



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

July 13, 2005

Docket No. 03014313
Control No. 136379

License No. 52-10510-04

Jorge I. Velez Arocho, Ph.D.
Rector (Chancellor)
University of Puerto Rico
Mayaguez Campus
P.O. Box 9050
Mayaguez, PR 00681-9050

**SUBJECT: UNIVERSITY OF PUERTO RICO, REQUEST FOR ADDITIONAL
INFORMATION CONCERNING APPLICATION FOR RENEWAL OF LICENSE,
CONTROL NO. 136379**

Dear Dr. Velez Arocho:

This is in reference to your application dated January 28, 2005 requesting to renew Nuclear Regulatory Commission License No. 52-10510-04. In order to continue our review, we need the following additional information:

1. In your application, you did not fully describe the roles and responsibilities of the Radiation Safety Committee (RSC). Please provide the following:
 - a. Section 2.1 of your application states that the Radiation Safety Officer (RSO) is responsible for authorizing new and ongoing experiments previously approved by the RSO. Section B.2 of your application describes the approval process for experiments by the RSO. RSO Form 001 contains instructions for procurement and use of radioisotopes and delineates the responsible party as the RSO. 10 CFR 33.13 requires that the RSC review and approve and record safety evaluations of proposed uses of byproduct material. Describe the criteria the RSC will use to review and approve facilities, equipment, users and uses of radioactive materials. Describe how you will perform this function without meeting more than once a year*;
 - b. Describe the audits and oversight which will be performed by the RSC and the Radiation Safety Officer (RSO) (See Appendix M of NUREG 1556, Vol. 11).
 - c. Provide a delegation of authority for the RSO (See Appendix J of NUREG 1556, Vol. 11).

*Section 8.7.2 of NUREG-1556, Volume 11 addresses the roles and responsibilities of the Radiation Safety Committee and may be helpful in developing your response.

2. If licensed materials are to be used in animals, please submit:

- a. a description of the animal housing facilities,
- b. a description of the training that will be provided to individuals caring for animals containing licensed materials, and
- c. a copy of the instructions provided to animal caretakers for handling of animals, animal waste carcasses, and cleaning and decontamination of animal cages.

Appendix H of NUREG-1556, Volume 7 addresses considerations for laboratory animal uses and may be helpful to you in developing a response.

3. 10 CFR 20.2003(a)(1) requires that a licensee may discharge licensed material into sanitary sewerage if the material is readily soluble (or is readily dispersible biological material). Information Notice 94-07 (enclosed) provides methods for determining compliance with this requirement which are acceptable to the U.S. Nuclear Regulatory Commission.

Please review this Information Notice and provide specific information as to how you will assure that your releases to the sanitary sewerage system will meet the solubility criteria in 10 CFR 20.2003(a)(1). If you wish, you may indicate that you will use one of the methods described in Information Notice 94-07. Otherwise, describe your alternative methodology including the models, calculations, analytical techniques, and quality control measurements as well as the records that will be maintained.

In addition, provide calculations to show compliance with 10 CFR 20.2003(a)(2)(3)(4) and confirm that records will be maintained of all disposals made into the sanitary sewage system.

4. 10 CFR 30.32(g) requires that an application for a specific license to use byproduct material in the form of a sealed source or in a device that contains a sealed source must either identify the source or device by manufacturer and model number as registered with the U.S. Nuclear Regulatory Commission under 10 CFR 32.210 or with an Agreement State; **or** contain the information identified in 10 CFR 32.210(c). Please provide this information for the sealed source(s) requested in your application.
5. Appendix C, Item C.1 of your application refers to posting of radioactive areas. You reference 10 CR 20.203. The current regulation reference for posting requirements is 10 CFR 20.1902. Please revise your procedure.
7. Item B.3.2 of your application states that you will perform an inventory at least one a year. Condition 17 of your license requires that you perform inventory of sealed sources every six months. Confirm that you will perform an inventory every six months. Please describe how you will ensure that you will not exceed your possession limits if you are conducting an inventory of unsealed material only once a year.

Current NRC regulations and guidance are available at the NRC web site at <http://www.nrc.gov/materials/miau/mat-toolkits.html> and <http://www.nrc.gov/who-we->

J. Velez Arocho
University of Puerto Rico

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[are/governing-laws.html](#) or by contacting the Government Printing Office (GPO) toll-free at 1-888-293-6498. The GPO is open from 7:00 a.m. to 9:00 p.m. EST, Monday through Friday (except Federal holidays).

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. 136379. If you have any technical questions regarding this deficiency letter, please call me at (610) 337-5040.

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 Elizabeth Ullrich

Elizabeth Ullrich
Senior Health Physicist
Commercial and R&D Branch
Division of Nuclear Materials Safety

cc:
Roberto Torres-Martinez, Radiation Safety Officer

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