

PONTIFICAL CATHOLIC UNIVERSITY OF PUERTO RICO
2250 AVE. LAS AMÉRICAS, SUITE 570
PONCE, P.R. 00717-9997



PHONE: 841-2000
EXT. 1350
FAX: (787) 840-4295

BIOLOGY DEPARTMENT

Ms 16
J-6

August 22, 2007

Ms. Betsy Ullrich
Senior Health Physicist
Commercial and R&D Branch
Division of Nuclear Materials Safety
Nuclear Regulatory Commission
475 Allendale Road
King of Prussia, Pennsylvania 19405-1415

2007 AUG 27 PM 12: 26
RECEIVED
REGION 1

SUBJECT: ADDITIONAL INFORMATION CONCERNING APPLICATION FOR AMENDMENT TO LICENSE, CONTROL NO. 139009

Dear Ms. Ullrich:

03019921

In reference to your letter dated July 25, 2007, we are sending you the information you requested in order to complete the information concerning application for termination of the license no. 52-13508-03, control no. 139009.

1. You are correct, the solid waste materials from the activities authorized by the license were disposed in March 2004 by Clean Harbors and Ecology Services. (See the documents attached.)
2. The radiation detector survey for both rooms Fe-119 and Fe-120 was made on March 26, 2007 by Mr. Daniel Torres, Health Physicist. The survey indicates only background readings. (See attached results.)
 - a. Both rooms, Fe-119 and Fe-120, were washed and painted after termites attacked to the Ferré building years ago. We no longer have hoods nor working benches on any room. Fe-119 was redesigned to be a professor's office. In room Fe-120 are [REDACTED] a sink, a table and two archives.
3. The records of the material that was disposed to the sewer before 1985 were destroyed by the termites. The few records available that survived the termites are not related to those events. Evidence of the documents destruction was verified by NCR personnel on their inspection on August, 2006.

139009

NMSS/RGN1 MATERIALS-002

Ms. Betsy Ullrich

August 22, 2007

Page 2

4. The Pontifical Catholic University is located in a residential/commercial area, but the nearest building of the community to Ferré is about 250m away and they are not part of the PCUPR. (See the maps attached.)
5. Ferré is a two store L-shape building of 13,274 square feet (See the map attached.)

Sincerely yours,



Carmen I. Asencio

Radiation Safety Officer

SAFETY INSPECTION REPORT AND COMPLIANCE INSPECTION

| | |
|---|--|
| 1. LICENSEE/LOCATION INSPECTED: <i>Catholic University</i> <i>Ponce, PR</i> REPORT <i>1006-NDV</i> | 2. NRC/REGIONAL OFFICE REGION I US NUCLEAR REGULATORY COMMISSION 475 ALLENDALE ROAD KING OF PRUSSIA, PENNSYLVANIA 19406-1415 |
|---|--|

| | | |
|--|---|--|
| 3. DOCKET NUMBER(S) <i>30-19921</i> | 4. LICENSEE NUMBER(S) <i>52-13508-03</i> | 5. DATE(S) OF INSPECTION <i>3/23/06</i> |
|--|---|--|

LICENSEE:

The inspection was an examination of the activities conducted under your license as they relate to radiation safety and to compliance with the Nuclear Regulatory Commission (NRC) rules and regulations and the conditions of your license. The inspection consisted of selective examinations of procedures and representative records, interviews with personnel, and observations by the inspector. The inspection findings are as follows:

1. Based on the inspection findings, no violations were identified.

2. Previous violation(s) closed.

3. The violation(s), specifically described to you by the inspector as non-cited violations, are not being cited because they were self-identified, non-repetitive, and corrective action was or is being taken, and the remaining criteria in the NRC Enforcement Policy, NUREG-1600, to exercise discretion, were satisfied.

_____ Non-Cited Violation(s) was/were discussed involving the following requirement(s) and Corrective Action(s):

4. During this inspection certain of your activities, as described below and/or attached, were in violation of NRC requirements and are being cited. This form is a NOTICE OF VIOLATION, which may be subject to posting in accordance with 10 CFR 19.11.

(Violations and Corrective Actions)

Licensee's Statement of Corrective Actions for Item 4, above.

I hereby state that, within 30 days, the actions described by me to the inspector will be taken to correct the violations identified. This statement of corrective actions is made in accordance with the requirements of 10 CFR 2.201 (corrective steps already taken, corrective steps which will be taken, date when full compliance will be achieved). I understand that no further written response to NRC will be required, unless specifically requested.

| Title | Printed Name | Signature | Date |
|---------------------------|------------------------|------------------------|----------------|
| LICENSEE'S REPRESENTATIVE | | | |
| NRC INSPECTOR | <i>Hector Bermudez</i> | <i>Hector Bermudez</i> | <i>3/23/06</i> |



CHAIN OF CUSTODY

10220 Old Columbia Road
Columbia, Maryland 21046
410-381-2600
800-932-7299
Fax 410-381-2602

SAMPLE GENERATOR INFORMATION

| | | | |
|---------------------|-------------|--------------------------------|---------|
| NAME: | | Pontifica Universidad Católica | |
| LOCATION (CITY/ST): | | PONCE, PR | |
| SAMPLE TYPE: | | SOLID | |
| AMOUNT COLLECTED: | 4 (lbs) | TIME COLLECTED: | 2:30 |
| COLLECTOR'S NAME: | GREG HOWETT | DATE COLLECTED: | 4-13-04 |

FIELD INFORMATION - SPECIAL INSTRUCTIONS

| |
|-----------------------------|
| Packaged and shipped by ESI |
| |
| |
| |

CHAIN OF POSSESSION

| | | | |
|---------------|-----------------------|---------------|--|
| ORIGIN | PUCPR | ACCEPTED BY | |
| NAME: | Hilda Santiago | NAME: | |
| SIGNATURE: | <i>Hilda Santiago</i> | SIGNATURE: | |
| DATE: | 4/13/04 | DATE: | |
| ORGANIZATION: | PUCPR | ORGANIZATION: | |

| | | | |
|---------------|--|---------------|--|
| ACCEPTED BY | | ACCEPTED BY | |
| NAME: | | NAME: | |
| SIGNATURE: | | SIGNATURE: | |
| DATE: | | DATE: | |
| ORGANIZATION: | | ORGANIZATION: | |

LAB INFORMATION

| | | | | |
|---------------------|-------|---|-------------------------------|--------------------------------|
| SAMPLE SHIPPED VIA: | FEDEX | <input checked="" type="checkbox"/> ESI | <input type="checkbox"/> MAIL | <input type="checkbox"/> OTHER |
| SAMPLE RECEIVED BY: | | SIGNATURE: | | |
| DATE: | | TIME: | | |

BILLING INFORMATION

| | | | |
|-------------------|--|----------|------------------|
| ESI Quote #: | 04-080-BK | | |
| Billing Customer: | Clean Harbors Environmental Services, Inc. | PO#: | |
| Billing Contact: | Edgar Medina | Phone #: | 787-846-0300 x 3 |

Day & Date 4/13/04
 Manifest No. N/A ()
 Manifest No. ()
 Manifest No. ()
 Manifest No. ()
 Customer Pomperoy University Cordoba



Job No. C8752957
 P.O. No. 42544
 Billing Type QUOTE / CONTRACT / STD
 QUOTE # _____
 On-site Contact Hilda Santiago
 Billing Address _____
 Attn.: _____

Site Address _____

| LABOR | ID # | Per Diem | Straight Time | Over Time | Double Time | JOB DESCRIPTION |
|-------|------|----------|---------------|-----------|-------------|---|
| | | | | | | <u>PACKAGING of RADIOACTIVE MATERIAL for sampling AT Ecology SERVICES</u> |
| | | | | | | <u>GREG HOWETT</u> |

| MATERIALS USED | | | MATERIALS D/O | | |
|----------------|---------------|---------------|---------------|---------------|--|
| 55 Gal. Steel | 55 Gal. Fiber | Verm | 55 Gal. Steel | Verm | |
| 55 Gal. Poly | 30 Gal. Fiber | Cu Yd Box | 55 Gal. Poly | Cu Yd Box | |
| 16 Gal. Poly | 20 Gal. Fiber | Combo Box | 16 Gal. Poly | Combo Box | |
| 30 Gal. Poly | 10 Gal. Fiber | 85 Gal. Poly | 30 Gal. Poly | 85 Gal. Poly | |
| 30 Gal. Steel | 5 Gal. Fiber | 85 Gal. Steel | 30 Gal. Steel | 85 Gal. Steel | |
| 5 Gal. Poly | | | 5 Gal. Poly | | |

| QTY. | SIZE | DISPOSAL CODE / PROFILE # | WEIGHT | MANIFEST NO. |
|------|------|---------------------------|--------|--------------|
| | | <u>"No Disposal"</u> | | |
| | | <u>1 x 05 gallon pail</u> | | |

| TRANSPORTATION / EQUIP. | FLEET # | FLEET # | FLEET # |
|-------------------------|------------------------------|-----------------------------|---------|
| Box Truck/PU/Var/PV | | | |
| Personal Vehicle | | | |
| MOB/Demob | <input type="checkbox"/> Yes | <input type="checkbox"/> No | |
| Bobcat/Forklift: Rental | <input type="checkbox"/> Yes | <input type="checkbox"/> No | |

| NEW PROFILES | SAMPLE | NEW PROFILES | SAMPLE |
|--------------|-----------|--------------|-----------|
| | () () N | | () () N |
| | () () N | | () () N |
| | () () N | | () () N |
| | () () N | | () () N |

| WASTE LEFT ON SITE | | |
|--------------------|------|--------------------|
| QTY. | SIZE | TYPE / DESCRIPTION |
| | | |
| | | |

JOB COMPLETE YES NO
 IF NO, WHY? _____

 CHESI Representative completing job sheet.
 Date _____

CHANGE ORDER INITIATED YES NO CUST. INIT. _____
 BY: Hilda Santiago
 (Signature)
Hilda Santiago
 (Print)
Customer Representative
 (Title)
4/13/04
 (Date)

Caraballo Orengo Ada

From: Medina, Edgar A [medinaed@cleanharbors.com]
Sent: Monday, April 19, 2004 9:54 PM
To: Santiago Santiago Hilda
Cc: Caraballo Orengo Ada; Bordoni, Michel A
Subject: FW: Online FedEx Tracking - 839817405664

Hi Hilda

Hope everything is well at Ponce !
Please review " sample received" confirmation from Ecology Services. Regards Edgar Medina
(7870 475-9571

-----Original Message-----

From: bklug@ecologyservices.com [mailto:bklug@ecologyservices.com]
Sent: Friday, April 16, 2004 1:59 PM
Subject: Online FedEx Tracking - 839817405664

confirmation of receipt of Pontificia Universidad Catolica

Tracking Number : 839817405664
Reference Number :
Ship Date : 04/13/2004
Delivered To : Receipt/Frnt desk
Delivery Location : COLUMBIA MA
Delivery Date/Time : 04/14/2004 09:44
Signed For By : E.EUIEGITS
Service Type : International Priority Service

| Scan Activity | Date/Time | Scan Exceptions |
|---|------------------|-----------------|
| Delivered COLUMBIA MA | 04/14/2004 09:44 | |
| On FedEx vehicle for delivery BELTSVILLE MD | 04/14/2004 08:13 | |
| Arrived at FedEx Destination Location BELTSVILLE MD | 04/14/2004 08:13 | |
| Arrived at FedEx Ramp BALTIMORE MD | 04/14/2004 07:03 | |
| Left FedEx Sort Facility MEMPHIS TN | 04/14/2004 04:07 | |
| Arrived at Sort Facility MEMPHIS TN | 04/14/2004 00:44 | |
| Left FedEx Ramp CAROLINA PR | 04/13/2004 22:49 | |
| Left FedEx Origin Location GUAYNABO PR | 04/13/2004 20:37 | |
| Picked up by FedEx GUAYNABO PR | 04/13/2004 16:57 | |

Disclaimer

FedEx has not validated the authenticity of any email address.



CHAIN OF CUSTODY

10220 Old Columbia Road
Columbia, Maryland 21046
410-381-2600
800-932-7299
Fax 410-381-2602

SAMPLE GENERATOR INFORMATION

| | | | |
|---------------------|--------------------------------|-----------------|--|
| NAME: | Pontifica Universidad Católica | | |
| LOCATION (CITY/ST): | | | |
| SAMPLE TYPE: | | | |
| AMOUNT COLLECTED: | | TIME COLLECTED: | |
| COLLECTOR'S NAME: | | DATE COLLECTED: | |

FIELD INFORMATION – SPECIAL INSTRUCTIONS

| |
|------------------------------------|
| Packaged and shipped by ESI |
| |
| |
| |
| |

CHAIN OF POSSESSION

| ORIGIN | ACCEPTED BY |
|---------------|---------------|
| NAME: | NAME: |
| SIGNATURE: | SIGNATURE: |
| DATE: | DATE: |
| ORGANIZATION: | ORGANIZATION: |

| ACCEPTED BY | ACCEPTED BY |
|---------------|---------------|
| NAME: | NAME: |
| SIGNATURE: | SIGNATURE: |
| DATE: | DATE: |
| ORGANIZATION: | ORGANIZATION: |

LAB INFORMATION

| | | | | |
|---------------------|--------------------------------|------------------------------|-------------------------------|--------------------------------|
| SAMPLE SHIPPED VIA: | <input type="checkbox"/> FEDEX | <input type="checkbox"/> ESI | <input type="checkbox"/> MAIL | <input type="checkbox"/> OTHER |
| SAMPLE RECEIVED BY: | Steven Keller | | SIGNATURE: | <i>St A. Keller</i> |
| DATE: | | TIME: | | |

BILLING INFORMATION

| | | | |
|-------------------|--|----------|------------------|
| ESI Quote #: | 04-080-BK | | |
| Billing Customer: | Clean Harbors Environmental Services, Inc. | PO#: | |
| Billing Contact: | Edgar Medina | Phone #: | 787-846-0300 x 3 |



ECOLOGY SERVICES, INC.

10220 Old Columbia Road
Columbia, Maryland 21046
(410) 381-2600
1-800-932-7299
Fax (410) 381-2602

June 16, 2004

Mr. Edgar Medina
Clean Harbors Environmental Services, Inc.
Rural Road 666, Km. 0.05
Bo. Magueyes
Barceloneta, P.R. 00617

RE: Sample Analysis Results for: Pontifica Universidad Catolica(04-080-BK)

Dear Mr. Medina:

I have enclosed the results of samples analyzed for your client. Please forward a copy of the attached results to them for their records. Any waste incident to the analysis of samples will be properly disposed as Ecology Services, Inc. laboratory waste in accordance with all applicable State and Federal regulations.

If you have any questions or concerns, please contact your account manager.

Thank you for your continued use of Ecology Services, Inc. for your health physics service needs.

Sincerely,

Elise Ruzewski
Administrative Assistant

RECEIVED
Ofic. Superior, G. J. and
y Salud Ocupacional

AUG 24 2004

PONTIFICIA UNIVERSIDAD
CATOLICA

LS Counter Data Reduction Program - ESI

Instrument Data: Beckman LS-2800

Report Date: 29-Apr-04

Window: 0 ULL: 400 (Tritium)

Sample Date: 14-Apr-04

Background Data:

Analysis By: SAK

| Bkg CPM | Count Time (min) | % Error (95% C.L.) |
|---------|------------------|--------------------|
| 10.00 | 1.00 | 61.98% |

MDA Data:

MDA (CPM) 18

MDA (DPM): 25

Sample Data:

Note: A zero reading for DPM values indicates only that the sample activity was less than the MDA.

| Seq No. | Sample ID | Count Time (min) | Average H Number | CPM | Efficiency | DPM | Error (95% C.L.) |
|---------|-----------|------------------|------------------|-------|------------|-----|------------------|
| 1 | Wipe #1 | 1.00 | 128.0 | 17.00 | 31.3% | 0 | 0.00% |
| 2 | 2 | 1.00 | 127.0 | 16.00 | 31.6% | 0 | 0.00% |
| 3 | 3 | 1.00 | 125.0 | 12.00 | 32.1% | 0 | 0.00% |
| 4 | 4 | 1.00 | 125.0 | 16.00 | 32.1% | 0 | 0.00% |
| 5 | 5 | 1.00 | 123.0 | 11.00 | 32.6% | 0 | 0.00% |
| 6 | 6 | 1.00 | 126.0 | 14.00 | 31.8% | 0 | 0.00% |
| 7 | 7 | 1.00 | 119.0 | 8.00 | 33.5% | 0 | 0.00% |
| 8 | 8 | 1.00 | 122.0 | 10.00 | 32.8% | 0 | 0.00% |
| 9 | 9 | 1.00 | 122.0 | 11.00 | 32.8% | 0 | 0.00% |
| 10 | 10 | 1.00 | 129.0 | 8.00 | 31.1% | 0 | 0.00% |
| 11 | 11 | 1.00 | 119.0 | 14.00 | 33.5% | 0 | 0.00% |
| 12 | 12 | 1.00 | 122.0 | 8.00 | 32.8% | 0 | 0.00% |
| 13 | 13 | 1.00 | 127.0 | 14.00 | 31.6% | 0 | 0.00% |
| 14 | 14 | 1.00 | 130.0 | 14.00 | 30.8% | 0 | 0.00% |
| 15 | 15 | 1.00 | 124.0 | 15.00 | 32.3% | 0 | 0.00% |
| 16 | 16 | 1.00 | 126.0 | 13.00 | 31.8% | 0 | 0.00% |
| 17 | 17 | 1.00 | 123.0 | 15.00 | 32.6% | 0 | 0.00% |
| 18 | 18 | 1.00 | 122.0 | 11.00 | 32.8% | 0 | 0.00% |
| 19 | 19 | 1.00 | 124.0 | 12.00 | 32.3% | 0 | 0.00% |
| 20 | 20 | 1.00 | 124.0 | 12.00 | 32.3% | 0 | 0.00% |
| 21 | 21 | 1.00 | 128.0 | 12.00 | 31.3% | 0 | 0.00% |
| 22 | 22 | 1.00 | 132.0 | 13.00 | 30.3% | 0 | 0.00% |
| 23 | 23 | 1.00 | 128.0 | 4.00 | 31.3% | 0 | 0.00% |
| 24 | 24 | 1.00 | 119.0 | 9.00 | 33.5% | 0 | 0.00% |
| 25 | 25 | 1.00 | 124.0 | 11.00 | 32.3% | 0 | 0.00% |
| 26 | 26 | 1.00 | 120.0 | 6.00 | 33.3% | 0 | 0.00% |
| 27 | 27 | 1.00 | 126.0 | 3.00 | 31.8% | 0 | 0.00% |
| 28 | 28 | 1.00 | 124.0 | 16.00 | 32.3% | 0 | 0.00% |
| 29 | 29 | 1.00 | 125.0 | 8.00 | 32.1% | 0 | 0.00% |
| 30 | Wipe #30 | 1.00 | 127.0 | 11.00 | 31.6% | 0 | 0.00% |

| |
|--|
| LS Counter Data Reduction Program - ESI |
|--|

Instrument Data: Beckman LS-2800

Report Date: 29-Apr-04

Window: 401 UL: 670 (Carbon-14)

Sample Date: 14-Apr-04

Background Data:

Analysis By: SAK

| Bkg CPM | Count Time (min) | % Error (95% C.L.) |
|------------|---------------------|-----------------------|
| 11.00 | 1.00 | 59.10% |

MDA Data:

MDA (CPM): 18 MDA (DPM): 28

Sample Data: Note: A zero reading for DPM values indicates only that the sample activity was less than the MDA.

| Seq No. | Sample ID | Count Time (min) | Average H Number | CPM | Efficiency | DPM | Error (95% C.L.) |
|------------|-----------|---------------------|---------------------|----------|------------|-------|---------------------|
| 1 | Wipe #1 | 1.00 | 128.0 | 23.00 | 71.8% | 0 | 0.00% |
| 2 | 2 | 1.00 | 127.0 | 38968.00 | 71.9% | 54179 | 11.22% |
| 3 | 3 | 1.00 | 125.0 | 56.00 | 72.0% | 62 | 30.75% |
| 4 | 4 | 1.00 | 125.0 | 17.00 | 72.0% | 0 | 0.00% |
| 5 | 5 | 1.00 | 123.0 | 33.00 | 72.2% | 30 | 40.95% |
| 6 | 6 | 1.00 | 126.0 | 37988.00 | 72.0% | 52764 | 11.23% |
| 7 | 7 | 1.00 | 119.0 | 9.00 | 72.5% | 0 | 0.00% |
| 8 | 8 | 1.00 | 122.0 | 12.00 | 72.3% | 0 | 0.00% |
| 9 | 9 | 1.00 | 122.0 | 34333.00 | 72.3% | 47502 | 11.23% |
| 10 | 10 | 1.00 | 129.0 | 55.00 | 71.8% | 61 | 31.04% |
| 11 | 11 | 1.00 | 119.0 | 78.00 | 72.5% | 92 | 26.21% |
| 12 | 12 | 1.00 | 122.0 | 23465.00 | 72.3% | 32461 | 11.25% |
| 13 | 13 | 1.00 | 127.0 | 48.00 | 71.9% | 51 | 33.30% |
| 14 | 14 | 1.00 | 130.0 | 35454.00 | 71.7% | 49439 | 11.23% |
| 15 | 15 | 1.00 | 124.0 | 14.00 | 72.1% | 0 | 0.00% |
| 16 | 16 | 1.00 | 126.0 | 23433.00 | 72.0% | 32542 | 11.25% |
| 17 | 17 | 1.00 | 123.0 | 11.00 | 72.2% | 0 | 0.00% |
| 18 | 18 | 1.00 | 122.0 | 41.00 | 72.3% | 42 | 36.24% |
| 19 | 19 | 1.00 | 124.0 | 13.00 | 72.1% | 0 | 0.00% |
| 20 | 20 | 1.00 | 124.0 | 12320.00 | 72.1% | 17069 | 11.32% |
| 21 | 21 | 1.00 | 128.0 | 8.00 | 71.8% | 0 | 0.00% |
| 22 | 22 | 1.00 | 132.0 | 13.00 | 71.5% | 0 | 0.00% |
| 23 | 23 | 1.00 | 128.0 | 37611.00 | 71.8% | 52343 | 11.23% |
| 24 | 24 | 1.00 | 119.0 | 54.00 | 72.5% | 59 | 31.33% |
| 25 | 25 | 1.00 | 124.0 | 7.00 | 72.1% | 0 | 0.00% |
| 26 | 26 | 1.00 | 120.0 | 34322.00 | 72.4% | 47397 | 11.23% |
| 27 | 27 | 1.00 | 126.0 | 29.00 | 72.0% | 0 | 0.00% |
| 28 | 28 | 1.00 | 124.0 | 15.00 | 72.1% | 0 | 0.00% |
| 29 | 29 | 1.00 | 125.0 | 77.00 | 72.0% | 92 | 26.37% |
| 30 | Wipe #30 | 1.00 | 127.0 | 8.00 | 71.9% | 0 | 0.00% |

| |
|--|
| LS Counter Data Reduction Program - ESI |
|--|

Instrument Data: Beckman LS-2800

Report Date: 29-Apr-04

Sample Date: 14-Apr-04

Window: 671 UL: 1000 (Phosphorus-32)

Analysis By: SAK

Background Data:

| | | |
|------------|---------------------|-----------------------|
| Bkg CPM | Count Time (min) | % Error (95% C.L.) |
| 10.00 | 1.00 | 61.98% |

MDA Data:

MDA (CPM): 18 MDA (DPM): 22

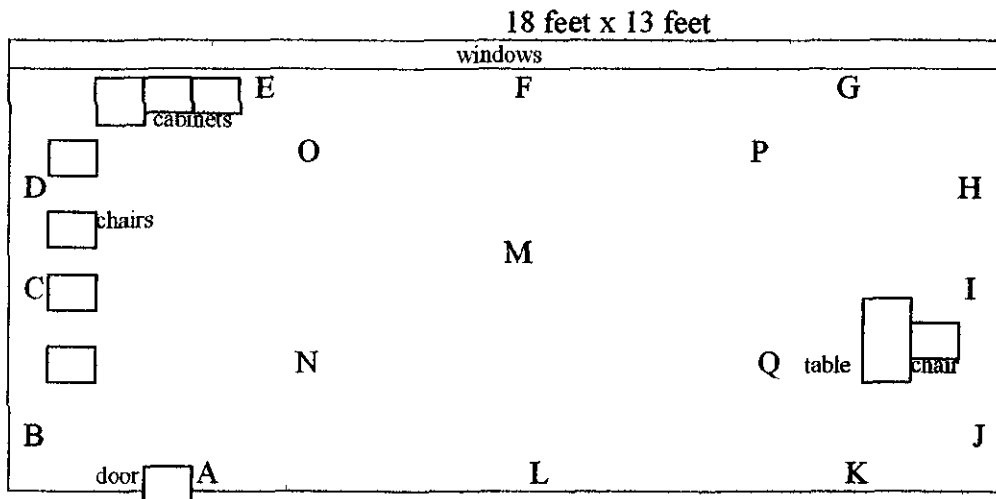
Sample Data: Note: A zero reading for DPM values indicates only that the sample activity was less than the MDA.

| Seq No. | Sample ID | Count Time (min) | Average H Number | CPM | Efficiency | DPM | Error (95% C.L.) |
|------------|-----------|---------------------|---------------------|-------|------------|-----|---------------------|
| 1 | Wipe #1 | 1.00 | 128.0 | 11.00 | 81.7% | 0 | 0.00% |
| 2 | 2 | 1.00 | 127.0 | 17.00 | 81.7% | 0 | 0.00% |
| 3 | 3 | 1.00 | 125.0 | 16.00 | 81.6% | 0 | 0.00% |
| 4 | 4 | 1.00 | 125.0 | 10.00 | 81.6% | 0 | 0.00% |
| 5 | 5 | 1.00 | 123.0 | 10.00 | 81.6% | 0 | 0.00% |
| 6 | 6 | 1.00 | 126.0 | 12.00 | 81.7% | 0 | 0.00% |
| 7 | 7 | 1.00 | 119.0 | 20.00 | 81.6% | 0 | 0.00% |
| 8 | 8 | 1.00 | 122.0 | 9.00 | 81.6% | 0 | 0.00% |
| 9 | 9 | 1.00 | 122.0 | 13.00 | 81.6% | 0 | 0.00% |
| 10 | 10 | 1.00 | 129.0 | 9.00 | 81.7% | 0 | 0.00% |
| 11 | 11 | 1.00 | 119.0 | 14.00 | 81.6% | 0 | 0.00% |
| 12 | 12 | 1.00 | 122.0 | 15.00 | 81.6% | 0 | 0.00% |
| 13 | 13 | 1.00 | 127.0 | 14.00 | 81.7% | 0 | 0.00% |
| 14 | 14 | 1.00 | 130.0 | 13.00 | 81.7% | 0 | 0.00% |
| 15 | 15 | 1.00 | 124.0 | 8.00 | 81.6% | 0 | 0.00% |
| 16 | 16 | 1.00 | 126.0 | 7.00 | 81.7% | 0 | 0.00% |
| 17 | 17 | 1.00 | 123.0 | 10.00 | 81.6% | 0 | 0.00% |
| 18 | 18 | 1.00 | 122.0 | 11.00 | 81.6% | 0 | 0.00% |
| 19 | 19 | 1.00 | 124.0 | 13.00 | 81.6% | 0 | 0.00% |
| 20 | 20 | 1.00 | 124.0 | 9.00 | 81.6% | 0 | 0.00% |
| 21 | 21 | 1.00 | 128.0 | 9.00 | 81.7% | 0 | 0.00% |
| 22 | 22 | 1.00 | 132.0 | 10.00 | 81.7% | 0 | 0.00% |
| 23 | 23 | 1.00 | 128.0 | 6.00 | 81.7% | 0 | 0.00% |
| 24 | 24 | 1.00 | 119.0 | 10.00 | 81.6% | 0 | 0.00% |
| 25 | 25 | 1.00 | 124.0 | 12.00 | 81.6% | 0 | 0.00% |
| 26 | 26 | 1.00 | 120.0 | 15.00 | 81.6% | 0 | 0.00% |
| 27 | 27 | 1.00 | 126.0 | 10.00 | 81.7% | 0 | 0.00% |
| 28 | 28 | 1.00 | 124.0 | 16.00 | 81.6% | 0 | 0.00% |
| 29 | 29 | 1.00 | 125.0 | 11.00 | 81.6% | 0 | 0.00% |
| 30 | Wipe #30 | 1.00 | 127.0 | 13.00 | 81.7% | 0 | 0.00% |

Pontifical Catholic University
March 26, 2007

Laboratory room Fe-119
Survey readings:

| Location | mr/hr |
|--------------------|-------|
| Door A: | 0 |
| Concrete wall B: | 0 |
| Concrete wall C: | 0 |
| Concrete wall D: | 0 |
| Window and wall E: | 0 |
| Window and wall F: | 0 |
| Window and wall G: | 0 |
| Concrete wall H: | 0 |
| Concrete wall I: | 0 |
| Concrete wall J: | 0 |
| Concrete wall K: | 0 |
| Concrete wall L: | 0 |
| Center of room M: | 0 |
| Floor N: | 0 |
| Floor O: | 0 |
| Floor P: | 0 |
| Floor Q: | 0 |

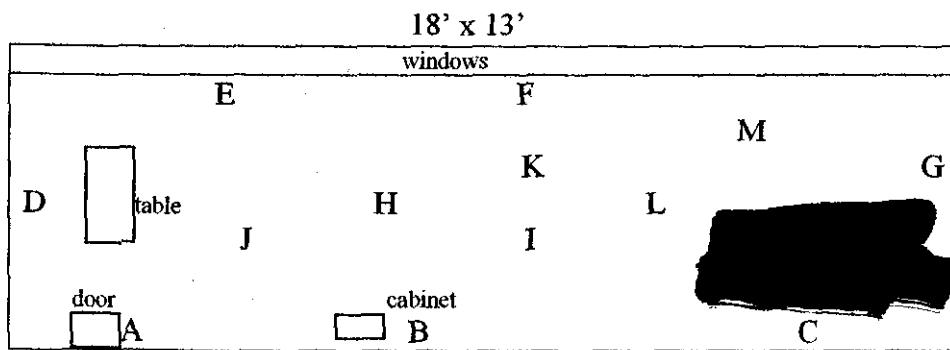


Instrument used: Ludlum Model 2
Probe: Pancake model 44-9
Calibrated: Jan 29/07

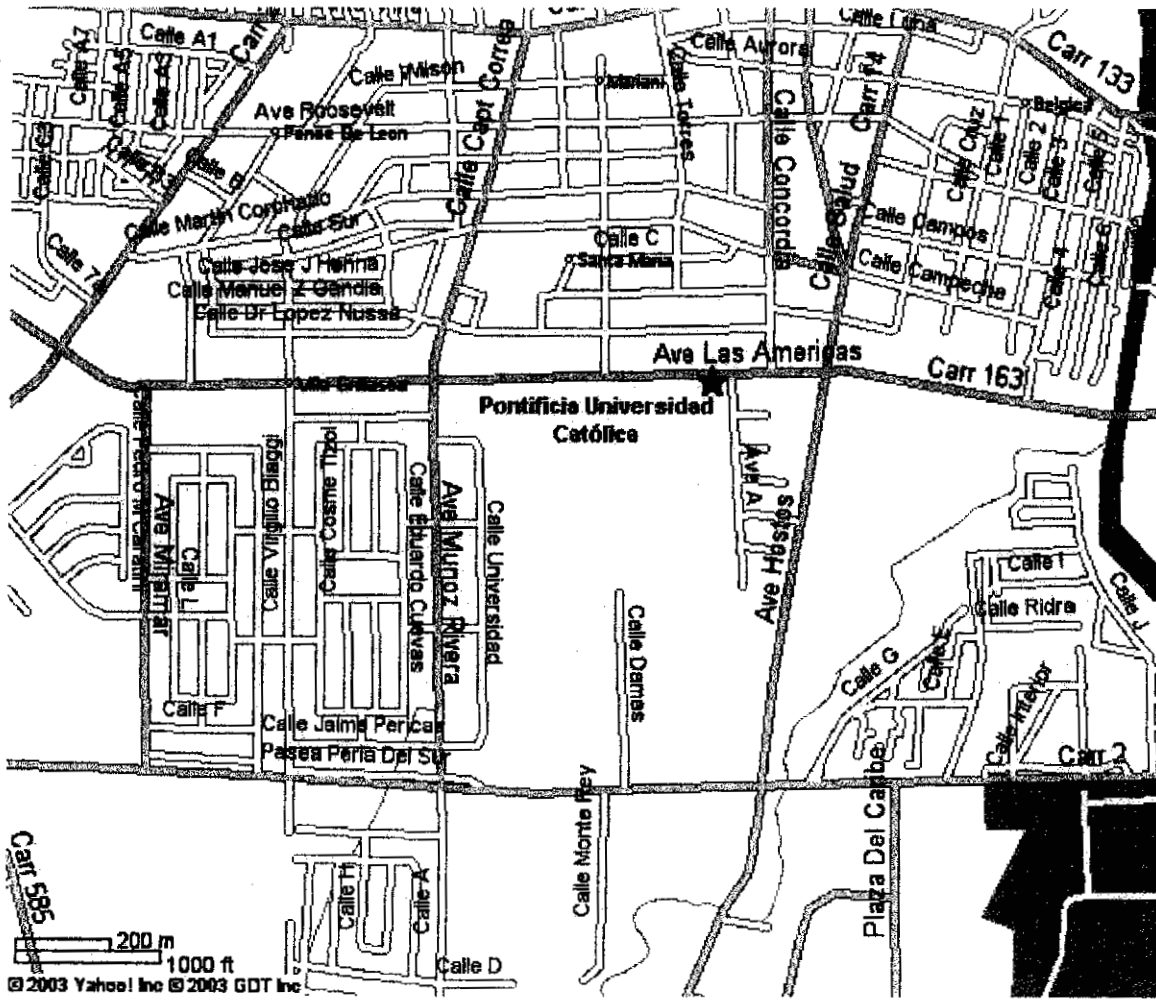
Pontifical Catholic University
March 26, 2007

Laboratory room Fe-120
Survey readings:

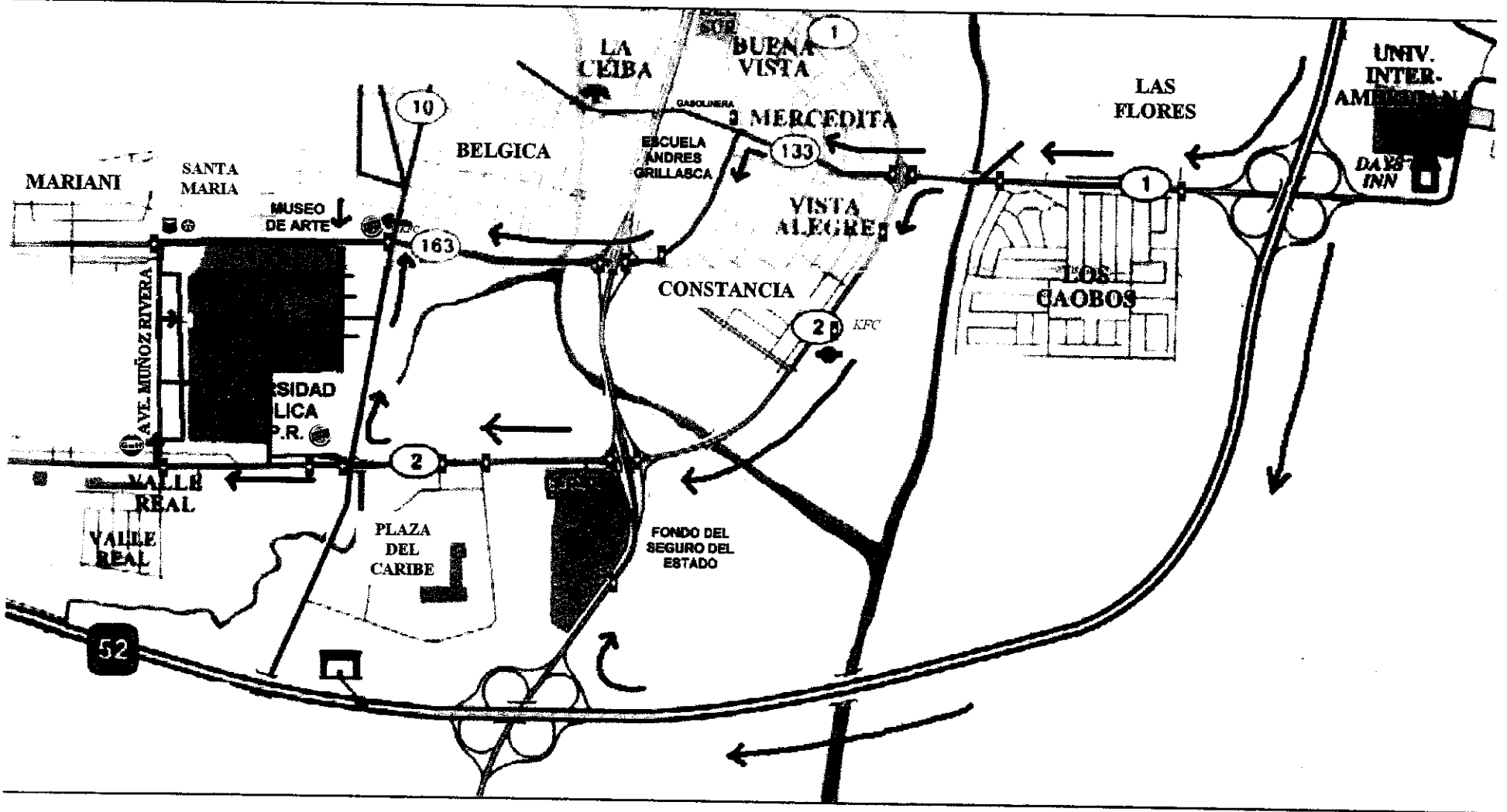
| Location | mr/hr |
|--------------------|-------|
| Door A: | 0 |
| Concret wall B: | 0 |
| Concrete wall C: | 0.01 |
| Concrete wall D: | 0 |
| Wall and window E: | 0 |
| Wall and window F: | 0 |
| Wall G: | 0 |
| Room center H: | 0 |
| Room floor I*: | 0.01 |
| Room floor J: | 0 |
| Room floor K: | 0 |
| Room floor L: | 0 |
| Room floor M: | 0 |



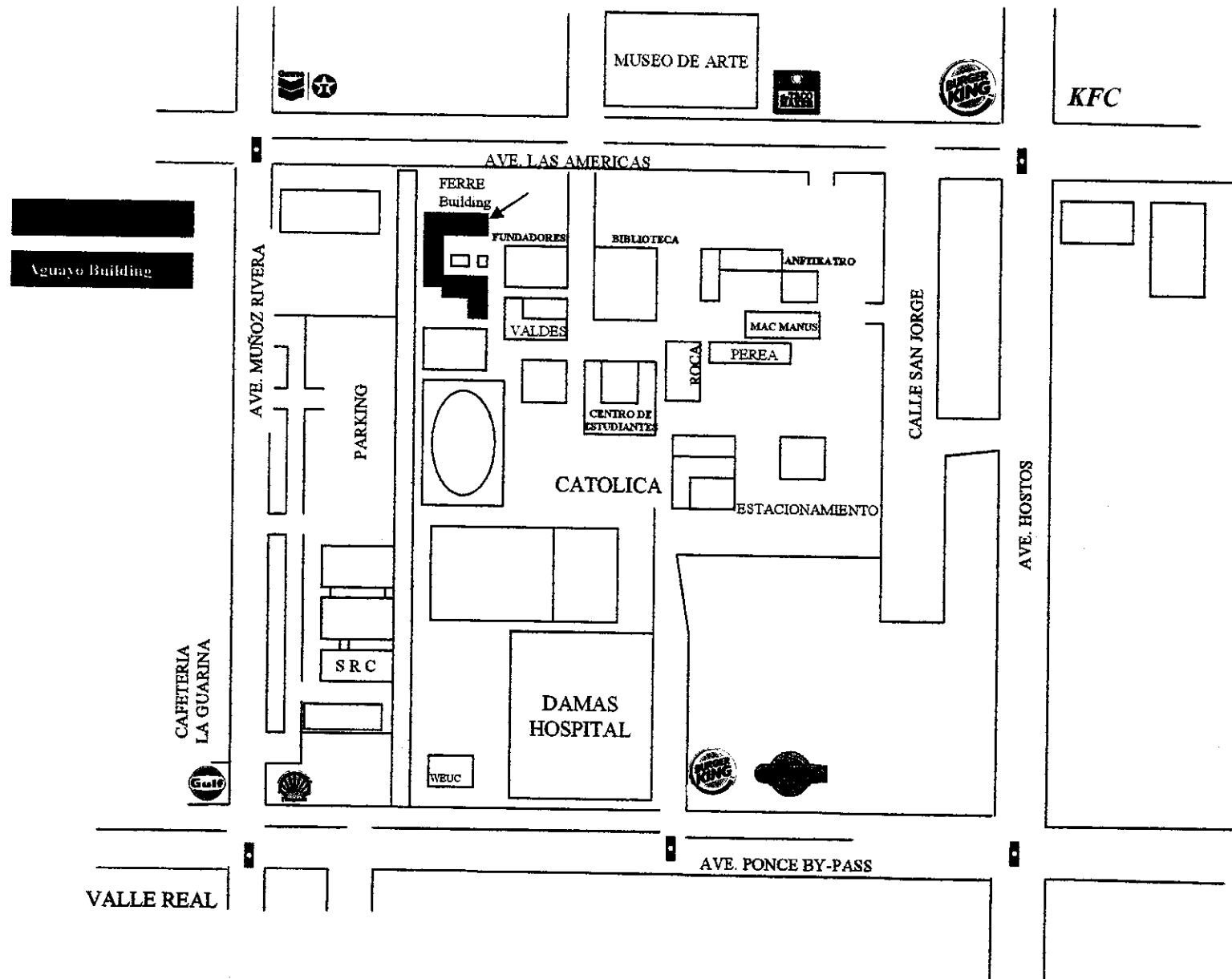
Instrument used: Ludlum Model 2
Probe: Pancake model 44-9
Calib.: Jan 29/07



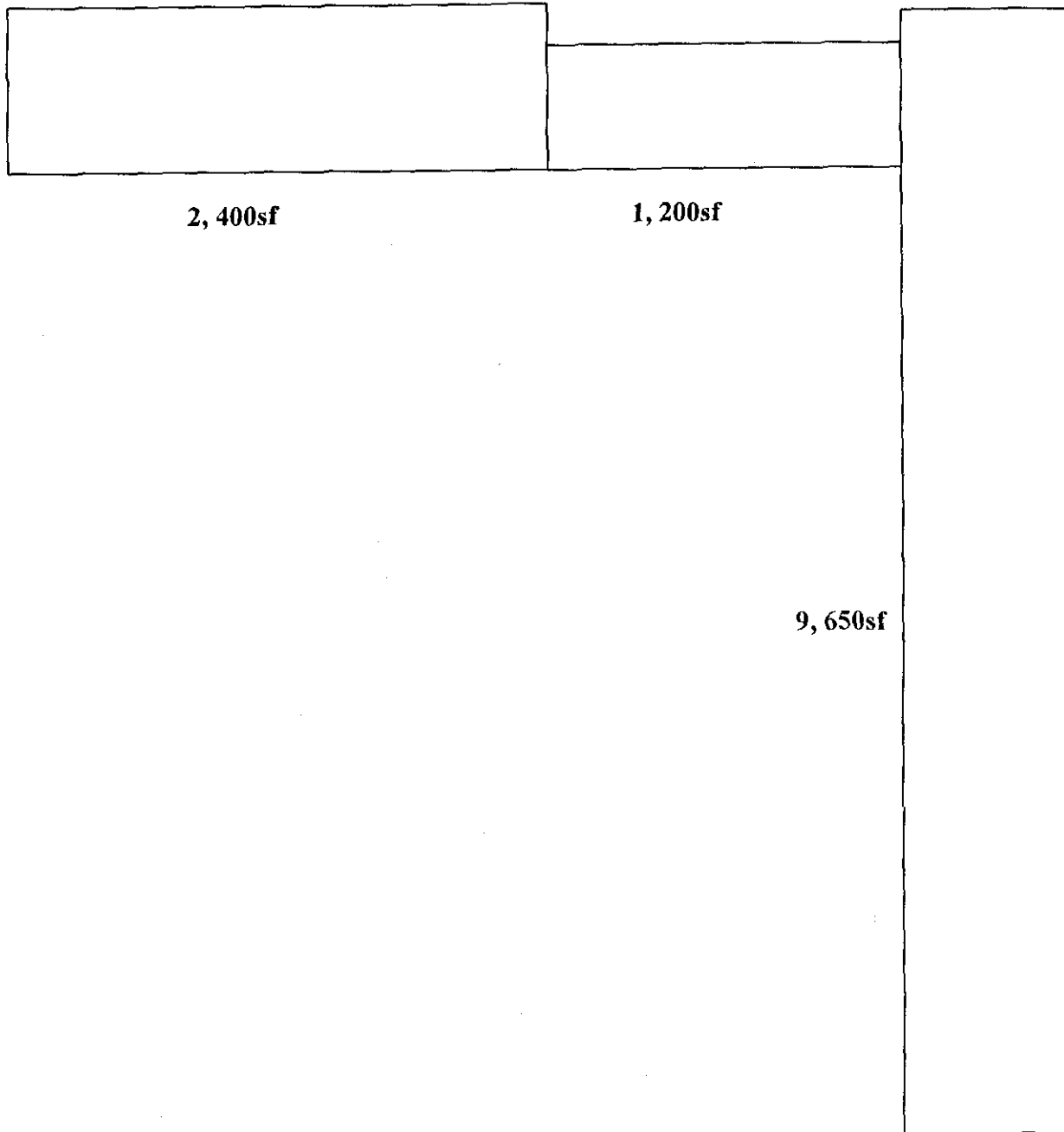
HOW TO GET TO PONTIFICAL CATHOLIC UNIVERSITY OF PR



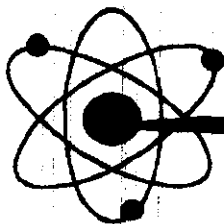
PONTIFICAL CATHOLIC UNIVERSITY OF PUERTO RICO



**PONTIFICAL CATHOLIC UNIVERSITY OF PUERTO RICO
FERRÉ BUILDING**



Total: 13,274 square feet



Wisconsin Radiological Laboratories, Inc.

521 N. Business Park Circle · Stoughton, WI 53589

Phone: 608 - 877 - 0636 Fax: 608 - 877 - 0656


June 5, 2007

Prof. Carmen I. Asencio
Pontifical Catholic University of Puerto Rico
2250 Las Americas, Suite 654
Ponce, Puerto Rico 00717-9997

This letter is to report the wipe test results taken from rooms 119 and 120 taken in May of 2007. The sample analysis was performed on May 8, 2007 in a high efficiency liquid scintillation counter. Results were evaluated by comparison with standard sources whose activity is directly traceable to NIST standards. The samples indicated removable activity of less than 0.005 microCurie. All tests were performed under State of Wisconsin Agreement License # 025-1356-01 issued to Wisconsin Radiological Laboratories (WRL). Tabular summaries of the test results are attached for your permanent records.

If you have any questions or require further assistance, please do not hesitate to call upon me at (608) 877-0636.

Sincerely,


Lawrence J. McDonnell, Director,
Laboratory Operations

Catholic University of Puerto Rico

Prof. Carmen I. Asencio

Leak Test Results May, 2007

Order No. C0 5396

| TEST NO. | LOCATION Room | ISOTOPE | DATE WIPED | ACTIVITY DPM | ACTIVITY uCi | REG LIMIT uCi | MDA uCi |
|-----------------|--------------------------|----------------|-------------------|-------------------------|-------------------------|--------------------------|--------------------|
| 5698 | 119 Floor Entrance | C-14 | May 2007 | 0 | 0.0 | 0.005 | 0.00004 |
| 5699 | 119 Floor Center | C-14 | May 2007 | 0 | 0.0 | 0.005 | 0.00004 |
| 5700 | 119 Floor Rear | C-14 | May 2007 | 0 | 0.0 | 0.005 | 0.00004 |
| 5713 | 119 Floor Rear | C-14 | May 2007 | 0 | 0.0 | 0.005 | 0.00004 |
| 5714 | 119 Left Wall | C-14 | May 2007 | 0 | 0.0 | 0.005 | 0.00004 |
| 5715 | 119 Rear Wall | C-14 | May 2007 | 0 | 0.0 | 0.005 | 0.00004 |
| 5716 | 119 Right Wall | C-14 | May 2007 | 4 | 2×10^{-6} | 0.005 | 0.00004 |
| 5717 | 119 Entrance Wall | C-14 | May 2007 | 9 | 4×10^{-6} | 0.005 | 0.00004 |
| 5718 | 119 New Rear Cab. | C-14 | May 2007 | 0 | 0.0 | 0.005 | 0.00004 |
| 5719 | 119 Entrance Table | C-14 | May 2007 | 0 | 0.0 | 0.005 | 0.00004 |
| 5720 | 119 Entrance Door | C-14 | May 2007 | 12 | 6×10^{-6} | 0.005 | 0.00004 |
| 5721 | 119 Left Wall Tube | C-14 | May 2007 | 1 | 5×10^{-7} | 0.005 | 0.00004 |
| 5701 | 120 Floor Door Ent. | C-14 | May 2007 | 0 | 0.0 | 0.005 | 0.00004 |
| 5702 | 120 Floor Center | C-14 | May 2007 | 0 | 0.0 | 0.005 | 0.00004 |
| 5703 | 120 Floor Right | C-14 | May 2007 | 2 | 1×10^{-6} | 0.005 | 0.00004 |
| 5704 | 120 Floor Left | C-14 | May 2007 | 12 | 6×10^{-6} | 0.005 | 0.00004 |
| 5705 | 120 Floor Rear | C-14 | May 2007 | 0 | 0.0 | 0.005 | 0.00004 |
| 5706 | 120 Sink | C-14 | May 2007 | 0 | 0.0 | 0.005 | 0.00004 |
| 5707 | 120 Left Wall | C-14 | May 2007 | 7 | 3×10^{-6} | 0.005 | 0.00004 |
| 5708 | 120 Right Wall | C-14 | May 2007 | 8 | 4×10^{-6} | 0.005 | 0.00004 |
| 5709 | 120 Rear Wall | C-14 | May 2007 | 0 | 0.0 | 0.005 | 0.00004 |

| TEST NO. | LOCATION Room | ISOTOPE | DATE WIPED | ACTIVITY DPM | ACTIVITY uCi | REG LIMIT uCi | MDA uCi |
|-----------------|--------------------------|----------------|-------------------|-------------------------|-------------------------|--------------------------|--------------------|
| 5710 | 120 Rear Window | C-14 | May 2007 | 0 | 0.0 | 0.005 | 0.00004 |
| 5711 | 120 Working Table | C-14 | May 2007 | 0 | 0.0 | 0.005 | 0.00004 |
| 5712 | 120 Entrance Door | C-14 | May 2007 | 0 | 0.0 | 0.005 | 0.00004 |

Results are reported as Activity in disintegrations per minute (DPM) (net counts per minute times efficiency), and in units of microcuries (uCi). the MDA is the minimum detectable amount of radioactivity that can be detected by the counting instrument and is reported in units of microcuries (uCi). All results were well below the regulatory limit of 0.005 uCi for removable contamination.

Wisconsin Radiological Labs. Inc. State of Wisconsin Agreement State License # 025-1356-01

Catholic University of Puerto Rico

Prof. Carmen I. Asencio

Leak Test Results May, 2007

Order No. C0 5396

| TEST NO. | LOCATION Room | ISOTOPE | DATE WIPED | ACTIVITY DPM | ACTIVITY uCi | REG LIMIT uCi | MDA uCi |
|-----------------|--------------------------|----------------|-------------------|-------------------------|-------------------------|--------------------------|--------------------|
| 5698 | 119 Floor Entrance | H-3 | May 2007 | 44 | 2x10 ⁻⁵ | 0.005 | 0.00004 |
| 5699 | 119 Floor Center | H-3 | May 2007 | 14 | 7x10 ⁻⁶ | 0.005 | 0.00004 |
| 5700 | 119 Floor Rear | H-3 | May 2007 | 18 | 9x10 ⁻⁶ | 0.005 | 0.00004 |
| 5713 | 119 Floor Rear | H-3 | May 2007 | 0 | 0.0 | 0.005 | 0.00004 |
| 5714 | 119 Left Wall | H-3 | May 2007 | 21 | 1x10 ⁻⁶ | 0.005 | 0.00004 |
| 5715 | 119 Rear Wall | H-3 | May 2007 | 0 | 0.0 | 0.005 | 0.00004 |
| 5716 | 119 Right Wall | H-3 | May 2007 | 30 | 1x10 ⁻⁵ | 0.005 | 0.00004 |
| 5717 | 119 Entrance Wall | H-3 | May 2007 | 51 | 3x10 ⁻⁵ | 0.005 | 0.00004 |
| 5718 | 119 New Rear Cab. | H-3 | May 2007 | 9 | 0.0 | 0.005 | 0.00004 |
| 5719 | 119 Entrance Table | H-3 | May 2007 | 25 | 2x10 ⁻⁵ | 0.005 | 0.00004 |
| 5720 | 119 Entrance Door | H-3 | May 2007 | 0 | 0.0 | 0.005 | 0.00004 |
| 5721 | 119 Left Wall Tube | H-3 | May 2007 | 7 | 3x10 ⁻⁶ | 0.005 | 0.00004 |
| 5701 | 120 Floor Door Ent. | H-3 | May 2007 | 0 | 0.0 | 0.005 | 0.00004 |
| 5702 | 120 Floor Center | H-3 | May 2007 | 0 | 0.0 | 0.005 | 0.00004 |
| 5703 | 120 Floor Right | H-3 | May 2007 | 7 | 3x10 ⁻⁶ | 0.005 | 0.00004 |
| 5704 | 120 Floor Left | H-3 | May 2007 | 39 | 2x10 ⁻⁵ | 0.005 | 0.00004 |
| 5705 | 120 Floor Rear | H-3 | May 2007 | 11 | 0.0 | 0.005 | 0.00004 |
| 5706 | 120 Sink | H-3 | May 2007 | 9 | 0.0 | 0.005 | 0.00004 |
| 5707 | 120 Left Wall | H-3 | May 2007 | 18 | 9x10 ⁻⁶ | 0.005 | 0.00004 |
| 5708 | 120 Right Wall | H-3 | May 2007 | 3 | 1x10 ⁻⁶ | 0.005 | 0.00004 |
| 5709 | 120 Rear Wall | H-3 | May 2007 | 9 | 4x10 ⁻⁶ | 0.005 | 0.00004 |

| TEST NO. | LOCATION Room | ISOTOPE | DATE WIPED | ACTIVITY DPM | ACTIVITY uCi | REG LIMIT uCi | MDA uCi |
|-----------------|--------------------------|----------------|-------------------|-------------------------|-------------------------|--------------------------|--------------------|
| 5710 | 120 Rear Window | H-3 | May 2007 | 0 | 0.0 | 0.005 | 0.00004 |
| 5711 | 120 Working Table | H-3 | May 2007 | 25 | 1×10^{-5} | 0.005 | 0.00004 |
| 5712 | 120 Entrance Door | H-3 | May 2007 | 0 | 0.0 | 0.005 | 0.00004 |

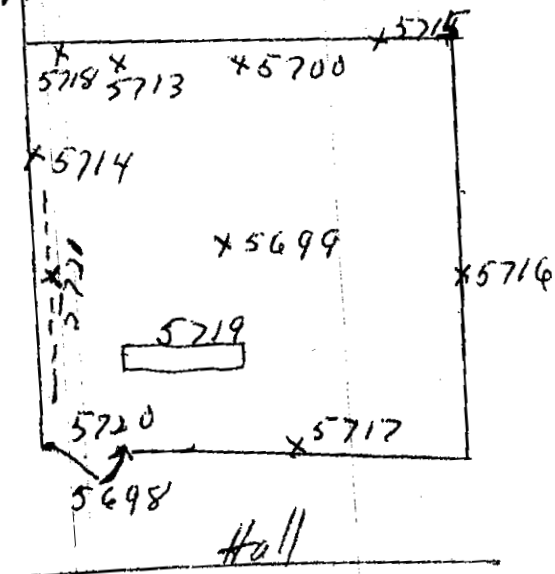
: Results are reported as Activity in disintegrations per minute (DPM) (net counts per minute times efficiency) , and in units of microcuries (uCi). the MDA is the minimum detectable amount of radioactivity that can be detected by the counting instrument and is reported in units of microcuries (uCi). All results were well below the regulatory limit of 0.005 uCi for removable contamination.

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Pontifical Catholic Uni. of Puerto Rico

Room 129 - Smears for C14, H3 Evaluation

| Sample # | Location T.D. |
|----------|------------------------|
| 5698 | Floor Entrance |
| 5699 | Floor Room Center |
| 5700 | Floor Room Rear |
| 5713 | Floor Room Rear |
| 5714 | Room Left wall |
| 5715 | Room Rear wall |
| 5716 | Room Right wall |
| 5717 | Room Entrance wall |
| 5718 | New Rear Cabinet |
| 5719 | Entrance Table |
| 5720 | Door Entrance |
| 5721 | Left wall tube (Elect) |



Pontificia/Catholic Uni. of Puerto Rico

Room 120 - Smears for C-14, H₃ evaluation

| Sample Num: | Location I.D. |
|-------------|---------------------|
| 5701 | Floor door entrance |
| 5702 | Floor Center |
| 5703 | Floor Right |
| 5704 | Floor Left |
| 5705 | Floor Rear |
| 5706 | Sink |
| 5707 | Left wall |
| 5708 | Right wall |
| 5709 | Rear wall |
| 5710 | Rear windows |
| 5711 | working Table top |
| 5712 | door entrance |

