | 75480 |
| Beta-Gamma Frisker | Ludlum Model 3 | 89745 |
| Beta-Gamma Frisker | Ludlum Model 3 | 97137 |
| BZ Air Sampler Charger | SKC Model 223-426 | 01-110-87 |
| Rotometer | Dwyer Model VB-66 | R-109 |
| Survey Meter | Bicron Micro-Rem | B732T |
| Survey Meter | Bicron Micro-Rem | B709T |

**Radioactive Sources**

| Isotope | Activity | Description | Serial/ID Number | Cert.* |
|---|---|---|---|---|
| Cs-137 | 0.936 uCi | Button Source | 405-60-14 | No |
| Ra-226 | 0.00134 uCi | Pylon Model 3150A Radon Gas Generator – Pylon Check Source | 113 | Yes |
| Ra-226 | 0.00134 uCi | Pylon Model 3150A Radon Gas Generator – Pylon Check Source | 237 | Yes |
| Sr/Y-90 | 0.021 uCi | Sealed source | 99SR4703981 | Yes |
| Th-230 | 0.035 uCi | Sealed source | KR-368 | Yes |

* Yes = A copy of the Source Calibration Certificate is included in Enclosure B.
No = A copy of the Source Calibration Certificate is being retrieved from Federal Archives in Dayton, OH.

# Enclosure B

Enclosure B consists of verified copies of Source Calibration Certificates for the following radioactive sources being transferred from Fluor Fernald, Inc. to the S.M. Stoller Corporation, effective October 27, 2006.

**Radioactive Sources**

| Isotope | Activity | Description | Serial/ID Number | Cert.* |
|---|---|---|---|---|
| Cs-137 | 0.936 uCi | Button Source | 405-60-14 | No |
| Ra-226 | 0.00134 uCi | Pylon Model 3150A Radon Gas Generator – Pylon Check Source | 113 | Yes |
| Ra-226 | 0.00134 uCi | Pylon Model 3150A Radon Gas Generator – Pylon Check Source | 237 | Yes |
| Sr/Y-90 | 0.021 uCi | Sealed source | 99SR4703981 | Yes |
| Th-230 | 0.035 uCi | Sealed source | KR-368 | Yes |

* Yes = A copy of the Source Calibration Certificate is included herein.
No = A copy of the Source Calibration Certificate is being retrieved from Federal Archives in Dayton, OH.

006234

# CERTIFICATE OF CALIBRATION
# RADIUM-226

PYLON MODEL 3150A SERIAL NO. 237

ACTIVE MATERIAL Radium-226 FORM dry powder

HALF-LIFE 1600±7 yr HOUSING steel

DATE OF CALIBRATION 17 June 1998

[ X ] SOURCE ACTIVITY 3010 DPM±4% at 74.5% cpm/dpm

[ ] SOURCE ACTIVITY _____ kBq±4% (0.00134 μCi)

[ ] ACTIVITY DEPOSITED _____ DPM/cm²±4%

[ ] DISPENSED ACTIVITY _____ Bq±4%

## METHOD OF CALIBRATION

[ ] Source calibrated by Alpha Scintillation methods on a Model RM-1003 Radon Gas Monitor against NIST Standards. RM-1003 S/N _____

[ X ] Source calibrated by Alpha Scintillation methods on a Model AB-5 Radon Gas Monitor against NIST Standards. AB-5 S/N 235, 439, 934, 984

[ ] Source assayed by Gamma Spectrometry on a NaI(Tl) detector in conjunction with a Multi-Channel Analyzer against NIST Standards. MCA S/N _____

## ESTIMATED ERROR

$$\text{Error} = \sqrt{e_1^2 + e_2^2} + \text{Error of Reference Standard}$$

Where $e_1$ = Precision of Source Count
$e_2$ = Precision of Standard Count

Laboratory Supervisor — Date 15 September 1998

Quality Control Inspector — Date 15 September 1998

B201203

**PYLON ELECTRONIC DEVELOPMENT company, ltd.**
147 Colonnade Rd., Ottawa, Ontario Canada K2E 7L9

Verified to be a true and official copy
By Wanda Sumner
Date 10-26-06

006234

# CERTIFICATE OF CALIBRATION
# RADIUM-226

PYLON MODEL 3150A Calibration Std SERIAL NO. 113

ACTIVE MATERIAL Radium-226 FORM dry powder

HALF-LIFE 1600±7 yr HOUSING Aluminum

DATE OF CALIBRATION April 9, 1990

[X] SOURCE ACTIVITY 2905 DPM±4% using 76% cpm/dpm

[ ] SOURCE ACTIVITY _____ kBq±4% (0.00134 μCi)

[ ] ACTIVITY DEPOSITED _____ DPM/cm²±4%

[ ] DISPENSED ACTIVITY _____ Bq±4%

## METHOD OF CALIBRATION

[ ] Source calibrated by Alpha Scintillation methods on a Model RM-1003 Radon Gas Monitor against NIST Standards. RM-1003 S/N _____

[X] Source calibrated by Alpha Scintillation methods on a Model AB-5 Radon Gas Monitor against NIST Standards. AB-5 S/N 235,439

[ ] Source assayed by Gamma Spectrometry on a NaI(Tl) detector in conjunction with a Multi-Channel Analyzer against NIST Standards. MCA S/N _____

## ESTIMATED ERROR

$$\text{Error} = \sqrt{e_1^2 + e_2^2} + \text{Error of Reference Standard}$$

Where $e_1$ = Precision of Source Count
$e_2$ = Precision of Standard Count

Laboratory Supervisor — Date April 23, 1990

Quality Control Inspector — Date April 23, 1990

6201205

**PYLON ELECTRONIC DEVELOPMENT company, ltd.**
147 Colonnade Rd., Ottawa, Ontario Canada K2E 7L9

Verified to be a true and official copy
By Wanda Simon
Date 10-6-06

006234

THE SOURCE INCORPORATED

2810 Siler Lane
Santa Fe, NM 87501
(505) 473-9538
FAX: (505) 473-5805

# Certificate of Calibration
## (Beta Source)

The Strontium Yttrium 90 beta source was measured in a gas proportional counter using P-10 as counting gas. The beta emissions from the surface of the source were measured at its plateau voltage to determine its 2π particle emission rate (i.e. particles per minute). Corrections were applied for background, coincidence loss and backscatter factors when applicable.

Beta standard 98SR3201038 is our NIST calibrated source used in establishing NIST traceability following ANSI N42.22 participating in the NIST radioactivity measurement assurance program annually.

REF.PO# 00SC00017600000

Model S-Sr-47

Active Diameter (or area) 44mm  Mounting Material SS

Total Diameter (or area) 47mm  Thickness 0.79mm

| | | | | |
|---|---|---|---|---|
| 32,700 | ppm ± | 1,635 | ppm 2π | |
| 46,800 | dpm ± | 2,340 | dpm 4π | |
| 0.0211 | uCi | | Bq | |
| 12/11/99 | date of measurement | | | |
| 99SR4703981 | source serial number | | | |
| 5.0 | overall uncertainty (percent) | | | |
| 40 | backscatter (percent) | | | |

Michael A. Ortiz . . . . Calibration Manager

Vera Padilla . . Quality Control

<2200 dpm leak test results (dpm/100cm²)

The overall uncertainty of the measurement is three times the value found from combining quadratically the sum of the overall uncertainty reported by NIST in the radioactive measurements assurance program; the standard deviation of the mean for the NIST standard as measured in the system used for calibration; and the standard deviation of the mean for the source measurements.

AC006-97

Verified to be a true and official copy
By Wanda Summers
Date 10-26-06

AEA TECHNOLOGY QSA

006234

**AEA Technology QSA GmbH**

Gieselweg 1
38110 Braunschweig
Postfach 58 42
38049 Braunschweig
Germany
Tel. +49 (0) 5307 932-0
Fax +49 (0) 5307 932-194

10 June 2002

# CERTIFICATE

# No. CO 52484 – KR 368

for a Sealed Radioactive Source

## Source Type: Alpha Wide Area Reference Source

| | |
|---|---|
| Product code | TZR03021 |
| Drawing | VZ-1368 |
| Dimensions of active surface | Ø 36 mm |
| Overall dimensions | Ø 47 mm x 3 mm |
| Source no. | KR 368 |
| Nuclide | Thorium-230 |

## Measurement Data

| | |
|---|---|
| Activity | 1.29 kBq |
| Uncertainty* | 6 % |
| Alpha surface emission rate | 631 $s^{-1}$ in 2 $\pi$ steradian |
| Uncertainty* of alpha surface emission rate | 3 % |
| Reference date | 23 May 2002 |
| Traceability* | Defined on page 2 |

## Leakage and Contamination Test/s

| | |
|---|---|
| Test method/s* | I |
| Test/s passed on | 3 June 2002 |

## Additional Information

| | |
|---|---|
| ISO classification* | C.34645 |
| Remark | --- |

* see page 2 for explanation

**AEA Technology QSA GmbH**

i.A. [signature]
(Production Manager)

Verified to be a true and official copy
By Wanda Summer
Date 10-26-06

12032002 im 20.000aea/bl.

AEA Technology QSA GmbH
Sitz Braunschweig, Registergericht
Braunschweig, HRB 4647

Geschäftsführer:
Dr. Rainer Lambrich

Commerzbank, Braunschweig
BLZ 270 400 80
Konto 5302591

AEA Technology plc
329 Harwell, Didcot, Oxfordshire OX11 0QJ.
Registriert in England und Wales, Nr. 3095862

# Explanations for Certificates (Page 2 of Certificates)

006234

## Uncertainty

The reported uncertainty is based on standard uncertainty multiplied by a coverage factor k = 2, providing a level of confidence of approximately 95 %. (ISO Guide, 1995)

## Traceability

This certificate documents the traceability of measurement results to national standards, standard measuring equipment and methods for the realisation of physical units of measurement according to the International System of Units (SI).
Traceability is defined as 'the property of a result of a measurement whereby it can be related to appropriate standards, generally international or national standards, through an unbroken chain of comparisons'.

AEA Technology QSA GmbH has been accredited as DKD (Deutscher Kalibrierdienst) calibration laboratory by the Physikalisch-Technische Bundesanstalt (PTB) and is authorized to issue reference sources which are traceable to national standards held at the PTB in Germany.
Because of the European co-operation for Accreditation (EA) mutual recognition agreement the certificates are also accepted by all EA-members (e. g. NAMAS, UK).

This product complies with the requirements for traceability to NIST specified in the American National Standard "Traceability of Radioactive Sources to the NIST and Associated Instrument Quality Control (ANSI N42.22-1995)".
As a requirement for the ANSI N42.22-1995 AEA Technology QSA participates in the NEI/NIST Measurements Assurance Pro-gram of the Nuclear Power Industry.

## Leakage and contamination tests

Stringent tests for leakage are an essential feature of radioactive sources production. They are based on ISO 9978. Some standard methods used for testing radiation sources are listed below.

### Wipe test I

The source is wiped with a swab or tissue, moistened with ethanol or water, the activity removed is measured.
Limit: 185 Bq

### Immersion test II

The source is immersed in a suitable liquid at 50 °C for at least 4 hours and the activity removed is measured.
Limit: 185 Bq

### Bubble test III

The source is immersed in water or a suitable liquid and the pressure in the vessel reduced to 13 kPa (100 mm Hg). No bubbles must be observed.
(This test conforms to ISO 9978 except that for some sources, the 100 mm³ free volume requirement is not met.)

### Emanation test IV

The source is placed in a gas tight enclosure with activated carbon as absorber and is left there for at least 3 h. The source is considered leak tight when not more than 185 Bq Radon related to a collection time of 12 h can be measured afterwards.

## ISO classification

The International Organization for Standardization (ISO) has proposed a system of classification of sealed radioactive sources based on safety requirements for typical uses (see ISO 2919). This system provides a manufacturer of sealed radioactive sources with a set of tests to evaluate the safety of his products. It also assists a user of such sealed sources to select types which suit the application he has in mind. The tests to which specimen sources are subjected are listed in the following table.

### Classification of sealed source performance standard according to ISO 2919

| | Class 1 | 2 | 3 | 4 | 5 | 6 | X |
|---|---|---|---|---|---|---|---|
| **Temperature** | No test | - 40 °C (20 min) + 80 °C (1 h) | - 40 °C (20 min) + 180 °C (1 h) | - 40 °C (20 min) + 400 °C (1 h) and thermal shock 400 °C to 20 °C | - 40 °C (20 min) + 600 °C (1 h) and thermal shock 600 °C to 20 °C | - 40 °C (20 min) + 800 °C (1 h) and thermal shock 800 °C to 20 °C | Special test |
| **External Pressure** | No test | 25 kPa absolute | 25 kPa absolute to 2 MPa absolute | 25 kPa absolute to 7 MPa absolute | 25 kPa absolute to 70 MPa absolute | 25 kPa absolute to 170 MPa absolute | |
| **Impact** | No test | 50 g from 1 m | 200 g from 1 m | 2 kg from 1 m | 5 kg from 1 m | 20 kg from 1 m | |
| **Vibration** | No test | 3 x 10 min 25 - 500 Hz at 5 g peak amplitude | 3 x 10 min 25 - 50 Hz at 5 g peak amplitude and 50 - 90 Hz at 0.635 mm amplitude peak to peak and 90 - 500 Hz at 10 g peak amplitude | 3 x 30 min 25 - 80 Hz at 1.5 mm amplitude peak to peak and 80 - 2000 Hz at 20 g peak amplitude | | | |
| **Puncture** | No test | 1 g from 1 m | 10 g from 1 m | 50 g from 1 m | 300 g from 1 m | 1 kg from 1 m | |

## Special applications

No test programme can cover all possible combinations of environments to which a source may be exposed.
Users should therefore consult our experts before using sources in potentially adverse environments.

## IAEA Special Form

'Special Form' is a test specification for sealed sources given in the IAEA transport regulations (IAEA Safety Series No. 6, 1985, revised edition).
It is used in determining the maximum acceptable activities for various types of transport containers.

## Quality assurance System

The quality assurance system of AEA Technology QSA GmbH was certified by Lloyd's Register Quality Assurance (LRQA) according to ISO 9001, issue 1994. Isotrak products meet the requirements of 10CFR50 Appendix B.

Verified to be a true and official copy
By Wanda Sumner
Date 10-26-06



AEA TECHNOLOGY QSA

# Handling Instructions for Radiation Sources

006234

## 1 Introduction

This document gives guidance information regarding the safe and proper use of Radiation Sources. It is most important that they are followed at all times. Where they exist, relevant local and national regulations and codes of practice and transport regulations must be adhered to.

## 2 Warnings

Radiation sources emit potentially harmful radiation. If damaged or misused potentially dangerous radioactive material may be released.

Radiation sources should only be handled and used under the supervision of authorised competent persons.

These Handling Instructions must be adhered to at all times and AEA Technology QSA must be consulted if sources are to be used outside agreed conditions. If the source is accidentally exposed outside these conditions again AEA Technology QSA should be notified together with any relevant local regulatory authority.

## 3 Receipt

Check that all documentation corresponds to the goods actually received. If there are any anomalies please notify AEA Technology QSA or its representatives as soon as possible.

Notify the local health physicist or other authorised competent person that the package has arrived.

If the package is not to be opened immediately, a suitable and secure store must be provided. This store should be reserved for radioactive materials only and must be adequately shielded and labelled.

## 4 Unpacking

The package should be inspected on arrival and if any damage is observed which could have resulted in damage to the product the package must not be opened. It should be made safe and the matter reported immediately to the local competent authority and also to AEA Technology QSA.

Suitable radiation monitoring instruments should be available to check dose rates while unpacking Radiation Sources.

If there any doubts about how to proceed, please contact AEA Technology QSA via its representatives for further information.

The actual products should be unpacked in designated areas by an authorised competent person.

## 5 Inspection

Taking care to restrict personnel dose levels by the use of suitable shielding the sources should be inspected immediately following removal from the inner container, if possible. Any damage or other causes for concern should be reported to AEA Technology QSA without delay.

## 6 Testing and Feedback

All Radiation Sources supplied by AEA Technology QSA are manufactured and tested to the highest standard. The tests employed on any particular batch, which are always in accordance with international standards (e. g. IAEA Safety Series 6, ISO 2919) are given on an official Test Report issued with all sources, or batches of sources.

Unless specifically requested, the sources are designed, manufactured and tested assuming that they are not to be used or stored in extreme or cyclic corrosive, thermal or mechanical conditions.

If they are to be used in such conditions or if the source has been accidentally exposed to extreme conditions, advice must be sought immediately from AEA Technology QSA.

Sources must not in any way be modified or reworked, as this could be dangerous.

AEA Technology QSA would be pleased to receive any information regarding the performance of their sources in use and to give advice on Recommended Working Lives and also to consider requests for advice on source disposal.

Where sources are re-sold, incorporated into other products or transferred in any other way, it is the responsibility of AEA Technology QSA's customer to ensure that all subsequent users are made aware of the nature of the radiation source and its specified use, and he must include appropriate warnings in the literature he sends out or include copies of these Handling Instructions with the final package.

## 7 Source handling with other devices

If radiation sources have to be mounted or inserted into devices (e. g. using additional source holders) the operating instructions of the device manufacturer must be followed.

## 8 Additional Information

A. In some sources (e.g. reference sources) the radioactive material may be sealed by a very thin inactive surface. The sources therefore must always be handled carefully to prevent surface damage and subsequent loss of radioactive material.

B. There is always a risk of contamination when using Unsealed Radioactive Material/Sources. It is important that the material is only handled in an approved enclosure, in a designated area, and all operations are under the supervision of an authorised competent person.
Checks for contamination should be regularly carried out.

C. In many cases unprocessed radiochemical are despatched in the same aluminium cans in which they are irradiated.
The cans themselves may therefore still contain some residual radioactivity and may give rise to contamination. Such cans should be treated as radioactive items, even when empty.

Verified to be a true
and official copy
By Wanda Simon
Date 10-26-06



AEA TECHNOLOGY QSA

# Enclosure C

Enclosure C consists of copies of removable contamination surveys (leak tests) of the following sources conducted on October 26 and 27, 2006:

**Radioactive Sources**

| Isotope | Activity | Description | Serial/ID Number |
|---|---|---|---|
| Cs-137 | 0.936 uCi | Sealed Button Source | 405-60-14 |
| Ra-226 | 0.00134 uCi | Pylon Model 3150A Radon Gas Generator – Pylon Check Source | 113 |
| Ra-226 | 0.00134 uCi | Pylon Model 3150A Radon Gas Generator – Pylon Check Source | 237 |
| Sr/Y-90 | 0.021 uCi | Sealed source | 99SR4703981 |
| Th-230 | 0.035 uCi | Sealed source | KR-368 |

006234

| FEMP COVER SHEET | | SURVEY NUMBER 06-10-12-129 |
|---|---|---|
| DATE 10-27-06 | RCT PRINT Ricky Jennings | PAGE 1 of 2 |
| TIME 1200 | SIGNATURE Ricky Jennings | BADGE # [redacted] |
| RWP NUMBER | REVIEWER PRINT Ken Zahit | DATE 10-27-06 |
| NA | SIGNATURE Ken Zahit | BADGE # [redacted] |

**LOCATION:** DELTA ~~UNO~~ 7 BLDG

| REASON FOR SURVEY | CHECK TWO RA-226 SOURCES FOR REMOVABLE CONTAMINATION |
|---|---|

SUMMARY:

USED 2929 FOR SURVEY BETA ALPHA

LEAK CHECK SOURCES

FS-F-4617
REV. 2 (CA 01/99, RF-0033)

COPY

SURVEY NUMBER: 06-10-12-129 PAGE 2 OF 2

| DATE: | RCT PRINT: | RCT SIGNATURE: | BADGE #: |
|---|---|---|---|
| 10-27-06 | Ricky Jennings | Ricky Jennings | [redacted] |
| DATE REVIEWED: | REVIEWED BY (PRINT): | REVIEWED BY (SIGNATURE): | |
| 10-27-06 | Ken Zahnt | Ken Zahnt | |

| MODEL | SERIAL NUMBER | TYPE (α, β, γ) | CALIBRATION DUE DATE | BKGD (cpm) | EFF./CF | COUNT TIME (min) | MDA (dpm) | INSP./ PERFORMANCE TEST SAT? YES | NO |
|---|---|---|---|---|---|---|---|---|---|
| 2929 | 158799 | αβ | 11-06 | 1.8/38.4 | .322/.330 | .5 | 10/42 | ✓ | NA |
| NA | NA | NA | NA | NA | NA | NA | NA | NA | |

| ITEM NUMBER | LOCATION AND/OR DESCRIPTION | DPM/100cm² ALPHA REMOVABLE (1) | DPM/100cm² ALPHA FIXED PLUS REMOVABLE | DPM/100cm² BETA-GAMMA REMOVABLE (1) | DPM/100cm² BETA-GAMMA FIXED PLUS REMOVABLE | CORRECTED DOSE RATE (MREM/HR) γ CONTACT | β CONTACT | γ AT __ FT | β AT __ FT |
|---|---|---|---|---|---|---|---|---|---|
| | RA 226 SOURCES | | | | | | | | |
| 1 | SOURCE # 113 | LMDA | NA | LMDCR | NA | | | | |
| 2 | | LMDA | | LMDCR | | | | | |
| 3 | SOURCE # 237 | LMDA | | LMDCR | | | | | |
| 4 | | LMDA | | LMDCR | | | | | |
| NA | | | | | | | | | |

NA

Note (1): Values identified by an asterisk (*) indicate results are less than the calculated MDA.

COPY

006234

**Fluor Fernald, Inc.**
P.O. Box 538704
Cincinnati, OH 45253-8704

(513) 648-3000

**FLUOR**

October 27, 2006

Subject: **AUTHORIZATION TO ACQUIRE, RECEIVE, TRANSFER, POSSESS, AND/OR USE RADIOACTIVE MATERIAL AT/BY/OR FROM THE DEPARTMENT OF ENERGY (DOE) FERNALD CLOSURE PROJECT (FCP)**

**TO WHOM IT MAY CONCERN:**

In regard to "licensure concerns" (i.e., requests for copies of applicable Nuclear Regulatory Commission [NRC] licenses, Agreement State licenses, and/or State registrations):

1. NRC regulations specifically exempt DOE Prime Contractors from requirements for an NRC radioactive material license (see **10 CFR 30.12**, Byproduct Material; **10 CFR 40.11**, Source Material; and **10 CFR 70.11**, Special Nuclear Material, for specific "Exemptions to Licensing Under Certain Department of Energy and Nuclear Regulatory Commission Contracts");

2. The State of Ohio, an NRC Agreement State, specifically exempts DOE Contractors from State licensure to the extent that such contractor, under its prime contract with the DOE, manufactures, produces, transfers, receives, acquires, owns, possesses, or uses byproduct material for, in part, the performance of work for the DOE at a United States government-owned or controlled site, including the transportation of radioactive material to or from such site [see Ohio Administrative Code, **Rule 3701:1-40-06**, Department of Energy Contractors].

3. For the purposes of "evidence of licensure," we provide the following:

   Fluor Fernald, Inc. is a DOE Prime Contractor (for the Fernald Closure Project), exempted from NRC and/or State licensure and/or registration for the receipt, possession, transfer, and/or use of radioactive material and radiation-generating devices. The authority for such possession and use is derived of **DOE Contract Number DE-AC24-01OH20115**.

Should you have questions in regard to the above, please contact me at **(513) 648-4318** or via e:mail at robert.burgin@fernald.gov.

Sincerely,

Robert E. Burgin

Robert E. Burgin, Sr. Health Physicist
Radiological Compliance Manager
Site Radiation Source Controller
Fernald Closure Project

**Enclosure D**