

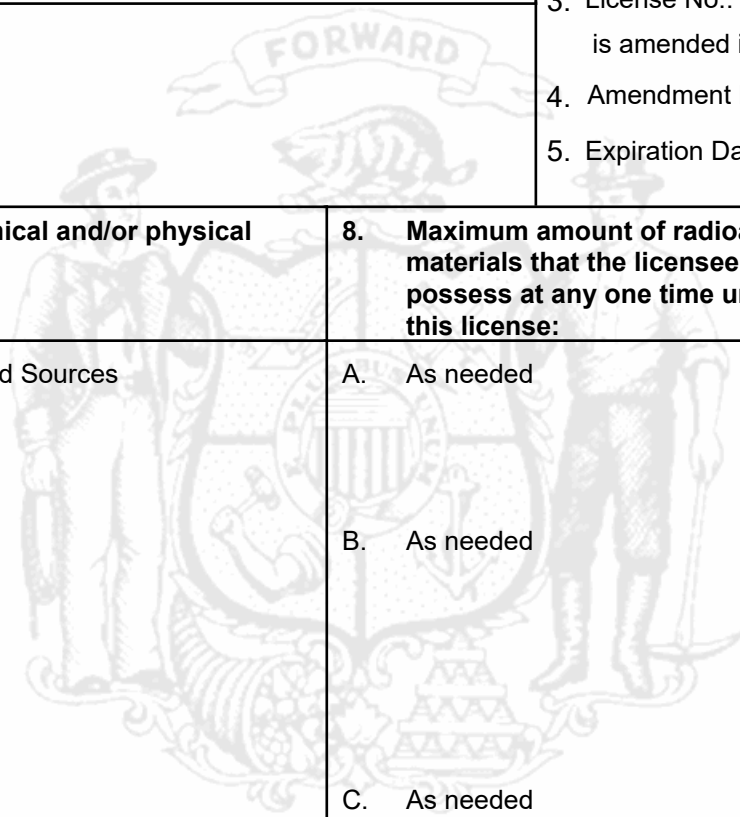
**STATE OF WISCONSIN**  
**DEPARTMENT OF HEALTH SERVICES**  
 Bureau of Environmental and Occupational Health

**RADIOACTIVE MATERIALS LICENSE**

Under Wisconsin Stat. §.254.365 and Wisconsin Administrative Code chapter DHS 157, in reliance on statements and representations made by the licensee, a license is issued authorizing the licensee to receive, acquire, possess and transfer radioactive material designated below; to use the material for the purpose(s) and at the place(s) designated below; and to deliver or transfer the material to persons authorized to receive it in accordance with Chapter DHS 157, Wisconsin Administrative Code. This license is subject to all applicable rules and orders of the Wisconsin Department of Health Services (DHS) including Chapter DHS 157, Wisconsin Administrative Code now or hereafter in effect, and to conditions specified below:

<p><b>Licensee Name and Address</b></p> <p>1. RAM Services, Incorporated</p> <hr/> <p>2. 510 County Hwy V Two Rivers, WI 54241</p>	<p>In accordance with letter dated September 20, 2022,</p> <p>3. License No.: 071-1234-01 is amended in its entirety to read as follows:</p> <p>4. Amendment No.: 34</p> <p>5. Expiration Date: June 30, 2025</p>
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6. Radioactive material	7. Chemical and/or physical form	8. Maximum amount of radioactive materials that the licensee may possess at any one time under this license:	9. Authorized Use:
A. Any radioactive material	A. Sealed Sources	A. As needed	A. Handling at clients' facilities incident to installation, relocation, removal, servicing, packaging, and shipping of gauging devices.
B. Any radioactive material	B. Any	B. As needed	B. Possession only at clients' facilities, incident to wipe/smear collection, leak test sample collection, environmental sample collection, decontamination of facilities, and waste packaging.
C. Any radioactive material except special nuclear	C. Any	C. As needed	C. Handling or overencapsulation of sealed



**RADIOACTIVE MATERIALS LICENSE**

Supplementary Sheet

License Number: **071-1234-01**

Amendment No.: **34**

6. Radioactive material	7. Chemical and/or physical form	8. Maximum amount of radioactive materials that the licensee may possess at any one time under this license:	9. Authorized Use:
material in quantities sufficient to form a critical mass			or leaking sources not in devices, incident to removal, packaging, and shipping.
D. Any radioactive material	D. Unsealed form	D. 10 millicuries per isotope and 100 millicuries total	D. Analysis of the licensee's and clients' leak test samples.
E. Any radioactive material	E. Liquid samples	E. Not to exceed 50 times limits described in DHS 157, Appendix F, per nuclide	E. Possession of quench standards and customer liquid waste samples for analysis.
F. Cesium-137	F. Sealed Sources	F. 600 millicuries per source and 600 millicuries total	F. In a J.L. Shepherd Model 28-6A irradiator to calibrate the licensee's and clients' survey instruments.
G. Depleted Uranium	G. Metal	G. 2500 kilograms total	G. Shielding for sealed sources.
H. Any radioactive material except special nuclear material in quantities sufficient to form a critical mass	H. Sealed Sources	H. Not to exceed 1 curie per nuclide, except as follows: Americium-241:Be: 50 curies Cesium-137: 65 curies Krypton-85: 10 curies Promethium-147: 20 curies Strontium-90: 17 curies Cobalt-60: 10 curies Hydrogen-3: 400 curies Nickel-63: 20 curies Iron-55: 3 curies Plutonium: 200 grams	H. Receipt, possession, storage, and packaging of sealed sources, incident to transfer to licensed recipients, a licensed disposal site, and QSA Global.
I. Any radioactive material except special nuclear material	I. Unsealed form	I. Not to exceed 100 times limits described in DHS 157, Appendix I, per nuclide, and sum of ratios may not exceed 1 ("unity")	I. Receipt, possession, and storage, as prepackaged waste, incident to transfer to a licensed processor or licensed disposal site.

**RADIOACTIVE MATERIALS LICENSE**

Supplementary Sheet

License Number: **071-1234-01**

Amendment No.: **34**

6. Radioactive material	7. Chemical and/or physical form	8. Maximum amount of radioactive materials that the licensee may possess at any one time under this license:	9. Authorized Use:
J. Pm-147 and Fe-55	J. Sealed Sources	J. 20 curies total for each nuclide	J. Source replacement at client facilities.
K. Any radioactive material	K. Liquid or solid	K. 0.1 microcurie per isotope and 1 microcurie total	K. Analysis of the licensee's and clients' samples by gamma spectroscopy for isotopic and activity determinations.
L. Depleted Uranium	L. Metal	L. 7500 kilograms total	L. Repackaging for disposal, transfer, and return to the generator.
M. Strontium-90	M. Sealed Sources (Eckert & Ziegler, Isotope Products, Model SIF.D1)	M. 57.5 millicuries per source and 1 Curie total	M. Possession, use, and source capsule exchange of the Electronic Systems, Inc. model ISOSINT gauge, incident to distribution to general licensees.
N. Krypton-85	N. Sealed Sources (Eckert & Ziegler Isotope Products, Model KAC.D3 or KAC.D4)	N. 1150 millicuries per source and 20 Curies total	N. See Authorized Use 9.M.
O. Californium-252	O. Sealed Sources (Frontier Technology Corporation, Model FTC-100S; QSA Global, Model CVN.CY9)	O. 43.5 millicuries per source and 43.5 millicuries total	O. Possession, use, and source capsule exchange of Real Time Instruments model Allscan gauges.

**CONDITIONS**

10. A. Licensed material in subitems 6.A., and 6.B. may only be used at temporary jobsites of the licensee anywhere in Wisconsin where the Department of Health Services maintains jurisdiction for regulating the use of licensed material.
- B. Licensed material in subitems 6.D. through 6.F. may be stored and used only at the licensee's facilities located at 510 County Highway V, Two Rivers.
- C. Licensed material in subitems 6.C., 6.G., 6.J. through 6.O. may be used or stored at the licensee's facilities located at 510 County Highway V, Two Rivers, or at temporary jobsites of the licensee anywhere in Wisconsin where the Department of Health Services maintains jurisdiction for regulating the use of licensed material.

RADIOACTIVE MATERIALS LICENSE

Supplementary Sheet

License Number: **071-1234-01**

Amendment No.: **34**

- D. Licensed material in subitem 6.H. may be received, stored and packaged only at the licensee's facilities located at 510 County Highway V, Two Rivers, incident to transfer to license-authorized recipients or a licensed disposal site.
- E. Licensed material in subitem 6.I. may be received and stored only at the licensee's facilities located at 510 County Highway V, Two Rivers, incident to transfer to a licensed disposal site.
11. A. The Radiation Safety Officer for this license is Jerry P. Wiza.
- B. The alternate Radiation Safety Officer for this license is Rick Parlato.
12. A. Licensed material listed in subitem 6.A. shall be used by, or under the supervision and in the physical presence of, Jerry P. Wiza, Rick Parlato, or Rusty Barrett, using procedures submitted in the application dated March 30, 2020.
- B. Licensed material listed in subitem 6.C. shall be use by, or under the supervision and in the physical presence of, Jerry P. Wiza, Rick Parlato, or Rusty Barrett, using procedures submitted in the letter dated June 23, 2020, and licensed material listed in subitem 6.C. shall be overencapsulated only by Jerry P. Wiza or Rusty Barrett.
- C. Licensed material listed in subitems 6.B., 6.D. through 6.I., or 6.K. through 6.O. shall be used by, or under the supervision and in the physical presence of, Jerry P. Wiza or Rick Parlato, using procedures submitted in the application dated March 30, 2020.
- D. Licensed material listed in subitems 6.D. or 6.E. shall be used by, or under the supervision individuals trained on procedures submitted in application dated March 30, 2020.
- E. Licensed material listed in subitem 6.J. shall be used by, or under the supervision and in the physical presence of, Jerry P. Wiza, Rick Parlato, or Rusty Barrett, using procedures submitted in the application dated March 30, 2020, and source replacement at client facilities must only be performed by Jerry Wiza or Rusty Barrett.
13. The licensee is authorized to transport licensed material in accordance with the provisions of Chapter DHS 157, Subchapter XIII, Transportation.
14. The licensee shall conduct a physical inventory every 6 months, or at other intervals approved by DHS, to account for all unsealed radioactive material, sealed sources, and/or devices received and possessed under the license. Records of inventories shall be maintained for 5 years from the date of each inventory and shall include the radionuclides, quantities, manufacturer's name and model numbers, location of sealed sources and/or devices, and the date of the inventory.

RADIOACTIVE MATERIALS LICENSE

Supplementary Sheet

License Number: **071-1234-01**

Amendment No.: **34**

15. Sealed sources or detector cells shall not be opened or altered by the licensee.
16. The licensee may not possess any radioactive material authorized under subitems 6.H. or 6.I. for periods greater than 24 months without specific written DHS approval. The licensee shall notify the Supervisor of the Radioactive Materials Program if licensed material listed under subitem 6.H. or 6.I. has been in possession of the licensee for 21 months or if the licensee cannot assure the transfer of radioactive material to an authorized recipient, commensurate with the authorized uses.
17. A. The licensee shall inform the Supervisor of the Radioactive Materials Program in writing upon anticipation of receipt of quantities at or above the limits specified in Table 1, Radionuclides of Concern.  
  
B. The licensee shall inform the Supervisor of the Radioactive Materials Program in writing within 7 calendar days when the possession limits described in the letter dated May 31, 2022 are no longer needed.
18. The licensee may not possess any radioactive material authorized under subitem 6.J. for periods greater than 365 days without specific written DHS approval.
19. Sealed sources authorized under subitem 6.H., when possessed in accordance with the QSA Global letter dated December 4, 2013, may be possessed for periods greater than 180 days.
20. The licensee is authorized to overencapsulate sealed sources (excluding special nuclear material) using Special Form Certificates USA/0695/S-96 or USA/0696/S-96 at client facilities or at the licensee's facility using procedures submitted in the letter dated June 23, 2020.
21. The licensee is authorized to receive sealed source replacement capsules of Pm-147 and Fe-55 from the source manufacturer at the address listed in Item 2 of the license and exchange the capsules at the client's facility in accordance with the letter dated July 7, 2020.
22. The licensee may collect radioactive sources authorized under subitem 6.H. in accordance with application dated March 30, 2020 for disposal through the Off-site Source Recovery Project (OSRP). The licensee will confirm acceptability of these radioactive sources with OSRP prior to receipt.
23. In addition to the possession limits in Item 8, the licensee shall further restrict the possession of licensed material to quantities below the minimum limit specified in DHS 157.15 for establishing decommissioning financial assurance.

**RADIOACTIVE MATERIALS LICENSE**

Supplementary Sheet

License Number: **071-1234-01**Amendment No.: **34**

24. A. Sealed sources used by the licensee containing licensed material shall be registered pursuant to 10 CFR 32.210 or equivalent Agreement State regulations.
- B. No single sealed source shall exceed the maximum activity specified in the certificate of registration issued by the NRC or an Agreement State.
25. In lieu of s. DHS 157.13(4)(i); s. DHS 157.68(2)(a); s. DHS 157.61(1)(b) and (c); s. DHS 157.61(4)(b); s. DHS 157.61(5), (7) to (10), and (12); s. DHS 157.63(3) to (6); s. DHS 157.64(1) and (4) to (8); s. DHS 157.65(1), (8) to (10); s. DHS 157.66; s. DHS 157.67(1), (4), (15), (17), and (18); s. DHS 157.72(1); s. DHS 157.94(5); s. DHS 157.9708(4); and s. DHS 157.9719, the licensee shall comply with Title 10, Code of Federal Regulations:
- (a) Part 30 section 30.34(g);
  - (b) Part 32 section 32.72; and
  - (c) 35.2 Definitions: Associate Radiation Safety Officer, Ophthalmic Physicist; and
  - (d) Part 35 sections 35.24(b), 35.24(c), 35.40(b), 35.41, 35.50, 35.51, 35.55, 35.57, 35.190, 35.204, 35.290, 35.300, 35.390, 35.392, 35.394, 35.396, 35.400, 35.433, 35.490, 35.491, 35.500, 35.590, 35.600, 35.610, 35.655, 35.690, 35.3045, and 35.3204; and
  - (e) Part 37 sections 37.77(a) and 37.43(d); and
  - (f) Part 71 section 71.97.
- Except as follows:
- (a) Any reference to the Commission or NRC shall be deemed to be a reference to the Wisconsin Department of Health Services, except:
    - a. References to "NRC or Agreement State", "Commission or an Agreement State", or "Commission or Agreement State" shall be deemed to be a reference to "Wisconsin Department of Health Services, NRC, or an Agreement State";
    - b. References to Commission master materials licensees, permittees, permits, permittees of broad scope, and broad scope medical use permittees; and
    - c. References to NRC's Medical Uses Licensee Toolkit web page; and
    - d. References to the NRC Web site; and
    - e. References to U.S. Nuclear Regulatory Commission as part of a mailing address.
  - (b) License required reports of events or notifications in 30.34(g), 35.204, 35.3204, 35.3045, and 37.77(a) shall use DHS contact information in DHS 157.13(17).
26. Wisconsin Administrative Code Chapter DHS 157 shall govern unless the statements, representations, and procedures in the licensee's application and correspondence are more restrictive than the rule. 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.
- A. Application, with attachments, dated March 30, 2020 and signed by Jerry Wiza.

RADIOACTIVE MATERIALS LICENSE

Supplementary Sheet

License Number: **071-1234-01**

Amendment No.: **34**

- B. Letter dated June 18, 2020 and signed by Jerry Wiza.
- C. Letter, with attachments, dated June 23, 2020 and signed by Jerry Wiza.
- D. Letter dated July 7, 2020 and signed by Jerry Wiza.



**SIGNATURE** - Materials Program Supervisor

2023/01/30  
Date Signed