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UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
REGION IV  
611 RYAN PLAZA DRIVE, SUITE 400  
ARLINGTON, TEXAS 76011-8064

November 22, 1999

University of Montana  
ATTN: Dan Corti  
Radiation Safety Officer  
Missoula, Montana 59812-1387

**SUBJECT: LICENSE AMENDMENT**

Please find enclosed Amendment No. 31 to License No. 25-01706-03. You should review this license carefully and be sure that you understand all conditions. If you have any questions, you may contact me at (817) 860-8143.

NRC expects licensees to conduct their programs with meticulous attention to detail and a high standard of compliance. Because of the serious consequences to employees and the public that can result from failure to comply with NRC requirements, you must conduct your radiation safety program according to the conditions of your NRC license, representations made in your license application, and NRC regulations. In particular, note that you must:

1. Operate by NRC regulations 10 CFR Part 19, "Notices, Instructions and Reports to Workers: Inspection and Investigations," 10 CFR Part 20, "Standards for Protection Against Radiation," and other applicable regulations.
2. Notify NRC in writing of any change in mailing address.
3. By 10 CFR 30.36(b) and/or license condition, notify NRC, promptly, in writing, and request termination of the license:
  - a. When you decide to terminate all activities involving materials authorized under the license; or
  - b. If you decide not to complete the facility, acquire equipment, or possess and use authorized material.
4. Request and obtain a license amendment before you:
  - a. Change Radiation Safety Officers;
  - b. Order byproduct material more than the amount or form authorized on the license;
  - c. Add or change the areas or address(es) of use identified in the license application or on the license; or
  - d. Change the name or ownership of your organization.
5. Submit a complete renewal application or termination request at least 30 days before the expiration date on your license. You will receive a reminder notice approximately 90 days before the expiration date. Possession of radioactive material after your license expires is a violation of NRC regulations.

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Non-Public Activity - 1286  
ML 99 3500033 21816

University of Montana

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In addition, please note that NRC Form 313 requires the applicant, by signature, to verify that the applicant understands that all statements contained in the application are true and correct to the best of the applicant's knowledge. The signatory for the application should be the licensee or certifying official rather than a consultant.

NRC will periodically inspect your radiation safety program. Failure to conduct your program according to NRC regulations, license conditions, and representations made in your license application and supplemental correspondence with NRC may result in enforcement action against you. This could include issuance of a notice of violation; imposition of a civil penalty; or an order suspending, modifying, or revoking your license as specified in the "General Statement of Policy and Procedure for NRC Enforcement Actions" (Enforcement Policy), NUREG 1600.

Thank you for your cooperation.

Sincerely,

**ORIGINAL SIGNED BY VIVIAN H. CAMPBELL**

Vivian H. Campbell  
Senior Radiation Specialist  
Nuclear Materials Licensing Branch

Docket: 030-00872  
License: 25-01706-03  
Control: 467548

Enclosures: As stated

DOCUMENT NAME: P:\

To receive copy of document, indicate in box: "C" = Copy without enclosures "E" = Copy with enclosures "N" = No copy

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VHCampbell <i>JH</i>							
<i>12/199</i>							

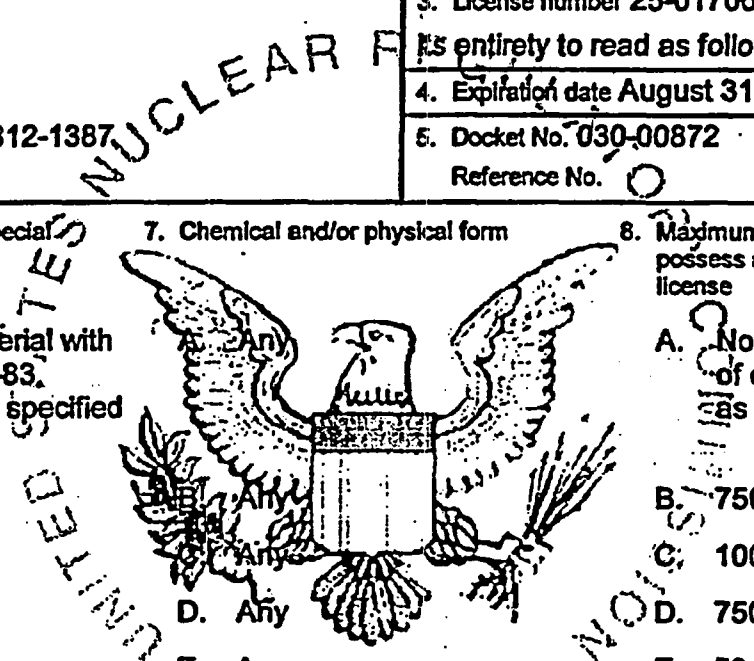
OFFICIAL RECORD COPY

**MATERIALS LICENSE**

Pursuant to the Atomic Energy Act of 1954, as amended, the Energy Reorganization Act of 1974 (Public Law 93-438), and Title 10, Code of Federal Regulations, Chapter I, Parts 30, 31, 32, 33, 34, 35, 36, 39, 40, and 70, and in reliance on statements and representations heretofore made by the licensee, a license is hereby issued authorizing the licensee to receive, acquire, possess, and transfer byproduct, source, and special nuclear material designated below; to use such material for the purpose(s) and at the place(s) designated below; to deliver or transfer such material to persons authorized to receive it in accordance with the regulations of the applicable Part(s). This license shall be deemed to contain the conditions specified in Section 183 of the Atomic Energy Act of 1954, as amended, and is subject to all applicable rules, regulations, and orders of the Nuclear Regulatory Commission now or hereafter in effect and to any conditions specified below.

<p style="text-align: center;">Licensee</p> <p>1. University of Montana</p> <p>2. Building 32 Missoula, Montana 59812-1387</p>	<p>In accordance with letter dated October 3, 1999</p> <p>3. License number 25-01706-03 is amended in its entirety to read as follows:</p> <p>4. Expiration date August 31, 2005</p> <p>5. Docket No. 030-00872 Reference No. <input type="radio"/></p>
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<p>6. Byproduct, source, and/or special nuclear material:</p> <p>A. Any byproduct material with Atomic Numbers 1-83, inclusive except as specified below</p> <p>B. Hydrogen-3</p> <p>C. Carbon-14</p> <p>D. Phosphorus-32</p> <p>E. Sulfur-35</p> <p>F. Chromium-51</p> <p>G. Zinc-65</p> <p>H. Iodine-125</p> <p>I. Nickel-63</p> <p>J. Nickel-63</p>	<p>7. Chemical and/or physical form</p> <p>A. Any</p> <p>B. Any</p> <p>C. Any</p> <p>D. Any</p> <p>E. Any</p> <p>F. Any</p> <p>G. Any</p> <p>H. Any</p> <p>I. Plated sources in Perkin-Elmer Corp. Model 330-0119 detector cells</p> <p>J. Plated sources in Perkin-Elmer Corp. model 009-0282 detector cells</p>	<p>8. Maximum amount that licensee may possess at any one time under this license</p> <p>A. Not to exceed 10 millicuries of each radionuclide except as specified below</p> <p>B. 750 millicuries</p> <p>C. 100 millicuries</p> <p>D. 750 millicuries</p> <p>E. 50 millicuries</p> <p>F. 20 millicuries</p> <p>G. 20 millicuries</p> <p>H. 50 millicuries</p> <p>I. Not to exceed 15 millicuries per source</p> <p>J. Not to exceed 15 millicuries per foil</p>
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**MATERIALS LICENSE  
SUPPLEMENTARY SHEET**

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Docket or Reference Number  
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6. Byproduct, source, and/or special nuclear material

K. Americium-241

7. Chemical and/or physical form

K. Sealed sources registered either with NRC under 10 CFR 32.210 or with an Agreement State and incorporated in a compatible gauging device as specified in Item 9 of this license

8. Maximum amount that licensee may possess at any one time under this license

K. No single source to exceed 50 millicuries

L. Cesium-137

L. Sealed sources registered either with NRC under 10 CFR 32.210 or with an Agreement State and incorporated in a compatible portable gauging device as specified in Item 9 of this license

L. No single source to exceed 11 millicuries

9. Authorized use:

A. through H. Research and development as defined in Section 30.4 of 10 CFR Part 30, including animal studies; student instruction and demonstration.

I. and J. For use in gas chromatographs for sample analysis.

K and L. To be used, for measurement purposes, in portable Troxler Electronic Laboratories, Inc. or Campbell Pacific Nuclear/Boart Longyear Company gauging devices that have been registered either with NRC under 10 CFR 32.210 or with an Agreement State and have been distributed in accordance with an NRC or Agreement State specific license authorizing distribution to persons specifically authorized by an NRC or Agreement State license to receive, possess, and use the devices.

**CONDITIONS**

10. A. Licensed material identified in Items 6.A. through 6.J. above shall be used only at the licensee's facilities located at:

(1) University of Montana campus, Missoula, Montana (2) Biological Station on Flathead Lake at Yellow Bay between Bigfork and Polson, Montana, and (3) the Lubrecht Experimental Forest, Greenough, Montana.

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- B. Licensed material identified in Item 6.K. and 6.L. above may be used at temporary job sites anywhere in the United States where the U.S. Nuclear Regulatory Commission maintains jurisdiction for regulating licensed material, including areas of exclusive Federal jurisdiction within Agreement States.

If the jurisdiction status of a Federal facility within an Agreement State is unknown, the licensee should contact the federal agency controlling the job site in question to determine whether the proposed job site is an area of exclusive Federal jurisdiction. Authorization for use of radioactive materials at job sites in Agreement States not under exclusive Federal jurisdiction shall be obtained from the appropriate state regulatory agency.

11. A. Licensed material shall be used by, or under the supervision of, individuals designated by the University Radiation Hazards Committee, George Card, Ph.D. Chairman.
- B. The Radiation Safety Officer for this license is Dan Corn.
12. A. Sealed sources and detector cells shall be tested for leakage and/or contamination at intervals not to exceed 6 months or at such other intervals as specified by the certificate of registration referred to in 10 CFR 32.210.
- B. Notwithstanding Paragraph A of this Condition, sealed sources designed to emit alpha particles shall be tested for leakage and/or contamination at intervals not to exceed 3 months.
- C. In the absence of a certificate from a transferor indicating that a leak test has been made within 6 months prior to the transfer, a sealed source or detector cell received from another person shall not be put into use until tested.
- D. Sealed sources need not be leak tested if:
- (i) they contain only hydrogen-3; or
  - (ii) they contain only a radioactive gas; or
  - (iii) the half-life of the isotope is 30 days or less; or
  - (iv) they contain not more than 100 microcuries of beta and/or gamma emitting material or not more than 10 microcuries of alpha emitting material; or
  - (v) they are not designed to emit alpha particles, are in storage, and are not being used. However, when they are removed from storage for use or transferred to another person, and have not been tested within the required leak test interval, they shall be tested before use or transfer. No sealed source or detector cell shall be stored for a period of more than 10 years without being tested for leakage and/or contamination.

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- E. The leak test shall be capable of detecting the presence of 0.005 microcurie of radioactive material on the test sample. If the test reveals the presence of 0.005 microcurie or more of removable contamination, a report shall be filed with the U.S. Nuclear Regulatory Commission in accordance with 10 CFR 30(b)(2), and the source shall be removed immediately from service and decontaminated, repaired, or disposed of in accordance with Commission regulations. The report shall be filed within 5 days of the date the leak test result is known with the U.S. Nuclear Regulatory Commission, Region IV, 611 Ryan Plaza Drive, Suite 400, Arlington, Texas 76011, ATTN: Director, Division of Nuclear Materials Safety. The report shall specify the source involved, the test results, and corrective action taken.
- F. Tests for leakage and/or contamination shall be performed by the licensee or by other persons specifically licensed by the Commission or an Agreement State to perform such services.
13. Maintenance, repair, cleaning, replacement, and disposal of foils contained in detector cells shall be performed only by the device manufacturer or other persons specifically authorized by the Commission or an Agreement State to perform such services.
14. A. Detector cells containing a titanium tritide foil or a scandium tritide foil shall only be used in conjunction with a properly operating temperature control mechanism which prevents the foil temperature from exceeding that specified by the manufacturer and approved by U.S. Nuclear Regulatory Commission.
- B. When in use, detector cells containing a titanium tritide foil or a scandium tritide foil shall be vented to the outside.
15. Each portable nuclear gauge shall have a lock or outer locked container designed to prevent unauthorized or accidental removal of the sealed source from its shielded position. The gauge or its container must be locked when in transport, storage, or when not under the direct surveillance of an authorized user.
16. Except for maintaining labeling as required by 10 CFR Part 20 or 71, the licensee shall obtain authorization from NRC before making any changes in the sealed source, device, or source-device combination that would alter the description or specifications as indicated in the respective Certificates of Registration issued either by the Commission pursuant to 10 CFR 32.210 or by an Agreement State.
17. Any cleaning, maintenance, or repair of the gauge(s) that requires removal of the source rod shall be performed only by the manufacturer or by other persons specifically licensed by the Commission or an Agreement State to perform such services.
18. A. If the licensee uses sealed sources or probes containing sealed sources at depths greater than 3 feet, the licensee shall use surface casing that extends from the lowest depth to 12 inches above the surface and other appropriate procedures to reduce the probability of the source or probe becoming lodged below the surface.

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- B. If a sealed source or a probe containing sealed sources becomes lodged below the surface and it becomes apparent that efforts to recover the sealed source or probe may not be successful, the licensee shall notify the U.S. Nuclear Regulatory Commission and submit the report required by 10 CFR 30.50 (b)(2) and (c). The licensee shall not abandon the sealed source or probe without obtaining the Commission's prior written consent.
19. Sealed sources or detector cells containing licensed material shall not be opened or sources removed from source holders by the licensee.
20. The licensee is authorized to hold radioactive material with a physical half-life of less than 65 days for decay-in-storage before disposal in ordinary trash provided:
- A. Radioactive waste to be disposed of in this manner shall be held for decay a minimum of 10 half-lives.
- B. Before disposal as ordinary trash, byproduct material shall be surveyed at the container surface with the appropriate meter set on its most sensitive scale and with no interposed shielding to determine that its radioactivity cannot be distinguished from background. All radiation labels shall be removed or obliterated.
- C. A record of each disposal permitted under this License Condition shall be retained for three years. The record must include the date of disposal, the date on which the byproduct material was placed in storage, the radionuclides disposed, the survey instrument used, the background dose rate, the dose rate measured at the surface of each waste container, and the name of the individual who performed the disposal.
21. The licensee is authorized to transport licensed material only in accordance with the provisions of 10 CFR Part 71, "Packaging and Transportation of Radioactive Material."
22. In addition to the possession limits in Item 8, the licensee shall further restrict the possession of unsealed licensed material to quantities less than  $10^4$  times the applicable limits in Appendix B of 10 CFR Part 30 as specified in 10 CFR 30.35(d).
23. In addition to the possession limits in Item 8, the licensee shall further restrict the possession of sealed licensed material to quantities less than  $10^{10}$  times the applicable limits in Appendix B of 10 CFR Part 30 as specified in 10 CFR 30.35(d).
24. In addition to the possession limits in Item 8, the licensee shall further restrict the possession of licensed material to quantities below the limits specified in 10 CFR 30.72 which require consideration of the need for an emergency plan for responding to a release of licensed material.
25. The licensee shall conduct a physical inventory every 6 months to account for all sources and/or devices received and possessed under the license.



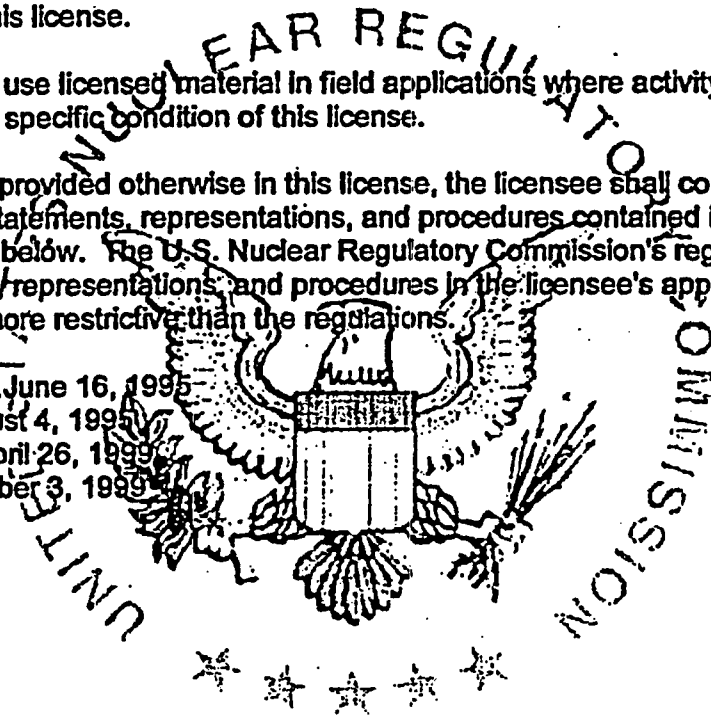
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26. Experimental animals, or the products from experimental animals, that have been administered licensed materials shall not be used for human consumption.
27. This license does not authorize commercial distribution of licensed material.
28. The licensee shall not use licensed material in or on human beings except as provided otherwise by specific condition of this license.
29. The licensee shall not use licensed material in field applications where activity is released except as provided otherwise by specific condition of this license.
30. Except as specifically provided otherwise in this license, the licensee shall conduct its program in accordance with the statements, representations, and procedures contained in the documents, including any enclosures, listed below. The U.S. Nuclear Regulatory Commission's regulations shall govern unless the statements, representations, and procedures in the licensee's application and correspondence are more restrictive than the regulations.
- A. Application dated June 16, 1995  
 B. Letter dated August 4, 1995  
 C. Letter received April 26, 1999  
 D. Letter dated October 3, 1999



FOR THE U.S. NUCLEAR REGULATORY COMMISSION

ORIGINAL SIGNED BY VIVIAN H. CAMPBELL

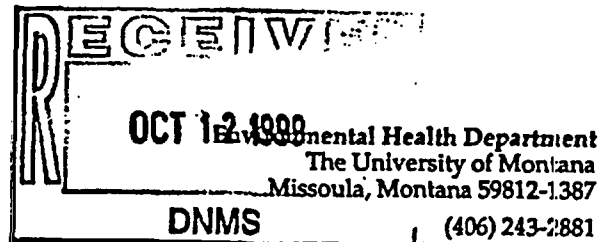
NOV 22 1999

Date \_\_\_\_\_

By \_\_\_\_\_  
 Vivian H. Campbell, Senior Radiation Specialist  
 Nuclear Materials Licensing Branch  
 Region IV  
 Arlington, Texas 76011



The University of  
**Montana**



Environmental Health Department  
The University of Montana  
Missoula, Montana 59812-1387

DNMS (406) 243-2881  
FAX: (406) 243-2335

E-mail: [dcorti@selway.umt.edu](mailto:dcorti@selway.umt.edu)

Date: October 3, 1999

Nuclear Regulatory Commission  
611 Ryan Plaza Drive  
Suite 400  
Arlington, TX 76011-8604

Attention: Licensing Section

I am writing to notify the NRC of changes in our program and to request deletion of a sealed source from our license No. 25-01706-03, Docket No. 030-00872.

We have shipped our Troxler neutron gauge, model 3222, serial number 336, back to Troxler for disposal. Please see attached acknowledgment of receipt. I am not sure if this requires a license amendment given the wording in amendment 30 but if you feel that it does, please revise section 9 K. and L.

We have changed several of our procedures outlined in our license application dated June 16, 1995 as follows:

1. Control of Procurement and Use, Page 22, C is now done by the authorized user either faxing or emailing a completed copy of Radioactive Materials Order directly to Environmental Health where the RSO or RSOS calls the order in to the vendor. All fiscal accounting is now done within Environmental Health as well. We no longer use the old purchase order system that involved the Purchasing Department in Business Services. This change has given us much better control over purchasing and accounting for radioisotopes.
2. The Waste Management Section, page 43, first paragraph states that we do not intentionally release radioactive materials to the sanitary sewer. During our recent NRC inspection, we discussed this policy at length and have decided to change this policy. Please see the attached draft letter to the Missoula Wastewater Treatment Plant for details. We will not implement this policy change until you have had the opportunity to review and if necessary, comment on the policy.
3. Radiation Safety Committee Section 7.2 B., Membership page 8, states that we will have representatives from specific departments/divisions and at least 3 faculty members at all times. We would like to modify this by deleting the specific departmental references and keeping the requirement that all departments or groups currently using licensed radioactive materials shall be represented by a member of that department or group on the Radiation Safety Committee while still requiring at least 3 faculty members.

Thank you for your consideration of this request,

Sincerely,

  
Dan Corti  
Radiation Safety Officer

**FEE EXEMPT**



20 August 1999

UNIVERSITY OF MONTANA  
CONTROLLERS OFFICE  
820201 2293 3120  
Missoula, MT 59812

RECEIVED  
AUG 26 1999  
BUSINESS SERVICES

Please process payment in Banner.  
Please advise vendor that invoices should  
be addressed to your department address.

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Mr. Dan Corti,

This is to acknowledge receipt of the below-referenced nuclear gauge under North Carolina Radioactive Materials License #032-0182-1. You should retain this letter in your files to document transfer of the gauge.

Model: 3222

S/N: 336

Received: 3 August 1999

Any questions may be directed to me at extension 178.

Sincerely,

Robert S. Williams  
Service Department Supervisor

TROXLER ELECTRONIC LABORATORIES, INC.  
P.O. Box 12057. Research Triangle Park, NC 27709  
Telephone: 919-549-8661 Fax: 919-549-0761

**DRAFT**

Gene Connel, Industrial Pre-Treatment Coordinator  
Missoula Waste Water Treatment Plant  
201 West Spruce  
Missoula, MT 59801

\_\_\_\_\_ 1999

Dear Gene:

I am writing to follow up on our conversation about The University of Montana-Missoula changing its disposal practices for radioisotopes. I will provide the pertinent regulations and specify how we will demonstrate compliance with the regulations as well as describe the relative risk involved.

The Nuclear Regulatory Commission (NRC) regulates the use and disposal of all the radioisotopes used in research at The University of Montana-Missoula under the Code of Federal Regulations (CFR) Title 10, Chapter 1 Part 20 which reads in part:

*Subpart K--Waste Disposal*

*20.2001 General requirements*

*(a) A licensee shall dispose of licensed material only--*

- (1) by transfer to an authorized recipient as provided in 20.2006 or in the regulations in parts 30, 40, 60, 61, 70, or 72 of this chapter; or*
- (2) By decay in storage; or*
- (3) By release in effluents within the limits in 20.1301; or*
- (4) As authorized under 20.2002, 20.2003, 20.2004 or 20.2005*

The University of Montana-Missoula is electing to use the procedures provided under 20.2003

*20.2003 Disposal by release into sanitary sewerage.*

*(a) A licensee may discharge licensed material into sanitary sewerage if each of the following conditions is satisfied:*

- (1) The material is readily soluble (or is readily dispersible biological material) in water; and*
- (2) The quantity of licensed or other radioactive material that the licensee shall release into the sewer in 1 month divided by the average monthly volume of water released into the sewer by the licensee does not exceed the concentration listed in table 3 of appendix B to 20.1001-20.2401 (Appendix B); and*
- (3) If more than one radionuclide is released, the following conditions are also satisfied:*

*(i) The licensee shall determine the fraction of the limit in table 3 of Appendix B represented by discharges into sanitary sewerage by dividing the actual monthly concentration of each radionuclide released by the licensee into the sewer by the concentration of the radionuclide listed in table 3 of Appendix B; and*

*(ii) The sum of the fractions for each radionuclide required by paragraph (a)(3)(i) of this section does not exceed unity; and*

*(4) The total quantity of licensed material and other radioactive material that the licensee releases into the sanitary sewerage does not exceed 5 curies of hydrogen-3 (H-3), 1 curie of carbon 14 (C-14) and 1 curie of all other radioactive materials combined.*

*(b) Excreta from individuals undergoing medical diagnosis or therapy with radioactive material are not subject to the limitations contained in paragraph (a) of this section.*

All of the material we will be discharging is readily soluble or readily dispersible biological material as required in 20.2003 (a) (1). Compliance with 20.2003 (a) (2) is demonstrated as follows:

At this time we will only release H-3, C-14 and Sulfur-35 (S-35) to the sewer system. The Appendix B, Table 3 *Releases to Sewers: Monthly Average Concentration in microcuries/ml* is 0.01 for H-3; 0.0003 for C-14; and 0.001 for S-35. In the past 24 months we have generated a total of 30,186 microcuries of H-3 or 1257 microcuries/month; 16,949 microcuries of C-14 or 706 microcuries/month; and 8,000 microcuries of S-35 or 333 microcuries/month. Assuming a total flow through the Missoula Wastewater Treatment Plant of 270,000,000 gallons/month or 1,002,206,100,000 ml/month, the monthly average concentration of H-3 would be 0.000000001 microcuries/ml; the monthly average concentration of C-14 would be 0.0000000006 microcuries/ml and the monthly average concentration of S-35 would be 0.0000000003 microcuries/ml. The regulations pertain to the discharge of the licensee so that for regulatory purposes the average concentration in our discharge is what really matters.

Our average monthly discharge concentration based on the average annual flow from your billing records is as follows:

The annual discharge for 1996 and 1997 were 76.6 and 79.93 million gallons respectively, giving a monthly average discharge of 6.52 million gallons or 24,680,880,000 ml/month. The monthly average concentration going into the main equaled: 0.0000005 microcuries/ml of H-3; 0.000007 microcuries/ml of C-14 and 0.000003 microcuries/ml of S-35. These average concentrations are 43 to 20,000 times less than concentrations allowed by the Nuclear Regulatory Commission.

The sum of fractions for multiple radionuclides may not exceed unity as required by 20.2003 (a)(3). Our fractional equivalent for H-3 is 0.00005. For C-14 it is 0.023 and for S35 it is 0.003. This gives a total of 0.02605 or 0.03 in significant terms or 3 percent of unity.

20.2003 (4) requires that our total radioisotope discharge not exceed maximum levels for specified radioisotopes. As shown above, we are multiple orders of magnitude below these specific limits.

It is important to understand the relative risk to the general public and wastewater treatment plant workers associated with this type of discharge to public sewer. Let me summarize by saying that

the risk is immeasurably small. To illustrate this point, it is helpful to look at what the NRC considers allowable for worker exposure over the course of a year.

The NRC allows a worker to receive up to 5 rems or 5,000 millirems of ionizing radiation exposure each year. The employer is required to keep the dose As Low As Reasonably Achievable (ALARA) using all reasonable means. The NRC has concluded that a dose of 5 rems/year does not pose an unreasonable risk to workers. A rem is defined as *the special unit of any quantities expressed as dose equivalent. The dose equivalent in rems is equal to the absorbed dose in rads multiplied by the quality factor. A rad is the special unit of absorbed dose. One rad is equal to an absorbed dose of 100 ergs/gram or 0.01 joule/kilogram.* For those of us who are energy unit challenged, a rem of the beta emitters we are talking about is equivalent to about the same amount of energy it takes to light a 4 watt night lite bulb for one second.

To help predict the potential for exposure that would exceed the allowable occupational dose, the NRC has defined the allowable limit on intake (ALI) as *the derived limit for the amount of radioactive material taken into the body of an adult worker by inhalation or ingestion in a year. ALI is the smaller value of intake of a given radionuclide in a year by the reference man that would result in a committed effective dose equivalent of 5 rem or a committed effective dose equivalent of 50 rems to any individual organ or tissue. (ALI values for intake by ingestion and by inhalation of selected radionuclides are given in Table 1, Columns 1 and 2 of appendix B to 20.1001-20.2401.*

Appendix B lists the ALI for H-3 as 80,000 microcuries for both ingestion and inhalation compared to our average annual generation of 15,000 microcuries. For C-14, the ALI is 2,000 microcuries compared to our annual generation of 8,500 microcuries. The ALI for S-35 is 10,000 microcuries for ingestion and 2,000 microcuries for inhalation compared to our annual generation of 4,000 microcuries. Since our 6.5 million gallons of wastewater is further diluted in the 270 million gallons that pass through the treatment plant annually, it seems reasonable to assume that the concentration and potential exposure to workers is truly below the level of any concern.

It is interesting to note that the unavoidable exposure from cosmic and terrestrial ionizing radiation in our area is about 200 millirem/year. Medical evaluations in the form of dental x-rays, mammographies etc. add another 75-100 millirem per year per person. The highest exposure recorded in continual monitoring of individuals who have worked with radioisotopes for 20 plus years at The University of Montana-Missoula now stands at 120 millirems cumulative exposure.

I hope this has addressed any concerns you may have about our change in policy. If you have questions remaining, please feel free to contact me at 243-2881 and I will be happy to try and answer them.

BETWEEN:  
License Fee Management Branch, ARM  
and  
Regional Licensing Sections

Program Code: 01100  
Status Code: 0  
Fee Category: EX 3L  
Exp. Date: 20050831  
Fee Comments: 170.11(A)(4)  
Decom Fin Assur Req'd: Y

LICENSE FEE TRANSMITTAL

A. REGION

1. APPLICATION ATTACHED  
Applicant/License: MONTANA, UNIVERSITY OF  
Received Date: 19991012  
Docket No.: 3000872  
Control No.: 487548  
License No.: 25-01706-03  
Action Type: Amendment

2. FEE ATTACHED

Amount: \_\_\_\_\_  
Check No.: \_\_\_\_\_

3. COMMENTS

Signed Colleen Murchison  
Date 10/11/99

OCT 20 1999

B. LICENSE FEE MANAGEMENT BRANCH (Check when milestone 03 is entered )

1. Fee Category and Amount: EX 3L

2. Correct Fee Paid.  Application may be processed for:  
Amendment \_\_\_\_\_  
Renewal \_\_\_\_\_  
License \_\_\_\_\_

3. OTHER

Signed SC  
Date 10/15/99

Log	OCT 3 11
Remitter	
Check No.	
Amount	
Fee Category	EX 3L
Type of Fee	AM
Date Check Rec'd	10/15/99
Date Completed	
By	SC

170.11(A)(4)  
**FEE EXEMPT**