



Pennsylvania Department of Environmental Protection

Rachel Carson State Office Building

P.O. Box

Harrisburg, PA 17105-

August 19, 2005

Q-4

Licensing Assistant Section
Nuclear Materials Safety Branch
U.S. Nuclear Regulatory Commission Region 1
475 Allendale Road
King of Prussia, PA 19406-1415

07000781

X

Re: License Renewal SNM-719

Dear : Sir or Madam:

Attached is a request to renew License No. SNM-719. The renewal reflects changes to personnel, and the completed relocation of the Radiation Measurements Laboratory to 2575 and closeout survey of Evangelical Press Building site on 3rd & Reilly St. Harrisburg, PA.] 138353

Please contact me at: 717 346-8246 or by email at tolewis@state.pa.us for additional information.

Sincerely,

Tonda Lewis

Radiation Protection Program Supervisor

Environmental Surveillance Section – Decommissioning and Surveillance Division

bcc:

138353

NUCLEAR MATERIALS-002

REC'D IN LAT AUG 25 2005

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SEPARATED OUT OF 137575
2/8/2006.



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

October 13, 2005

Docket No. 07000781
Control No. 137575

License No. SNM-719

Tonda Lewis
Radiation Protection Program Supervisor
PA Department of Environmental Protection
PO Box 8469
Harrisburg, PA 17105-8469

SUBJECT: PA DEPARTMENT OF ENVIRONMENTAL PROTECTION, REQUEST FOR
ADDITIONAL INFORMATION CONCERNING APPLICATION FOR RENEWAL
OF LICENSE, CONTROL NO. 137575

Dear Ms. Lewis:

This is in reference to your application dated August 16, 2005 requesting to renew Nuclear Regulatory Commission License No. SNM-719. In order to continue our review, we need the following additional information:

1. In order to remove the facility located at Evangelical Press Building, 3rd and Reilly Streets from your license, you must submit the results of your Final Status Survey Report for review. Guidance for the Final Status Survey Report may be found in NUREG-1757, Volume 2, Section 4.5. 138353
2. Items 5.B., 5.C., and 5.D. of your application are source material and as such are subject to 10 CFR Part 40. You should review the regulation in 10 CFR 40.22 to determine if you meet the requirements of this general license. If so, you may remove the items from this license.
3. For item 5.A., list all manufacturers for all sealed sources possessed.
4. Describe the specific isotopes the individual has handled, the maximum quantities of materials handled, where the experience was gained, the duration of the experience and the type of use for the following proposed authorized users: James Kucynski, Rubeena Quazi, Jeffrey L. Whitehead, Christine Robbins, Michael P. Murphy, Roy Woods, John T. Maher, Bryan R. Werner and Gerald R. Dworsak.

Current NRC regulations and guidance are included on the NRC's website at www.nrc.gov; select **Nuclear Materials; Medical, industrial, and academic uses of nuclear material**; then **toolkit index page**. Or you may obtain these documents 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).

T. Lewis
PA Department of Environmental Protection

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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. 137575. 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

This Document is Sensitive and Should Be Non-Public.

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SISP Review Complete: (STH)

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OFFICE	DNMS/RI	N	DNMS/RI	N	DNMS/RI			
NAME	SHammann/STH		EUlrich/EXU					
DATE	10/13/2005		10/13/2005					

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Q-9
MS-16

Docket No. 07000781
Control No. 137575

License No. SNM-719

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RECEIVED

United States
Nuclear Regulatory Commission
Region 1
475 Allendale Road
King of Prussia, PA19406-1415

In reference to the request for additional information;

Item 1. -Attached are results of the final survey and maps with location/work key of the Evangelical Press Building. 138353

Item 2. -Upon review of 10 CFR 40.22, the quantities of Thorium 228, 229 and Uranium 232 are well within the limits of a general license and are removed from our renewal request documents.

Item 3. -The manufacturer of the sealed sources in 5A is Eberline Services.

Item 4. -Experience with type and quantity of material they propose to use:

Proposed authorized users for Item 5A through 5G

Rubeena Quazi and Christine Robbins:

Each proposed authorized user receives training from an authorized user/senior chemist to analyze environmental samples for Radiochemistry. Handling of the materials within the quantities listed on the application is closely supervised during their training in preparing standards for calibration of equipment and analysis of quality control samples. These proposed authorized users had to successfully complete Initial Demonstration Of Capabilities study and also analyze blind QC samples, provided by Bureau's Quality Assurance officer, before preparing and analyzing unknown samples, all under the supervision of the senior chemist/authorized user. New analysts (proposed authorized users) also must submit analytical data to either senior chemist or a section supervisor for a review and approval until completion of one year training.

Being a small section, analysts are cross-trained in more then one analytical methods. They have received extensive training and have experience to use all radioactive material we acquired under the NRC license in Radiation Measurement Section.

Since submission of the renewal request **James Kurcynski** has transferred out of the Department of Environmental Protection and should not be added to our license.

Proposed authorized users for Item 5G

Bryan R. Werner, Jeffrey L. Whitehead, Michael P. Murphy, Roy Woods, John T. Maher and Gerald R. Dworsak are staff members in the Bureau of Radiation Protection. As active participants in the Emergency Response team and as part of the ongoing training required, Bureau staff regularly attend training sponsored by the NRC. During these training sessions and their work experiences (see Item 7.2) they have obtained extensive experience using check sources such as the plutonium- 239 sources for instrument calibration.

I have attached copies of the original work submitted with corrections and a copy of your request for additional information. Please contact me for any additional information needed.

Thank you.

Sincerely,

A handwritten signature in black ink that reads "Tonda L. Lewis". The signature is written in a cursive style with a large initial 'T' and 'L'.

Tonda Lewis tolewis@state.pa.us
Radiation Protection Program Supervisor
Department of Environmental Protection
PO 8469 RCSOB
Bureau of Radiation Protection
Harrisburg, PA

Evan Press Final Status Data**7/14/05****Building vacated of all radiological standards and materials 7/11/05**Inventory taken 6/3/05: Packing and moving of materials: Ecology Services Management Consultants
under supervision of Taru Upadyhay and Tonda Lewis**Dry Wipes of Selected Work Areas**Radiation Measurements Laboratory
7/14/05 - Close out Survey

<u>Wipe</u>	<u>Work Areas</u>	<u>Alpha Results (uCi/wipe)</u>	<u>Beta Results (uCi/wipe)</u>	<u>Tritium Results (uCi/wipe)</u>
A	1, 2, 3, 6, 7, 8,	+/- 1.4 x 10 ⁻⁶	4.8 +/- 0.6 x10 ⁻⁶	-----
A-1	Hi-Spec Floor	< 0.7 x 10 ⁻⁶	1.5 +/-0.5 x 10 ⁻⁶	-----
B	9, 10, 11, 14, 16, 17, 18, 19	< 0.7 x 10 ⁻⁶	< 0.7 x 10 ⁻⁶	-----
C	4, 32, 33, 43, 50	8.6 +/- 1.4 x 10 ⁻⁶	3.0 +/- 0.5 x 10 ⁻⁶	< 130 x 10 ⁻⁶
D	28, 29, 30, 31	0.9 +/- 0.6 x 10 ⁻⁶	1.0 +/- 0.4 x 10 ⁻⁶	-----
E	21, 22, 24, 25, 27, 27a	0.7 +/- 0.5 x 10 ⁻⁶	< 0.6 x 10 ⁻⁶	-----
F	35, 36, 37, 38, 38a, 39, 40, 51	< 0.8 x 10 ⁻⁶	< 0.6 x 10 ⁻⁶	-----
G	41, 42, 44, 45, 48, 49	4.5 +/- 1.0 X 10 ⁻⁶	1.0 +/- 0.4 x 10 ⁻⁶	-----
G-1	Floor - Sample prep room	0.9 +/- 0.6 x 10 ⁻⁶	0.7 +/- 0.4 x 10 ⁻⁶	-----
B-1		< 0.7 x 10 ⁻⁶	0.5 +/- 0.4 x 10 ⁻⁶	

Evan Press Final Status Data**7/14/05****Building vacated of all radiological standards and materials 7/11/05**

Inventory taken 6/3/05: Packing and moving of materials: Ecology Services Management Consultants

under supervision of Taru Upadyhay and Tonda Lewis

Survey Instrument - Eberline 12389

Background: .020 - .040 mR/hr. Eberline SN 12389

Check Source - Tc-99

Probe HP 270 SN 014287

Background Reading -0.04 - 0.06 mR/hr.

Calibrated 3/11/05

<u>Survey Area *</u>		<u>Type of Radiation Surveyed</u>	<u>Window</u>	<u>Distance from Probe</u>	<u>Instrument Reading (mR/hr)</u>
1	- Hi-Spec Storage Cabinet	Beta/Gamma	Open	0.5 cm	0.04 - 0.06
2	-Hood #29	Beta/Gamma	Open	0.5 cm	0.04 - 0.06
5	-Hi-Spec Sink	Beta/Gamma	Open	0.5 cm	0.04 - 0.06
12	-Trough Sink	Beta/Gamma	Open	0.5 cm	0.04 - 0.06
13	-Center Sink	Beta/Gamma	Open	0.5 cm	0.04 - 0.06
15	-East Wall Sink	Beta/Gamma	Open	0.5 cm	0.04 - 0.06
20	-North Wall Sink	Beta/Gamma	Open	0.5 cm	0.04 - 0.06
23	-Hood #25 Sink	Beta/Gamma	Open	0.5 cm	0.04 - 0.06
26	-South Wall Sink	Beta/Gamma	Open	0.5 cm	0.04 - 0.06
34	-Hood #22 Sink	Beta/Gamma	Open	0.5 cm	0.04 - 0.06
46	-Sample Prep Room Sink	Beta/Gamma	Open	0.5 cm	0.04 - 0.06
47	-Sample Prep Room Sink	Beta/Gamma	Open	0.5 cm	0.04 - 0.06
48	-Beaker Cabinet	Beta/Gamma	Open	0.5 cm	0.04 - 0.06
49	-Gamma Standards Storage Cabinet	Beta/Gamma	Open	0.5 cm	0.04 - 0.06
52	- Solid Waste Can 1	Beta/Gamma	Open	0.5 cm	0.04 - 0.06
	- Solid Waste Can 2		Open	0.5 cm	0.04 - 0.06

- See attached sheet "Radiation Survey Areas"

Evan Press Final Status Data

7/12/05

Building vacated of all radiological standards and materials 7/11/05

Inventory taken 6/3/05: Packing and moving of materials: Ecology Services Management Consultants
under supervision of Taru Upadyhay and Tonda Lewis

Survey Instrument - Eberline 12389

Background: .020 - .040 mR/hr. Eberline SN 12389

Check Source - Tc-99

Probe HP 270 SN 014287

Background Reading -0.04 - 0.06 mR/hr.

Calibrated 3/11/05

Furniture Surveyed

Background: 0.020 - 0.060 mR/hr. Eberline SN 12389

Probe HP 270 SN 014287

Calibrated 3/11/05

	location/inventory #	mR/hr
Desk 1	Counting room	< 0.060
Desk 2	Counting room	< 0.060
Desk 3	Counting room	< 0.060
Desk 4	Counting room	< 0.060
Desk 5		< 0.060
Chair 1	148803-15	< 0.060
Chair 2	7419	< 0.060
Chair 3	148803-20	< 0.060
Chair 4	148803-22	< 0.060
Chair 5	no num. - gray	< 0.060
Chair 6	no num - Green	< 0.060
Chair 7	148803-17	< 0.060

Locations

RADIATION SURVEY AREAS

1. EPA Cross-Check and interim storage cabinet - West wall - Hi Spec lab.
2. Liquid standards and check source storage cabinet - under Hood #29 - West wall - Hi Spec lab.
3. Hood #55 - West wall - Hi Spec lab.
4. Bench top - Southwest corner - Hi Spec lab.
5. Sink - South wall - Hi Spec lab.
6. Bench top - Southeast corner - Hi Spec lab.
7. Hood #54 - East wall - Hi Spec lab.
8. Standards and spiked samples drying oven - East wall - Hi Spec lab.
9. Hood #58 - South wall - Low Spec lab.
10. Bench top - South and East walls - Low Spec lab.
11. Bench top - Center - Low Spec lab.
12. Trough sink - Center - Low Spec lab.
13. Sink - Center - Low Spec lab.
14. Bench top - Center - Low Spec lab.
15. Sink - East wall - Low Spec lab.
16. Super critical fluid extractor
17. Muffle furnace - North wall - Low Spec lab.
18. Hood #62 - North wall - Low Spec lab.
19. Hood #61 - North wall - Low Spec lab.
20. Sink - North wall - Low Spec lab.
21. Lab bench - North and West walls - Low Spec lab.
22. Hoods #59, #60, - Center - Low Spec lab.
- 22.a Oven.
23. Sink - Hood #59 - Low Spec lab.
24. Hoods #56, #57 - Center - Low Spec lab.

Locations

RADIATION SURVEY AREAS

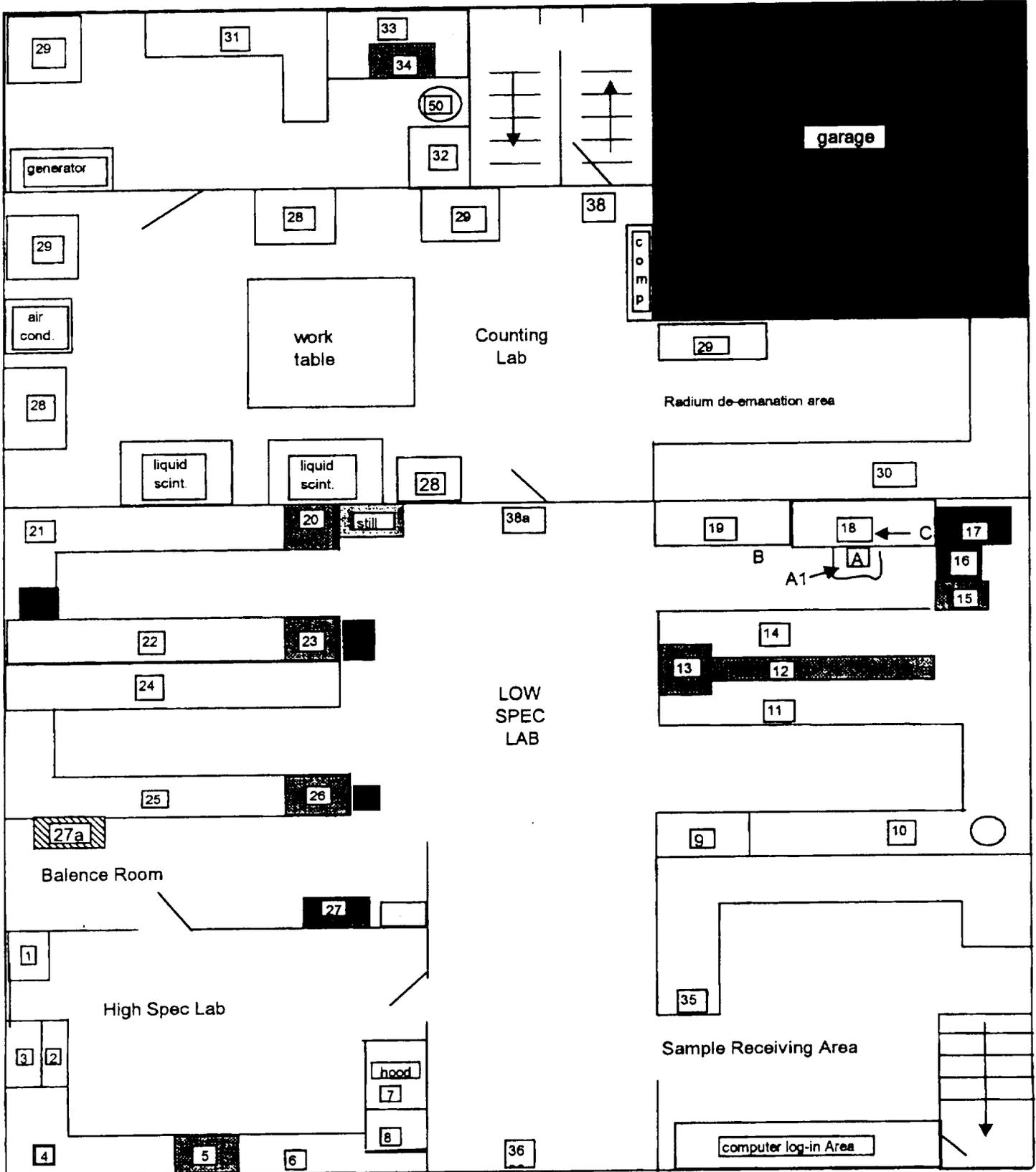
25. Lab bench - South and West walls - Low Spec lab.
26. Sink - South wall - Low Spec lab.
27. Table - South wall - Balance room. Centrifuge and scale.
- 27a. Dessicator - North and West walls - Counting lab.
28. Tannelac alpha/beta counting system - South wall - Counting lab.
29. Gamma Products FPC instruments - North and West walls - Counting lab.
30. Lab bench - South and East walls - Radium D_e-emanation area - Counting lab.
31. Lab bench - Center - Tritium Prep room.
32. Lab bench - East wall - Tritium Prep room.
33. Hood #64 - Tritium Prep. room.
34. Sink - Hood #22 - Tritium Prep room.
35. Lab bench - Center aisle and North wall - Sample Receiving room.
36. Doorknob - South laboratory entrance.
37. Door push - Entrance - Laboratory stairs to basement.
38. Door push - North laboratory exit.
- 38a. Doorknob - Counting lab.
39. Door push (exterior) - East entrance - Annex basement - Gamma Spec room.
40. Door handle (interior) - East entrance - Annex basement - Gamma Spec room.
41. Doorknob (exterior) - Entrance - Annex basement - Sample Prep room.
42. Doorknob (interior) - Entrance - Annex basement - Sample Prep room.
43. Lab bench - East wall - Annex basement - Sample Prep room.
44. Lab bench - South wall - Annex basement - Sample Prep room.
45. Lab bench - Southwest wall - Annex basement - Sample Prep room.

Locations

RADIATION SURVEY AREAS

46. Sink - West wall - Annex basement - Sample Prep room.
47. Sink - West wall - Annex basement - Sample Prep room.
48. Beaker storage and filter standards cabinet - North wall - Annex basement Sample Prep room.
49. Gamma Standards storage cabinet - Southwest corner - Annex basement - Sample Prep room.
50. Tritium Waste storage cans - Tritium Prep. Room
51. Door push - Northeast exit - Annex basement - Gamma Spec room.
52. Solid Waste can - Closet - Annex basement - Lab shop.
53. Ni-63 Source storage Cabinet - Annex basement - Sample Prep room.

1stfloor1



ANNEX
BASEMENT

