



Office of Environmental Health and Safety
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P-7*

*45-09599-03
0306045*

Facsimile Transmission Form

To: Thomas Thompson	From: Derek Krepp, RSO
Fax: 610-337-5269	Pages: 2
Phone:	Date: 5/12/2006
Re: Request for additional information	CC:

Urgent **For Review** **Please Comment** **Please Reply**

• Comments:

Dear Mr. Thompson:

This fax is in response to your email, dated April 17, 2006, Mail Control No 137851, requesting additional information regarding the application to renew license number 45-09599-03. If you need any additional information, or require further clarification, please contact me.

137851
NMSS/RGN MATERIALS-002

License No. 45-09599-03

- Old Dominion University would like to request an exemption from the record keeping and posting requirements, specifically, the requirement to identify a source by manufacturer and model number. The exemption is requested for a custom made Eu-155 sealed source, which lacks a model number. The source consists of SmPd₃ powder encapsulated in an aluminum disk. The University of Missouri in their reactor made the source on October 18, 1982. It was shipped to Old Dominion University on November 2, 1982. It is used to study the mossbauer effect.
- The following measures will be used to ensure the safety of Old Dominion University personnel and members of the general public:
 - The source will only be stored or used in approved radioactive work areas that are labeled with "Caution Radioactive Material". The container the source is stored in will also be labeled with "Caution Radioactive Material".
 - Only trained personnel may use the source.
 - Area surveys will be performed to ensure exposure rates in unrestricted areas are below the limits specified in Subpart D, 10 CFR 20.1301(a)(1) and (2), "Radiation Dose Limits for Individual Members of the Public".
 - To ensure compliance with Subpart C, 10 CFR 20.1201, "Occupational dose limits for adults" radiation exposures will be monitored through the use of TLD dosimeters.
 - Leak tests will be performed in accordance with NUREG-1556, Vol. 17, 9.10.7, specifically, the conditions specified in section 10.6.a of our license renewal application.
 - Accountability will be accomplished through a semi-annual inventory.
 - The source will be secured from unauthorized removal when unattended.
- In an effort to satisfy the sealed source identification requirement, all the documentation that accompanied the source was carefully reviewed. Once it was determined that no model number was present, the reactor facility who made the source was contacted. The facility indicated that custom sources were not assigned a model numbers. As a result, the university seeks an exemption to the sealed source registry requirement, specifically, the source's model number. In conclusion, we hope that you will find that the safety measures described above are sufficient and provide a level of protection that is equivalent to Subpart D, 10 CFR 32.210(c).