



Milton S. Hershey Medical Center
College of Medicine

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 REGION 1

Division of Health Physics

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2006 FEB 13 PM 2:33

February 6, 2006

U.S. Nuclear Regulatory Commission
 Region I
 475 Allendale Road
 King of Prussia, Pennsylvania 19406-1415

Attn: Thomas K. Thompson

Re: :License Renewal, Control No. 137392

Dear Mr. Thompson;

03003203

Thank you for your letter of January 12, 2006, notifying us of renewal of License 37-13831-01 with a new expiration date of July 31, 2006. This letter is to request clarification of certain requirements that your letter states that we must meet in our next renewal application. Specifically, I have to question those conditions that you outline on page 2 and 3 of your letter. As a Type A, broad scope licensee, we have, in the past, not had to comply with all the notification and amendment requests that you outline. It is our interpretation of 10 CFR 35.15, that we are exempt from many of the reporting and amendment requirements that you describe.

Could you please clarify the NRC's position on this before we proceed further with the renewal process? For example, an institution with hundreds of Authorized Users would need to be in perpetual contact with you if notification is required every time an Authorized User terminates or a new Authorized User is approved.

Your clarification of the stated requirements would be appreciated.

Sincerely,

Kenneth L. Miller, RSO

cc: L.K. Thompson, Administrator

NMOS/RGNI MATERIALS-002