



February 25, 1997

DL-022597-11

Mr. Salfar Lodhi
Nuclear Regulatory Commission Region I
475 Alleghenue Road
King of Prussia, PA 19406

29-20536-01
030-14389

FAX (610) 337-5269

Dear Mr. Lodhi:

The following is a copy of all the information I sent to Peter Pastorella, NDL, concerning the disposal of the radioactive waste located at Princeton (Psychiatric) Diagnostic Laboratories of America (PDLA) located in South Plainfield, NJ. As you will note in the correspondence from Teledyne dated February 13, 1997, they list seven drums containing iodine 125 waste material, one drum containing cobalt 57 and one containing liquid scintillation vials as opposed to two drums total we thought were on site per our correspondence December 19, 1996. I apologize for the discrepancy and also the delay in completing this project. Part of the delay has resulted from our inability until now to obtain a detailed and accurate report in writing from Teledyne.

Also as I stated to Mr. Pastorella, I do have the packing slips for the RIA kits received at PDLA from 12/93 to 12/94 with the isotope activity of the test kits. I do not have documentation concerning dosimetry data on the personnel, the maintenance records of wipe test or other contamination checks.

A representative from MEDTOX, Kevin Wiersma, Operations Manager, will be on-site at PDLA Thursday, February 27, 1997 to meet with you and Mr. Pastorella at 10:00 A.M. Thank you for arranging your schedule this week to accommodate us. I hope we can resolve the matter completely this week if at all possible. I have enclosed directions to the laboratory in South Plainfield. Please contact me at (800) 832-3244 if you need any additional information.

Sincerely,

Susan Puskas, M(AS)C
Laboratory Administrative Manager

enclosure

123565

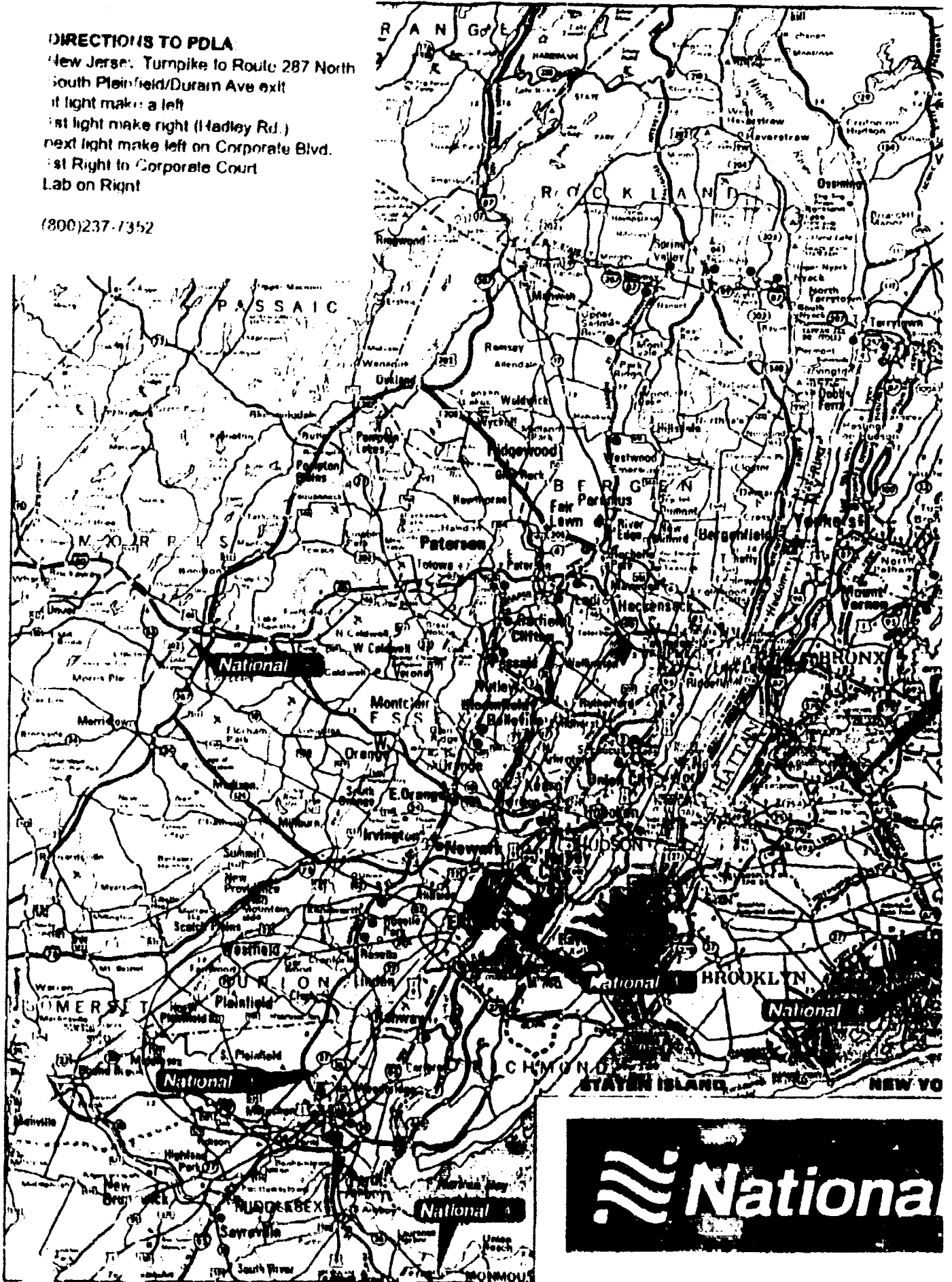
FEB 25 1997

FAX REC'D

DIRECTIONS TO PDLA

New Jersey Turnpike to Route 287 North
South Plainfield/Duram Ave exit
1st light make a left
1st light make right (Hadley Rd.)
next light make left on Corporate Blvd.
1st Right to Corporate Court
Lab on Right

(800)237-7352





February 19, 1997

To: Peter Pastorelle, NDL, fax 914 737-9244

From: Susan Puskas, MEDTOX, ph 800 832-3244, fax 612 636-5351

RE: Radioactive Waste, PDIA

The following information is taken from packing slips of the radioimmunoassay test kits we received by month and isotope:

Month	Iodine 125 mCi	Cobalt 57 mCi
12/93	0.053	0.010
1/94	0.093	0.020
2/94	0.058	0.010
3/94	0.062	0.010
4/94	0.053	0.010
5/94	0.019	
6/94	0.122	0.030
7/94	0.044	0.010
11/94	0.053	0.010
12/94	0.069	0.010
	-----	-----
total	0.626	0.120

This information is compiled from all the packing slips we received from December 1993 through December 1994. All clinical testing utilizing RIA kits ceased January 1995 when the clinical business was sold.

I have also attached a copy of the letter we received from Taledyne describing in more detail their survey of the New Jersey site.

Unfortunately, I have not been able to locate in the laboratory records transferred to MEDTOX any documentation concerning dosimetry data on the personnel or the maintenance records of wipe tests and other contamination checks.

If you need copies of the NRC license for 1125 and the DEP license for Co57 I do have copies I can fax. I hope this information is helpful. Please call me if you have any questions concerning this information. Thank you for your help.


**TELEDYNE
BROWN ENGINEERING
Environmental Services**

21 VANDERBILT AVENUE

P.O. BOX 1215

WEAUX, NEW JERSEY 07075-1215

(201) 664-7070 FAX (201) 664-5348

February 13, 1997

Mr. Robert Neville
Medtox Labs
401 W. County Road D
St. Paul, MN 55112

Dear Mr. Neville:

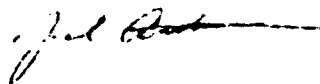
On October 24, 1996, Joel Antkowiak of Teledyne Brown Engineering - Environmental Services visited your PDA facility in Piscataway, New Jersey in order to identify and quantify the radioactivity in several drums for the purpose of determining the best means of disposal. The results of that work are as follows:

1. In the waste storage area, there were seven 55 gallon drums that appeared to have contained toluene-125 waste materials. No residual activity was found in these drums and they can be regarded as non-radioactive.
2. There was also a 55 gallon drum and a 5-gallon pail of materials that had contained cobalt-57 waste materials dated June 28, 1993. No residual activity was found in these drums and they can be regarded as non-radioactive.
3. In another location, there was a 55-gallon drum that contained liquid scintillation vials. The drum was approximately 20 percent full of vials, several of which were counting standards of carbon 14 and tritium. There was no detectable gamma activity. The estimated activity of the vials in the drum is 10 microcuries each of tritium and carbon 14. In addition, the drum had an organic smell that indicated that the scintillation cocktail may have been a volatile organic, such as toluene.

While the materials in the drums (other than the scintillation vials) was not found to be radioactive, the chemical composition of the materials is unknown. This should be considered when disposing of the materials.

If you have any questions or require further assistance, please do not hesitate to contact us.

Sincerely,
TELEDYNE BROWN ENGINEERING
Environmental Services



Joel Antkowiak, Health Physics Supervisor
Radiological Services Department

cc: E. Martos

NRC FORM 374
(10-80)

U.S. NUCLEAR REGULATORY COMMISSION

PAGE 1 OF 2 PAGES

MATERIALS LICENSE

Amendment No. 10

Pursuant to the Atomic Energy Act of 1954, as amended, the Energy Reorganization Act of 1974 (Public Law 93-438), and Title Code of Federal Regulations, Chapter I, Parts 30, 31, 32, 33, 34, 35, 39, 40 and 70, and in reliance on statements and representations hereof made by the licensee, a license is hereby issued authorizing the licensee to receive, acquire, possess, use, 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.

Licensee		In accordance with application received May 13, 1993, 3 License number 29-20536-01 is amended in its entirety to read as follows:	
1. Psychiatric Diagnostic Laboratories of America, Inc.		4 Expiration date July 31, 1998	
2. 100 Corporate Court South Plainfield, New Jersey 07080		5 Docket or Reference No. 030-19309	
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	
A. Indium 115	A. Prepackaged Kits	A. 0 millicuries	
9. Authorized use			
A. In <u>vitro</u> studies.			

CONDITIONS

10. Licensee material may be used only at the licensee's facilities at 100 Corporate Court, South Plainfield, New Jersey.
11. A. Licensed material shall be used by, or under the supervision of, Hasmukh Shah or Joy Jacildo.
B. The Radiation Safety Officer for this license is Hasmukh Shah.
12. The licensee is authorized to hold radioactive material with a physical half-life of less than 65 days for decay-in-storage before disposal in ordinary trash provided:
- A. Radioactive waste to be disposed of in this manner shall be held for decay a maximum of 10 half-lives.
- B. Before disposal as normal waste, radioactive waste shall be surveyed to determine that its radioactivity cannot be distinguished from background. All radiation labels shall be removed or obliterated.

Form 374A

U.S. NUCLEAR REGULATORY COMMISSION

PAGE 2 OF 2 PAGES

MATERIALS LICENSE
SUPPLEMENTARY SHEET

License number

29-20536-01

Docket or Reference number

030-19389

Amendment No. 10

(Continued)

CONDITIONS

- 13. The licensee shall not use licensed material in or on human beings or in field applications where activity is released except as provided otherwise by specific condition of this license.
- 14. 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. The 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 received May 13, 1993
 - B. Letter dated June 7, 1993

JUL 11 1993

JUL 09 1993

For the U.S. Nuclear Regulatory Commission

Original Signed By:
By Michelle Boardley
Nuclear Materials Safety Branch
Region I
King of Prussia, Pennsylvania 19406

REQUIREMENTS FOR MATERIALS LICENSEES

As a holder of an NRC material license, you must:

1. Operate in accordance with NRC regulations contained in 10 CFR Part 19, "Notices, Instructions and Reports to Workers; Inspections," 10 CFR Part 20, "Standards for Protection Against Radiation," and other applicable regulations.
2. Possess radioactive material only in the quantity(ies) and form(s) indicated in your license.
3. Use radioactive material only for the purpose(s) indicated in your license.
4. Notify NRC in writing of any change in mailing address (no fee required if the location of radioactive material remains the same).
5. Request and obtain appropriate amendments if you plan to change the ownership of your organization, change locations of radioactive material, or make any other changes in your facility or program which are contrary to your license conditions or representations made in your license application and any supplemental correspondence with NRC. A license fee may be charged for the amendment as specified in 10 CFR Part 170.
6. Submit a complete renewal application with proper fee or termination request at least 30 days before the expiration date on your license. You should receive a reminder notice approximately 90 days before the expiration date. However, it is your responsibility to file a renewal application at the proper time. Possession of radioactive material after your license expires is a violation of NRC regulations.
7. Request termination of your license if you plan to permanently discontinue activities involving radioactive material.

U.S. NUCLEAR REGULATORY COMMISSION

Page 1 of 2

MATERIALS LICENSE

Amendment No. 07

Under the Atomic Energy Act of 1954, as amended, the Energy Reorganization Act of 1974 (Public Law 93-438), and Title 10 of the Code of Federal Regulations, Chapter I, Parts 30, 31, 32, 33, 34, 35, 40 and 70, and in reliance on statements and representations by the licensee, a license is hereby issued authorizing the licensee to receive, acquire, possess, and transfer by product...

Licensee

Psychiatric Diagnostic Laboratories of America, Inc. 100 Corporate Court South Plainfield, New Jersey 07080

In accordance with application dated February 13, 1987, License Number 29-2052-01 is amended in its entirety to read as follows:

Expiration date: April 30, 1992

Docket or Reference No. 030-19-000

- 6. Is product... 7. Chemical and/or physical form... 8. Maximum amount that licensee may possess at any one time... A. Hydrogen B. Carbon 14 C. Iodine 125 A. Any B. Any C. Bound to non-volatile agent A. 500 microcuries B. 500 microcuries C. 8 millicuries

9. Authorized use

A. through C. Research and development as defined in Section 30.4(q) of 10 CFR Part 30.

CONDITIONS

- 10. Licensed material shall be used only, at 100 Corporate Court, South Plainfield, New Jersey
11. Licensed material shall be used by, or under the supervision of, David Bernot.
12. The licensee may transport licensed material in accordance with the provisions of 10 CFR Part 71, "Packaging and Transportation of Radioactive Material".
13. The licensee is authorized to hold radioactive material with a physical half-life of less than 65 days for decay in-storage before disposal in ordinary trash provided:
A. Radioactive waste to be disposed of in this manner shall be held for decay a minimum of 10 half-lives.
B. Before disposal as normal waste, radioactive waste shall be analyzed to determine that its radioactivity cannot be distinguished from background. All radiation labels shall be removed or obliterated.

NRC Form 374A
(Rev. 1-77)

U.S. NUCLEAR REGULATORY COMMISSION

PAGE 2 OF 2 PAGE

**MATERIALS LICENSE
SUPPLEMENTARY SHEET**

License number	29-70536-01
Docket or Reference number	030-19389
Amendment No.	07

(Continued)

CONDITIONS

- 14. Experimental animals administered licensed materials or their products shall not be used for human consumption.
- 15. 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. The 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 13, 1967

80 APR 1967

Date: _____

For the U.S. Nuclear Regulatory Commission

By *John E. [Signature]*
 Nuclear Materials and
 Safeguards Branch, Division 1
 King of Prussia, Pennsylvania 19406

REQUIREMENTS FOR MATERIALS LICENSEES

As a holder of an NRC material license, you must:

1. Operate in accordance with NRC regulations contained in 10 CFR Part 19, "Notices, Instructions and Reports to Workers; Inspections," 10 CFR Part 20, "Standards for Protection Against Radiation," and other applicable regulations.
2. Possess radioactive material only in the quantity(ies) and form(s) indicated in your license.
3. Use radioactive material only for the purpose(s) indicated in your license.
4. Notify NRC in writing of any change in mailing address (no fee required if the location of radioactive material remains the same).
5. Request and obtain appropriate amendments if you plan to change the ownership of your organization, change locations of radioactive material, or make any other changes in your facility or program which are contrary to your license conditions or representations made in your license application and any supplemental correspondence with NRC. A license fee may be charged for the amendment as specified in 10 CFR Part 170.
6. Submit a complete renewal application with proper fee or termination request at least 30 days before the expiration date on your license. You should receive a reminder notice approximately 90 days before the expiration date. However, it is your responsibility to file a renewal application at the proper time. Possession of radioactive material after your license expires is a violation of NRC regulations.
7. Request termination of your license if you plan to permanently discontinue activities involving radioactive material.

Form DEQ-011
5/88

STATE OF NEW JERSEY
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF RADIATION PROTECTION
CN 411, TRENTON NEW JERSEY 08625

RADIOACTIVE MATERIALS LICENSE

Pursuant to the New Jersey Radiation Protection Code, and in reliance on statements and representations heretofore made by the licensee designated below, a license is hereby issued authorizing such licensee to transfer, receive, possess and use the radioactive material(s) designated below; and to use such radioactive materials 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 Department of Environmental Protection, now or hereafter in effect, and to any conditions specified below.

LICENSEE		
1. Name	PSYCHIATRIC DIAGNOSTIC LABORATORIES OF AMERICA	
2. Address	100 Corporate Court So. Plainfield, New Jersey 07080	
3. License Number		NJSL-20278 Amendment #4 Amended in its entirety
4. Expiration Date		December 31, 1994
5. Reference Number		
6. Radioactive Materials (element and mass number)	7. Chemical and/or Physical Form	8. Maximum Quantity Licensee May Possess at Any One Time
A. Cobalt 57	A. Cobalt 57 bound in RIA kit form	A. Unlimited
9. Authorized Use:		
A. Cobalt 57 B-12 Folate Testing (routine medical testing).		
B. Radioactive materials specified in this license may only be stored or used at the Psychiatric Diagnostic Laboratories of America.		
C. The Cobalt 57 used at this facility is not for human use. In vitro studies only.		
10. Radioactive material shall only be used at 100 Corporate Court, South Plainfield.		
11. Radioactive material listed in Conditions 6, 7, and 8 shall be used by or under the supervision of the following:		
David Berner Jeanne Wilhelm Mary Adams Rasmukh Shah Maria Louise Bergeron		
12. Compliance with other U.S. agencies having jurisdiction and regulations for radiopharmaceuticals must be maintained.		

Form 10-044
5/79

STATE OF NEW JERSEY
DEPARTMENT OF ENVIRONMENTAL PROTECTION
DIVISION OF ENVIRONMENTAL QUALITY
BUREAU OF RADIATION PROTECTION
CN 411, Trenton, New Jersey 08645

Page 2 of 7License Number 2027Amendment No. 4

RADIOACTIVE MATERIALS LICENSE

Supplementary Sheet

13. Radioactive material specified in Subitems 6A may be disposed of as non-radioactive waste provided that (a) the radioactive waste is stored behind adequate shielding to meet the requirements of New Jersey Radiation Code 28-6, (b) the radioactive waste is held for ten half-lives of the longest lived radioisotope to be disposed of, (c) the radioactive waste is monitored with a GM meter prior to disposal to insure background levels, (d) all radiation labels will be either removed or obliterated and (e) a log shall be maintained to include the results of the radiation survey and date of disposal.
14. In laboratory areas where small quantities of radioactive materials are used (i.e. less than 200 microcuries):
- Monthly surveys of areas are to be performed and the results documented.
 - Monthly wipe test of areas are to be performed and the results documented.
 - Protective gloves are to be worn by individuals handling radioactive material.
 - Survey decayed radioactive waste prior to disposal to ensure background levels.
 - Radioactive material symbols shall be removed and/or obliterated from all containers no longer containing radioactive material prior to disposal.
15. The licensee shall make the following items available to their staff:
- Copy of the New Jersey Radiation Protection Code.
 - Copy of the New Jersey State Radioactive Material License.
16. The licensee shall post the following items in an area frequented by employees engaged in the use of licensed materials:
- Notice to Employees - PPP 14.
 - Emergency procedures involving water, minor spills including the names and phone numbers of people to contact.
 - Appropriate signs and labels in areas and/or containers and equipment in which radiation and/or radioactive material are contained. These postings are to conform to Subchapter 10 of the Code.

For the Department of Environmental Protection
Division of Environmental Quality

Date: _____

By: _____

Form 19-11
5-86

STATE OF NEW JERSEY
DEPARTMENT OF ENVIRONMENTAL PROTECTION
DIVISION OF ENVIRONMENTAL QUALITY
BUREAU OF RADIATION PROTECTION
CN411, Trenton, New Jersey 08621

Page 3 of 7

License Number 2027
Amendment No. 4

RADIOACTIVE MATERIALS LICENSE

Supplementary Sheet

17. The following tests shall be performed as a minimum:

A. Surveys of:

1. All radioactive materials received.
2. All radioactive waste decayed to background levels prior to release.
3. Uncontrolled areas where sealed and unsealed sources are routinely used to be surveyed on days they are used.
4. Controlled area, daily.
5. Personnel at the end of the day.

B. Air tests of:

1. Controlled and uncontrolled area where unsealed sources of radioactive material are routinely used, weekly.

18. The following records shall be maintained:

A. Radioactive materials received including but not necessarily limited to date of receipt, radionuclide, activity, mass or volume of material, results of package survey, instrument used for surveys and surveyor's initials.

B. Radioactive material disposals including but not necessarily limited to:

1. Disposals to Vendor: nuclide, activity, vendor name, quantity, date of disposal.
2. Disposal by Decay: Results of survey of the waste, date of survey, date of waste disposal, instrument used, and surveyor's initials.
3. Disposal to Sanitary Sewer: nuclide, activity, volume of dilution waste per day, date of disposal.
4. Disposal to Air: nuclide, activity, volume of dilution air, nuclide concentration in air, date of disposal.

C. Survey instrument calibration at intervals not to exceed six months or annual calibration with documented quarterly consistency checks.

D. Surveys performed in controlled and uncontrolled areas including but not necessarily limited to survey results, instrument used, date performed and surveyor's initials.

For the State of New Jersey
Department of Environmental Protection

Date _____

By _____

Form 10-044
5/79

STATE OF NEW JERSEY
DEPARTMENT OF ENVIRONMENTAL PROTECTION
DIVISION OF ENVIRONMENTAL QUALITY
BUREAU OF RADIATION PROTECTION
CN 411, Trenton, New Jersey 08647

Page 4 of 20

License Number 20276
Amendment No. 4

RADIOACTIVE MATERIALS LICENSE

Supplementary Sheet

- F. Wipe tests performed in controlled and uncontrolled areas including but not necessarily limited to test results in dpm, date performed, instrument used and surveyor's initials.
 - F. Personnel dosimetry records including but not necessarily limited to name, birthdate, social security number, and prior employment exposure history.
 - G. Daily personnel monitoring results including but not necessarily limited to instrument used, date performed and initials.
19. Protective equipment and clothing including but not necessarily limited to remote handling equipment, adequate shielding, laboratory coats and disposable gloves shall be used by personnel while utilizing radioactive material.
 20. Eating, drinking, smoking and applying cosmetics shall not be permitted in controlled areas.
 21. Except as specifically provided by this license, the licensee may possess and use radioactive material described in this license only in accordance with statements, representations and procedures contained in application dated July 23, 1986 and letters dated April 10, 1987, April 16, 1987 and September 25, 1987.

For the State of New Jersey
Department of Environmental Protection

By: M. [Signature]

By: [Signature]