

## **Pensacola Testing Laboratories, Inc.**

217 East Brent Lane, Pensacola, FL 32503

Phone (850) 477-5100 - Fax (850) 477-1310

January 26, 2000

United States Nuclear  
Regulatory Commission  
Region II  
Sam Nunn Atlanta  
Federal Center  
61 Forsyth Street, Southwest  
Suite #23T85  
Atlanta, GA 30303-8931

Attn.: Ms. Diane Heim

Re: NRC Reciprocity, State of Florida  
License No. 1176-1

Ms. Heim:

Please find attached the required information and fee in connection with the referenced subject. Thank you for your assistance in this matter.

Sincerely,

Pensacola testing Laboratories, Inc.



Patrick A. Wheeler, President/RSO

**Excerpt from § 170.31 Schedule of fees for materials licenses and other regulatory services, including inspections, and import and export licenses.**

Applicants for materials licenses, import and export licenses, and other regulatory services and holders of materials licenses, or import and export licenses shall pay fees for the following categories of services. This schedule includes fees for health and safety and safeguards inspections where applicable.

16. Reciprocity:		
	Agreement State licensees who conduct activities under the reciprocity provisions of 10 CFR 150.20.	
	Application (initial filing of Form 241)	\$1,200.
	Revisions	\$200.



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
REGION II  
SAM NUNN ATLANTA FEDERAL CENTER  
61 FORSYTH STREET, SW. SUITE 23T85  
ATLANTA, GEORGIA 30303-8931

December 22, 1999

Pensacola Testing Laboratories  
ATTN: Patrick A. Wheeler, RSO  
217 East Brent Lane  
Pensacola, FL 32503

SUBJECT: NRC RECOGNITION OF AGREEMENT STATE RADIOACTIVE MATERIAL  
LICENSES

Dear Mr. Wheeler:

Agreement State licensees seeking to conduct activities under reciprocity for the first time in Calendar Year 2000, must submit NRC Form 241, "Report of Proposed Activities in Areas of Exclusive Federal Jurisdiction, Non-Agreement States, and Offshore Waters"; four copies of the Agreement State specific license; and the fee specified in fee Category 16, 10 CFR 170.31. NRC should receive this filing at least 3 days before the licensee engages in activities permitted under the General License established by 10 CFR 150.20. The licensee is also required to submit revisions and/or clarifications if applicable. Enclosed are NRC Form 241, which includes instructions and 10 CFR 150.20, and the current fee schedule.

Under the general license, licensees conducting reciprocity activities are limited to a total of 180 days of usage, including storage, in calendar year 2000. Reciprocity activities conducted in offshore waters are not subject to the 180-day limit.

Agreement State licensees operating under reciprocity must conduct activities involving radioactive materials in accordance with the conditions specified in the licensee's Agreement State license, representations made in NRC Form 241, and other rules, regulations, and orders of NRC. Failure to comply with these regulations before operating under reciprocity may result in NRC enforcement actions. Such actions could include the issuance of a notice of violation, the proposed imposition of a civil penalty, or an order suspending, modifying, or revoking the license.

If you have any questions about the regulations or the application process, please feel free to contact me at (404) 562-4723 or facsimile at (404) 562-4900.

Sincerely,

A handwritten signature in cursive script that reads "Diane M. Heim".

Diane M. Heim, Materials Licensing Assistant  
Division of Nuclear Materials Safety

Enclosures: 1. NRC Form 241  
2. Excerpt from 10 CFR 170.31

**REPORT OF PROPOSED ACTIVITIES IN  
 NON-AGREEMENT STATES, AREAS OF EXCLUSIVE  
 FEDERAL JURISDICTION, OR OFFSHORE WATERS**

*(Please read the instructions before completing this form)*

1. NAME OF LICENSEE (Person or firm proposing to conduct the activities described below) Pensacola Testing Laboratories, Inc		2. TYPE OF REPORT <input checked="" type="checkbox"/> INITIAL <input type="checkbox"/> REVISION <input type="checkbox"/> CLARIFICATION	
3. ADDRESS OF LICENSEE (Mailing address or other location where licensee may be located) 217 East Brent Lane Pensacola, FL 32503		4. LICENSEE CONTACT AND TITLE Patrick A. Wheeler, President	
		5. TELEPHONE NUMBER (Include Area Code) 850-477-5100	6. FACSIMILE NUMBER (Include Area Code) 850-477-1310

7. ACTIVITIES TO BE CONDUCTED UNDER THE GENERAL LICENSE GIVEN IN 10 CFR 150.20

WELL LOGGING  LEAK TESTING AND/OR CALIBRATIONS  THERAPY/IRRADIATOR SERVICE

PORTABLE GAUGES  OTHER (Specify) ⇒ \_\_\_\_\_

RADIOGRAPHY ⇒ REGISTERED AS USER OF PACKAGING (CERTIFICATES OF COMPLIANCE NUMBERS)

8. CLIENT NAME, ADDRESS, CITY/COUNTY, STATE, ZIP CODE See Attachment	9. ACTUAL PHYSICAL ADDRESS OF WORK LOCATION (Street and Number or other location. Give as complete an address or directions as possible.) See Attachment
10. CLIENT TELEPHONE NUMBER (Include Area Code) See Attachment	11. WORK LOCATION TELEPHONE NUMBER (Include Area Code) See Attachment

12. DATES SCHEDULED		13. NUMBER OF WORK DAYS	14. ADD	15. DELETE	16. LOCATION REFERENCE NUMBER
FROM	TO	See Attachment			NUMBER TO BE ASSIGNED BY NRC
See Attachment	See Attachment	Attachment			

LIST ADDITIONAL WORK SITES ON SEPARATE SHEET(S) TO INCLUDE ALL INFORMATION CONTAINED IN ITEMS 9-16 ABOVE.

17. LIST RADIOACTIVE MATERIAL, WHICH WILL BE POSSESSED, USED, INSTALLED, SERVICED, OR TESTED (Include description of type and quantity of radioactive material, sealed sources, or devices to be used.)

CS-137 (up to 10 Mci) AM241:Be (up to 50 Mci)

18. AGREEMENT STATE SPECIFIC LICENSE WHICH AUTHORIZES THE UNDERSIGNED TO CONDUCT ACTIVITIES WHICH ARE THE SAME, EXCEPT FOR LOCATION OF USE, AS SPECIFIED IN ITEM 9 ABOVE. (Four copies of the specific license must accompany the initial NRC Form 241.)	LICENSE NUMBER 1176-1	STATE FL	EXPIRATION DATE 12-21-2001
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19. CERTIFICATION (MUST BE COMPLETED BY APPLICANT)

I, THE UNDERSIGNED, HEREBY CERTIFY THAT:

- All information in this report is true and complete.
- I have read and understand the provision of the general license 10 CFR 150.20 reprinted on the instructions of this form; and I understand that I am required to comply with these provisions as to all byproduct, source, or special nuclear material which I possess and use in non-Agreement States or offshore waters under the general license for which this report is filed with the U.S. Nuclear Regulatory Commission.
- I understand that activities, including storage, conducted in non-Agreement States under general license 10 CFR 150.20 are limited to a total of 180 days in calendar year. With the exception of work conducted in off-shore waters, which is authorized for an unlimited period of time in the calendar year.
- I understand that I may be inspected by NRC at the above listed work site locations and at the Licensee home office address for activities performed in non-Agreement States or offshore waters.
- I understand that conduct of any activities not described above, including conduct of activities on dates or locations different from those described above or without NRC authorization, may subject me to enforcement action, including civil or criminal penalties.

CERTIFYING OFFICER - RSO or Management Representative (Name and Title) Patrick A. Wheeler, President/RSO	SIGNATURE <i>Patrick A. Wheeler</i>	DATE 12-29-99
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WARNING: False statements in this certificate may be subject to civil and/or criminal penalties. NRC regulations require that submissions to the NRC be complete and accurate in all material respects. 18 U.S.C. Section 1001 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.

FOR NRC USE ONLY	REVIEWING OFFICIAL (Typed/Printed Name and Title)	SIGNATURE	DATE	TOTAL USAGE -- DAYS TO DATE
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**PENSACOLA TESTING LABORATORIES, INC.**

217 East Brent Lane, Pensacola, FL 32503

Phone (850) 477-5100 - Fax (850) 477-1310

**ATTACHMENT TO NRC FORM 241**

This list is in reference to boxes 9, 10, 11, 12, 13, 14, and 15 on NRC Form 241. Dates, times, and Clients are not prearranged at this time. Pensacola Testing Laboratories, Inc. may perform portable gauge work at the following federal work sites:

- |                             |                      |
|-----------------------------|----------------------|
| 1. Pensacola NAS            | Pensacola, FL        |
| 2. Whiting Field            | Milton, FL           |
| 3. Eglin AFB                | Ft. Walton Beach, FL |
| 4. Coastal Systems Station  | Panama City, FL      |
| 5. Pascagoula Naval Station | Pascagoula, MS       |
| 6. Corry Field              | Pensacola, FL        |
| 7. Saufley Field            | Pensacola, FL        |
| 8. Tyndall AFB              | Panama City, FL      |
| 9. US Coast Guard Station   | Pensacola, FL        |
| 10. US Coast Guard Station  | Mobile, AL           |
| 11. US Coast Guard Station  | Panama City, FL      |

**STATE OF FLORIDA  
DEPARTMENT OF HEALTH  
BUREAU OF RADIATION CONTROL**

**RADIOACTIVE MATERIALS LICENSE**

Pursuant to Chapter 404, Florida Statutes, and Chapter 10D-91, Florida Administrative Code (F.A.C.), and in reliance on statements and representations heretofore made by the licensee designated below, a license is hereby issued authorizing such licensee to receive, acquire, possess and transfer the radioactive material(s) designated below and to use such radioactive material(s) for the purpose(s) and at the place(s) designated below. This license is subject to all applicable rules, regulations and orders of the state of Florida, Department of Health now or hereafter in effect and to any conditions specified below.

<p style="text-align: center;">Licensee</p> <p>1. Name: <b>PENSACOLA TESTING LABORATORIES, INC.</b></p>	<p>With reference to application dated November 26, 1996, State of Florida Radioactive Materials</p> <p>3. License Number: <b>1176-1</b> is hereby renewed in its entirety to read as follows:</p>
<p>2. Address: <b>217 East Brent Lane Pensacola, FL 32503</b></p>	<p>4. Expiration Date: <b>12/21/2001</b></p> <p>5. Category: <b>3L(I)</b></p>

6. Radioactive material (element and mass number)	7. Chemical and/or physical form	8. Maximum quantity licensee may possess at any one time
A. Cesium 137	A. Sealed source (Troxler Electronic Laboratories, Inc. Drawing Number A-102112)	A. 4 sources; not to exceed 9 millicuries each
B. Americium 241: beryllium	B. Sealed source (Troxler Electronic Laboratories, Inc. Drawing Number A-102451)	B. 4 sources; not to exceed 44 millicuries each
C. Cesium 137	C. Sealed source (Boart Longyear Company CPN Products [formerly CPN Co.] Model CPN-131)	C. 1 sources; not to exceed 10 millicuries each
D. Americium 241: beryllium	D. Sealed source (Boart Longyear Company CPN Products [formerly CPN Co.] Model CPN-131)	D. 1 sources; not to exceed 50 millicuries each

STATE OF FLORIDA  
DEPARTMENT OF HEALTH  
BUREAU OF RADIATION CONTROL

9. AUTHORIZED USES

- A. and B. To be used in Troxler Electronic Laboratories, Inc. Model 3400 Series moisture/density gauges to measure properties of construction materials or soils.
- C. and D. To be used in Boart Longyear Company CPN Products (formerly CPN Company) Model MC Series moisture/density gauges to measure properties of construction materials or soils.

CONDITIONS

10. A. The authorized place of use shall be temporary job sites of the licensee throughout the state of Florida. This condition does not prohibit use in other agreement states and states under the jurisdiction of the U.S. Nuclear Regulatory Commission (NRC) under reciprocity which has been approved by an agreement state or the NRC.
- B. The authorized place of storage shall be at licensee's facility located at the address in Item 2.
11. Failure to comply with the provisions of this license is a felony of the third degree pursuant to section 404.161, Florida Statutes. Also, violations may warrant an administrative fine of up to \$1,000.00 per violation per day, pursuant to section 404.162, Florida Statutes.
12. A. Licensed materials shall be used by, or under the supervision and in the physical presence of, individuals who have successfully completed a training program for gauge users accepted by the department. The licensee shall maintain documentation of training, to include valid training certificates, of each user for the duration of employment of the individual or 5 years, whichever is greater.
- B. The radiation safety officer is Patrick A. Wheeler.
13. The licensee shall comply with the provisions of Chapter 10D-91, F.A.C., Part X, "Notices, Instructions and Reports to Workers; Inspections" and Part IV, "Standards for Protection Against Radiation."
14. The licensee shall not transfer possession or control of radioactive material, or products containing radioactive material as a contaminant except:
- A. By transfer to a specifically licensed recipient; or
- B. As provided otherwise by specific provision of his license pursuant to the requirements of Chapter 10D-91, F.A.C.

License Number: 1176-1  
Amendment No.: 8  
Control Number: 961127-1319

LICENSEE COPY

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Category: [3L(I)]

Expiration Date: 12/21/2001

STATE OF FLORIDA  
DEPARTMENT OF HEALTH  
BUREAU OF RADIATION CONTROL

15. Radioactive material transported on public thoroughfares shall be packaged, prepared for shipment and transported in accordance with Title 49, Code of Federal Regulations and Chapter 10D-91, F.A.C.
16. The licensee shall assure that each sealed source is tested for leakage or contamination and follow the appropriate actions as required by section 10D-91.1404, F.A.C. Licensed material shall be tested at least semiannually, except Items 6,7,8, and 9, Subitems C and D shall be tested annually. The test sample (smear) shall be taken by the licensee using an approved leak test kit. Analysis of the test sample shall be performed by individuals who are licensed by the department, NRC, agreement state, or licensing state to provide these services. The licensee is required to retain leak test records containing the manufacturer's name, model and serial number of each sealed source tested, identity of each sealed source radionuclide and its estimated activity, the measured activity of each test sample expressed in microcuries, the date of the test and signature of the radiation safety officer or designee. The records shall be maintained for 3 years for inspection by the department.
17. The licensee shall conduct a physical inventory and inspection at least semiannually to account for all sealed sources received and possessed under this license as required by section 10D-91.1405, F.A.C. Inventory records shall be maintained for 3 years from the date of the inventory for inspection by the department, and shall include the manufacturer's name, model and serial numbers of each sealed source, the identity of each sealed source radionuclide and its estimated activity, the location of each sealed source, the date of the inventory and the signature of the radiation safety officer or designee.
18. A. Except as specifically provided otherwise by this license, the licensee shall possess and use licensed material described in Items 6, 7, 8, and 9 of this license in accordance with statements, representations and procedures contained in the licensee's application dated November 26, 1996, signed by Patrick A. Wheeler, President, and correspondence dated February 6, 1997, also signed by Patrick A. Wheeler, President.

License Number: 1176-1  
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STATE OF FLORIDA  
DEPARTMENT OF HEALTH  
BUREAU OF RADIATION CONTROL

18. B. The licensee shall comply with all applicable requirements of Chapter 10D-91, Florida Administrative Code, and these regulations shall supersede the licensee's statements in applications or correspondence, unless the statements are more restrictive than the regulations.

For the Bureau of Radiation Control

Issuance Date: FEB 20 1997

*Debbie Bray Gilley*  
Debbie Bray Gilley  
Health Physicist  
1317 Winewood Boulevard  
Tallahassee, FL 32399-0700  
(904) 487-2437

License Number: 1176-1  
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Category: [3L(I)]

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Expiration Date: 12/21/2001