

From: John Nicholson
To: Cavallone@ledoux.com
Date: Tue, Apr 5, 2005 8:40 AM
Subject: Ledoux renewal mail control no. 136178

RE: Ledoux & Co.
NRC license no. SNM-296
Docket no. 070-00314
mail control no. 136178

Dear Mr. Avallone,

I received your complete renewal application dated March 30, 2005. In order to continue my review I need some additional information.

1. In Appendix C Item No. 10 for Material Receipt and Accountability, you did not check the box next to the statement "We will conduct physical inventories of sealed sources of licensed material at intervals not to exceed 6 months." Please see related request 3 below. Please confirm whether or not you have sealed sources on hand. If so, please state that you will perform a physical inventory at the prescribed interval.
2. For the same section, you did not check the box next to the statement "We have developed and will implement and maintain written procedures for licensed material accountability and control to ensure that:...". You must have procedures in place that ensure that you are meeting the four bullet items in this section. Please state that you will develop, implement and maintain written procedures that ensure each of the items listed under Material Receipt and Accountability in Appendix C.
3. In Appendix C Item No. 10 Leak Test, you have checked the second box. This would indicate you have sealed sources on hand that require leak testing. Please provide information regarding the manufacturer, model number, radionuclide and amount of activity for your sealed sources that require leak testing or confirm that you have no sealed sources on hand.
4. As we discussed on the phone on Monday April 4, you included an earlier version of your Decommissioning Funding Plan (DFP) with your renewal application. The April 1995 version you included totaled \$76K. Your DFP was revised in December 1995 and totaled \$56K, hence your financial assurance in the amount of \$60K. Since the DFP was last reviewed almost ten years ago, you will have to review it and at a minimum update the \$56K to what the cost would be today. I will proceed to review your license renewal application upon receipt of the additional information I am requesting with this email. We will deal with the financial assurance issue under a different mail control number and action. This will allow us to move forward with the renewed license and deal with the issue of financial assurance separately. I will follow up with you on the financial assurance in a separate email. You do not have to send me a copy of the December 1995 DFP since we have a copy on file and we will be requesting you submit an updated one anyway.
5. In Attachment 1 Information in Support of License Renewal Application for Item 8 please describe how you will assess the effectiveness of the training you provide (written or oral exam, observing personnel, auditing work practices, etc.). Describe the qualifications of the instructors and the methods of instruction. Describe the DOT HazMat training you conduct for personnel who may prepare shipments of licensed material. Specifically for the training you conduct for your custodial and maintenance staff, what is the frequency of the training? Do custodial and maintenance personnel receive awareness training prior to working in areas where licensed material is used or stored?
6. In Attachment 1 Information in Support of License Renewal Application for Item 9 you mention a HEPA filtering system for chemical fume hood exhaust. How is this monitored for effectiveness? How do you know when to change out the filters? Are there procedures in

place describing how the HEPA filter system is monitored and maintained. You do not have to submit these procedures.

7. In Attachment 1 Information in Support of License Renewal Application for Item 10, please provide a description of the instrumentation that will be used to perform the required surveys (portable survey instruments) other than the equipment you have described in Item 9 in Attachment 1 Information in Support of License Renewal Application.

8. In Attachment II Resumes and Qualifications of RSO and Authorized Users, please provide additional details regarding the radiation safety related training for your new authorized user Karl Kivulis. List the types and quantities of licensed material Mr. Kivulis will be using. Describe his work experience with licensed material. What has he worked with (radionuclides, maximum amounts of activity) and how long has he worked with it? In general, describe what has he used the licensed material for. Provide details for radiation safety related training such as topics covered, when the training was completed, the duration of the training and where the training was received.

9. In Attachment III Facility Diagram, please indicate the dimensions of the area shown or the scale. Please describe the facilities where licensed material will be used or stored. Include a description of the areas assigned for the receipt, storage, security and use of licensed material. Appendix F of NUREG-1556, Volume 17 might be helpful in drafting your response.

10. Please provide an email address for your management representative, Bruce Peterson, General Manager, so that I may follow up with both of you regarding the financial assurance issue.

I will continue my review of your renewal application upon receipt of this information. Please reply to my attention at the Region I office at:

Licensing Assistant Section
Division of Nuclear Materials Safety
U.S. Nuclear Regulatory Commission
Region I
475 Allendale Road
King of Prussia, PA 19406-1415

and refer to Mail Control No. **136178**. Please note we can not accept an email response for information that will be incorporated as part of your license. You may send a letter or fax to 610-337-5269. The cover sheet of your fax or the cover letter must be signed by your management representative and the mail control number included. If you have any questions regarding this request for additional information contact me.

In order to continue prompt review of your application I request that you submit your response to this email by Monday April 25, 2005.

Sincerely,

John Nicholson
Health Physicist
U.S. NRC
Commercial and R&D Branch
610-337-5236
jjn@nrc.gov

Mail Envelope Properties

(4252873F.53B : 10 : 35276)

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Recipients

ledoux.com

Cavallone (Cavallone@ledoux.com)

Post Office**Route**

ledoux.com

Files

MESSAGE

Size

8486

Date & Time

Tuesday, April 5, 2005 8:40 AM

Options

Expiration Date:

None

Priority:

Standard

Reply Requested:

No

Return Notification:

None

Concealed Subject:

No

Security:

Standard