

U.S. NUCLEAR REGULATORY COMMISSION		Conversation Date: 9/19/01
<b>TELEPHONE CONVERSATION RECORD</b>		Time: 3:30 pm
Mail Control No.: 130090 and 130308	License No.: 29-00139-02	Docket No.: 030-05222
Licensee/Applicant Participant(s): Michael Vala, Radiation Safety Officer	Organization: Squibb	Telephone No.: (732) 519-2987
Person(s) Calling: Pamela J. Henderson		
Subject: Letter dated 7/18/01		
<p>Summary:</p> <p>The licensee called to determine the status of their amendment request in the letter dated 7/18/01 (130090). The amendment requested many changes to possession limits and uses since they are no longer manufacturing commercial radioactive drugs. The amendment also included a decommissioning plan.</p> <p>The RSO needs the changes to possession limits and uses ASAP. Therefore he requested that the decommissioning plan be reviewed as a separate action, since it will require more extensive review. The decommissioning plan is now a separate action (130308)</p>		
Action Required/Taken: File		
Prepared By: P. Henderson	Date: 9/19/01	

**From:** Pamela Henderson  
**To:** Michael.vala@bms.com  
**Date:** 9/20/01 10:04AM  
**Subject:** Decommissioning Plan

29-00139-02, 030-05222, 130308

These questions concern the DECOMMISSIONING PLAN received in Region I on July 27, 2001.

Please confirm that no isotopes with atomic numbers exceeding 83 (alpha-emitters) were used in the areas to be decommissioned (building 124).

Please confirm that any decommissioning contractors that you employ will operate under your license.

Please identify any SOPs you may develop that cannot be conducted under the currently approved procedures and conditions of your license. This may include but not be limited to: scabarding, removal of the tanks, sand-blasting. Submit your procedures for these SOPs which should include methods for air sampling, if needed; protective clothing; measures to prevent spread of contamination; surveys that will be conducted during these operations; instrumentation; etc.

Please confirm that decommissioning involving sectioning of any large items may be done under currently approved procedures and conditions of your license. Otherwise, submit the SOPs for these operations as indicated above.

Your decommissioning plans mentions incineration as a method of waste disposal. Your current license does not permit you to incinerate. Please confirm that any incineration of your waste will be done after you have transferred your waste to a licensed waste broker.

Your decommissioning plan commits to using MARSSIM methodology and the contamination limits (DCGLs) in Regulatory Guide 1.86. One potential pitfall with this combination is that MARSSIM requires that you use instrumentation that enables you to detect to the limits in 1.86 and most portable scanning instruments cannot detect to these limits. Thus, please ensure that you employ methods other than portable scanning devices to enable you to detect to the limits in 1.86.

Please specify whether or not this decommissioning plan is meant to satisfy the requirements of the current condition 22 of your current license (amendment 98) regarding submission of a revised decommissioning **funding** plan?

Please submit a written reply to my attention at the Region I Office and refer to Mail Control No. 130308. If you have any technical questions regarding this deficiency letter, please call me at (610) 337-6952. You may send your response by facsimile: (610) 337-5269. If you choose to send your response by fax, you do **not** need to also send us your response by mail.

Pamela J. Henderson  
Senior Health Physicist

Branch 2  
Division of Nuclear Materials Safety