



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

July 21, 2005

Docket No. 03000996
Control No. 137292

License No. 37-10424-02

K. Ramachandra Bhat, Ph.D.
Radiation Safety Officer
Lincoln University Of the Commonwealth System of Higher Education
School of Natural Science & Math
Lincoln University, PA 19352

SUBJECT: LINCOLN UNIVERSITY OF THE COMMONWEALTH SYSTEM OF HIGHER EDUCATION, REQUEST FOR ADDITIONAL INFORMATION CONCERNING APPLICATION FOR RENEWAL OF LICENSE, CONTROL NO. 137292

Dear Dr. Ramachandra Bhat:

This is in reference to your application dated June 22, 2005 requesting to renew Nuclear Regulatory Commission License No. 37-10424-02. In order to continue our review, we need the following additional information:

1. On the application, the name of license was listed as School of Natural Science & Math Lincoln University. On the current license, the name of the licensee is Lincoln University of the Commonwealth System of Higher Education. Please confirm the legal name of the University and the full proper mailing address.
2. The application did not request the maximum quantities of the different types of radionuclides. Please state the maximum quantities in millicuries for each type of radionuclide requested.
3. The application did not list the specific use or purpose of Iodine 125 and Iodine 131. Please list the specific use or purpose of Iodine 125 and Iodine 131.
4. The application did not describe any use of shielding. Shielding may be needed depending upon the type, concentration, and amount of radionuclides used or stored at one time. Please submit a description of available shielding or demonstrate that shielding is not needed.

5. Provide a brief resume of the training and experience of Dr. Amar Tung, who will directly supervise the use of material or will use material without supervision. The resume should include the type (on-the-job or formal course work), location, and duration of the training. Training should cover (a) principles and practices of radiation protection, (b) radioactivity measurements, standardization, and monitoring techniques and instruments, (c) mathematics and calculations basic to the use and measurement of radioactivity, and (d) biological effects of radiation. The description of the use of licensed materials should include the specific isotopes handled, the maximum quantities of materials handled, where the experience was gained, the duration of experience, and the type of use.
6. Provide a brief resume of the training and experience of Dr. K. Ramachandra Bhat and anyone else who will use, or supervise the use of, Iodine 125 and Iodine 131. The resume should include the type (on-the-job or formal course work), location, and duration of the training. The description of the use of licensed materials should include gamma emitting isotopes handled, the maximum quantities of materials handled, where the experience was gained, the duration of experience, and the type of use.
7. In your application, you described very few training program elements associated with regulatory requirements or licensee specific program elements such as emergency procedures, instrumentation, authorized users, ordering radioisotopes and others as described in Appendix J of NUREG-1556 for radiation workers and ancillary personnel (maintenance, security, etc.). The training given to each group should be commensurate with the duties and responsibilities of the group. The training program must assure that personnel are instructed before assuming duties with, or in the vicinity of, licensed materials and specify a frequency for periodic refresher training. Please describe your training program for radiation workers and ancillary personnel. Appendix J of NUREG-1556, Volume 7 addresses radiation safety training topics and may be helpful in developing your response.
8. Your application made use of Appendix C of NUREG-1556 Vol. 7. In two locations there is not a check mark in the "Yes" column and thus the commitments to the statements need to be written in the attached text. These locations are on page C-5, Radiation Monitoring Instruments and page C-6, Occupational Dose. Please make the statement addressed in those paragraphs.

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-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. 137292. If you have any technical questions regarding this deficiency letter, please call Dennis Lawyer at (610) 337-5366 or me at (610) 337-5040.

K. Ramachandra Bhat
Lincoln Univ. Of the Commonwealth System

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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

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

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SISP Review Complete: DRL 1

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