



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION I
475 ALLENDALE ROAD
KING OF PRUSSIA, PENNSYLVANIA 19406-1415

December 16, 2004

Docket No. 03006021
Control No. 135858

License No. 37-01665-01

David E. Greenley, Ph.D.
Director of Technology Operations
Rohm & Haas Company
Spring House Technical Center
727 Norristown Road
P.O. Box 904
Spring House, PA 19477-0904

SUBJECT: ROHM & HAAS COMPANY, REQUEST FOR ADDITIONAL INFORMATION
CONCERNING APPLICATION FOR RENEWAL OF LICENSE, CONTROL NO.
135858

Dear Dr. Greenley:

This is in reference to your application dated October 1, 2004 requesting to renew Nuclear Regulatory Commission License No. 37-01665-01. In order to continue our review, we need the following additional information:

1. For item 5 you have requested nickel-63 plated sources. Your current license has a maximum possession limit of 700 millicuries for these sources. You did not specify a maximum possession limit for these in your renewal application. Please provide a current inventory of all your nickel-63 plated sources or foils, indicating the manufacturer and model number of each source and specify a maximum possession limit for these sources.
2. In your cover letter you request to have the Rohm and Haas Philadelphia Plant removed as a facility where licensed material may be used. If nickel-63 gas chromatograph electron capture detectors (GC ECDs) were the only licensed material ever used at the Philadelphia Plant please state so and confirm that you never had any leaking sources at the Philadelphia Plant. You mention "a very few special one-time projects" were conducted at the Philadelphia Plant. If any of these projects involved licensed material other than sealed sources or nickel-63 GC ECDs, please provide specific information as to the radionuclides, dates used, amounts of activity and how the licensed material was used.
3. Please confirm if you want the Rohm and Haas Croydon Plant on River Road in Bristol, Pennsylvania to remain on the license as a facility where licensed material may be used. Your license amendment to remove the Bristol Plant (control number 135349) has been approved.

4. You have requested increased flexibility in making program changes as discussed in NUREG-1556, Vol. 11 page 1-4. Please confirm that staff will be trained in any revised procedures prior to implementation and that your audit program will evaluate the effectiveness of the changes.
5. Please provide additional clarification about your training program for individuals who may work with or around byproduct materials. Specifically, confirm that byproduct materials safety training is provided prior to individuals beginning their work
6. You have indicated some exceptions when the Radiation Safety Committee (RSC) would not need to review certain projects. It is not clear from these statements if your RSC will review and approve all protocols and how often they will be re-evaluated. Generic protocols may be approved that have similar risks but each type of use should be evaluated and periodically permits issued by the RSC should be re-evaluated. Please clarify.

Conditions 13 and 14 on your current license prohibiting the use of licensed material in field applications and prohibiting the use of animals that have been administered licensed material being used for human consumption are standard license conditions on most broad scope licenses and will remain on your license.

In accordance with 10 CFR 2.390, a copy of this letter will be placed in the NRC Public Document Room and will be accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html>.

We will continue our review upon receipt of this information. Please reply to my attention at the Region I Office and refer to Mail Control No. 135858. If you have any technical questions regarding this deficiency letter, please call John Nicholson at (610) 337-5236.

In order to continue prompt review of your application, we request that you submit your response to this letter within 30 calendar days from the date of this letter.

Sincerely,

Original signed by Thomas K. Thompson

Thomas K. Thompson
Senior Health Physicist
Commercial and R&D Branch
Division of Nuclear Materials Safety

Enclosure:
10 CFR Parts 19, 20, and 30

cc:
Alan M. Rothman, Ph.D., Radiation Safety Officer

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