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CENTER FOR ENVIRONMENTAL HEALTH & OCCUPATIONAL SAFETY (EHS)
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27 July 2005

Document Control Desk, ATTN: Charles Cox
Director, Office of Nuclear Material Safety and Safeguards
United States Nuclear Regulatory Commission
Washington, D.C. 20555

RE: EA-05-006

Dear Mr. Cox,

This letter is in response to the 19 July 2005 Nuclear Regulatory Commission's Order, promulgating requirements for the Uniformed Services University of the Health Sciences (USUHS) to implement additional security measures in the transportation of radioactive material quantities of concern (RAMQC).

The USUHS currently possesses multi-curie amounts of Cobalt 60 and Cesium 137 exceeding the quantities listed in Table A: Radionuclides of Concern, Attachment B, of the NRC's Order. These activities are contained in the sealed sources of two self-shielded gamma irradiators under our NRC License No. 19-23344-02. Neither of our two USUHS NRC Licenses permits us to transport or ship Type B quantities of radioactive material (10 CFR Part 71). Additionally, the USUHS does not anticipate a need to transport any radioactive material that would exceed the quantities listed in Table A: Radionuclides of Concern.

In the event the USUHS offers radioactive material for shipment that equals or exceeds a quantity listed in Table A, we will verify that the contractor who transports RAMQC to or from our University meets all of the requirements set forth in Attachment B of the Order, prior to the shipment being performed. The requirements described in Attachment B of the Order will also be included into the signed contract with the contractor. Additionally, before the transfer of any radioactive material quantities of concern, we will verify that the intended recipient's license authorizes receipt of the regulated material by direct contact with the regulatory authority that issued the license prior to transferring the material.

If conditions change that would require the USUHS to ship RAMQC, we will inform the NRC ninety (90) days in advance of any such shipment.

If you need further information please contact me at 301-295-3390, dhamilton@usuhs.mil.

Daniel S. Hamilton, M.S.
Major, U. S. Army
Radiation Safety Officer

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