

**Official Use Only--Sensitive, Security-Related Information**  
**C.6 Checklist--DOCKET FILE INFORMATION**

Licensee: Lockheed Martin Commercial Mail Control No. 138971  
 Action Type: " New Amend " Renewal Program Code(s): 03620  
 License No: 37-02006-09 Docket No. 03012894

**STEP 1--Radioactive Materials and Quantities Requested:**

|   |  |           |
|---|--|-----------|
| <b>Instructions for Step 1:</b> Complete Step 1 for all applications. If all your responses in Step 1 are "No" then do not complete Step 2 (Screening Criteria). Sign and date the completed step-sheet and add it as the sensitive and non-publicly available OAR in ADAMS. If a "yes" response is indicated for any item in Step 1, also complete Step 2. If the type of use is subject to a Security Order or the requirements for increased controls, complete Step 3 (Item A or Item B) without delay. |  | Yes or No |
| A.  | The request is from a new applicant.   | No        |
| B.  | NUREG-1556, Volume 20, Section 4.9 indicates a licensing site visit is needed for the requested type of use, e.g., (1) Type A broad scope license, (2) panoramic irradiator containing > 10000 curies, (3) manufacturers or distributors using unsealed radioactive material or significant quantities of sealed material, (4) radioactive waste brokers, (5) radioactive waste incinerators, (6) commercial nuclear laundries, and (7) any other application that in the judgement of the reviewer and cognizant supervisor involves complex technical issues, complex safety questions, or unprecedented issues that warrant a site visit. | No        |
| C.  | The applicant requested certain radionuclides and quantities that equal or exceed the Risk Significant Quantity (TBq) values in the table, below, that have been "highlighted" by the reviewer and the applicant has not in the past been subject to such security Orders.   | No        |

**Table of Risk Significant Quantities**

(Category 2 Quantities, IAEA Safety Guide No. RS-G-1.9, Categorization of Radioactive Sources, August 2005)

| Radionuclide | Risk Significant Quantity (TBq <sup>1</sup> ) | Risk Significant Quantity (Ci <sup>1</sup> ) | Radionuclide | Risk Significant Quantity (TBq <sup>1</sup> ) | Risk Significant Quantity (Ci <sup>1</sup> ) |
|--------------|---|--|--------------|---|--|
| Am-241       | 0.6   | 16   | Pm-147       | 400   | 11,000                                       |
| Am-241/Be    | 0.6   | 16   | Pu-238       | 0.6   | 16   |
| Cf-252       | 0.2   | 5.4  | Pu-239/Be    | 0.6   | 16   |
| Cm-244       | 0.5   | 14   | Ra-226       | 0.4   | 11   |
| Co-60        | 0.3   | 8.1  | Se-75        | 2   | 54   |
| Cs-137       | 1   | 27   | Sr-90 (Y-90) | 10  | 270  |
| Gd-153       | 10  | 270  | Tm-170       | 200   | 5,400  |
| Ir-192       | 0.8   | 22   | Yb-169       | 3   | 81   |

<sup>1</sup> The primary values are TBq. The curie (Ci) values are for informational purposes only.

|  |                                 |
|--|---------------------------------|
| Calculations of the Total Activity or the Unity Rule were also completed to evaluate the application. <b>NOTE--If an amendment of an existing license is being requested, the calculations will include the previously authorized quantities for the radionuclide(s).</b>                        | Yes, No, or Not Applicable (NA) |
| Total Activity--multiple activities are requested for a single radionuclide and the sum of the activities equals or exceeds the quantity of concern for the radionuclide   | No                              |
| Unity Rule--multiple radionuclides are requested and the sum of the ratios equals or exceeds unity, e.g., [(total activity for radionuclide A) ÷ (risk significant quantity for radionuclide A)] + [(total activity for radionuclide B) ÷ (risk significant quantity for radionuclide B)] ≥ 1.0. | No                              |

Signature for Step 1: Dennis Lawyer / RA / 06/28/2006  
 License Reviewer Date

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OBTAIN BRANCH CHIEF APPROVAL BEFORE BEGINNING STEP 2.

**STEP 2--Screening Criteria:**

|  |              |   |
|--|--------------|---|
| <b>Instructions for Step 2:</b> Complete Step 2 for any application that yielded a "yes" response for any item in Step 1. The reviewer is expected to use safety information in the application as well as sources of information that are outside of the application. Document the review of each screening criteria below. For each criterion, provide a preliminary indication in the last column as to whether or not an additional evaluation may be needed to reasonably assure that the requested materials will be used as intended. Summarize the review below the table and sign, date, and place the completed step-sheet as the sensitive and non-publicly available OAR in ADAMS. If an additional evaluation of a potential security risk is needed, complete Step 3 (Item C) without delay. |              | Preliminary Indication--<br>Additional Evaluation in Step 3 Needed? (yes or no) |
| Refer to Initial Implementation Guidance (ML061080231) for each criterion, below.  | Review Notes |   |
| A. Request for Materials   |              |   |
| B. Former Licensee or Authorized User  |              |   |
| C. Ownership/Senior Management   |              |   |
| D. Radiation Safety Officer  |              |   |
| E. Authorized User   |              |   |
| F. Fee Payment   |              |   |
| G. Financial Assurance   |              |   |
| H. Deficiency correspondence   |              |   |
| I. Contacts to the applicant   |              |   |
| J. Public Web Sites  |              |   |
| K. Pre-Licensing Visit   |              |   |
| L. Security  |              |   |

**Summary:**

Summarize the preliminary indicators and decide whether or not an additional evaluation is needed to provide reasonable assurance that materials will be used as intended. Provide rationale to support the decision. To request an additional evaluation of a potential security risk, complete Step 3 (Item C) without delay.

Signature for Step 2: \_\_\_\_\_ / RA / \_\_\_\_\_ / RA /  
License Reviewer Date Supervisor Date

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**STEP 3--Notify NRC Headquarters (NMSS/IMNS/MSIB-A):**

Instructions for Step 3: Mark the type of notification below and attach a copy of the additional information, as appropriate. Place the completed step-sheet with attachments as the sensitive and non-publicly available OAR in ADAMS. Designated staff in IMNS will process the incoming email or TAR package. IMNS will reply to acknowledge receipt and indicate the action(s) and a proposed schedule to complete the action(s).

- 9A. **Security Orders** The cognizant supervisor sent an email to NMSS/IMNS/MSIB-A at [Security\\_Orders@nrc.gov](mailto:Security_Orders@nrc.gov). The email requested MSIB-A to prepare Orders to accompany the specific license and provided the applicant's contact information. A copy of the email is attached.
- 9B. **Increased Controls** The cognizant supervisor sent an email to NMSS/IMNS/MSIB-A at [Security\\_Orders@nrc.gov](mailto:Security_Orders@nrc.gov). The email requested MSIB-A to prepare Orders to accompany the specific license or requested MSIB-A to update the National Source Interim Inventory and provided a recently issued licensing action, e.g., to add or remove increased controls from a license or terminate a license. A copy of the email is attached. Remember, do not send SGI-M via email.

**Sample email:** "We have a licensing action that requires issuance of a Security Order. The applicant <insert name, docket no., control no.> has requested <insert radionuclide> to be used for <insert type of use> <insert, as appropriate, 'and which is equal to or exceeds the Step 1, Table of Risk Significant Quantities'>. Following is the applicant point of contact information for your use: <insert applicant name, mail address, phone, FAX, email>."

- 9C. **Request for additional evaluation:** As per NUREG-1556, Volume 20, Section 4.14, Technical Assistance Request--Materials Licensees, the cognizant supervisor sent a TAR package to NMSS/IMNS/MSIB-A after the screening criteria in Step 2 were evaluated. The license reviewer could not determine or has some doubt that radioactive material will be used as intended. The package included the TAR form and completed Step 2 worksheet. The package from an Agreement State supervisor was routed through the Regional State Agreements Officer as per Management Directive 5.7, "Technical Assistance for Agreement States," (revised November 19, 2004).

See sample TAR.

|                       |        |            |      |
|-----------------------|--------|------------|------|
| Signature for Step 3: | / RA / | / RA /     |      |
| License Reviewer      | Date   | Supervisor | Date |

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C.5 ☒ / if applicable ☐ / if not applicable APPENDIX C

## IDENTIFICATION OF SIGNIFICANT LICENSING ACTION POSSIBLE NEED FOR ONSITE INSPECTION PRIOR TO ROUTINE INSPECTION

### Official Agency Record

An onsite inspection of the licensee identified above must be considered due to a recent significant licensing action involving one or more of the criteria described below. Additional information is attached (if needed).

Check all that apply:

- ☐ Increased types and uses
- ☐ Physical move or temporary job site
- ☐ Authorization of satellite facilities
- ☐ Increased disposal authorization
- ☐ Significant increase in number of authorized users
- ☒ Change in Radiation Safety Officer

Date of Last Inspection: October 20, 2005 Results (Clear, #NOVs): Clear

Date of Next Scheduled Inspection: October 2010

### Reviewer Recommendation and Justification

- ☐ Change:
- ☒ No Change: New RSO has been involved in program and was the previous RSO

License Reviewer Approval: Dennis Lawyer / RA / Date: 06/28/2006

Change date of Next Inspection?

- ☐ No
- ☐ Yes - Next Inspection Date: \_\_\_\_\_

### Branch Chief Approval:

(Approval is only required when "Next Inspection Date" is recommended to be changed)

/ RA / Date: \_\_\_\_\_

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C.1

☐

/ if applicable

☒

/ if not applicable

APPENDIX C

## PERFORMANCE EVALUATION OF RENEWAL APPLICANT

### Official Agency Record

Records for the 5 years preceding this renewal application were reviewed and/or appropriate staff were interviewed with respect to the following performance indicators:

| Performance Indicator  | Conclusion |                          |    |                          | If YES, explain: |
|--|------------|--------------------------|----|--------------------------|------------------|
| Escalated Enforcement, or OI or OIG investigation occurred or ongoing                                      | Yes        | <input type="checkbox"/> | No | <input type="checkbox"/> |                  |
| Lost control of licensed materials presumed in public domain that is reportable or resulted in a violation | Yes        | <input type="checkbox"/> | No | <input type="checkbox"/> |                  |
| Unauthorized disposal or release of material that is reportable or resulted in a violation                 | Yes        | <input type="checkbox"/> | No | <input type="checkbox"/> |                  |
| An overexposure that resulted in a violation   | Yes        | <input type="checkbox"/> | No | <input type="checkbox"/> |                  |

If any of the above items are checked "YES," perform a Comprehensive Review using the applicable guidance contained in NUREG-1556. If all boxes are checked "NO," perform a Limited Review. An exception must be approved by a supervisor, documented on this form, or a copy of the documentation must be attached to this document for placement in the docket file.

Additional Information or Explanation of Exception:

The review should be:

☐

Comprehensive

☐

Limited

/ RA /

/ RA /

Reviewer / Date

Supervisor / Date  
(if exception granted)

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C.2

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/ if applicable

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/ if not applicable

APPENDIX C

## RENEWAL - LIMITED REVIEW CHECKLIST

### Official Agency Record

Use either a check mark to designate a satisfactory response, "NA" to designate not applicable or "D" to designate deficiency, as appropriate. Document areas receiving a focused or thorough review at the end of the checklist.

\_\_\_\_ NRC-313 or appropriate equivalent signed and dated by senior licensee representative.

\_\_\_\_ Check the possession limits and confirm that any decommissioning financial assurance remains adequate.

\_\_\_\_ Licensee name and address match the current license.

\_\_\_\_ Place of use is a physical location (i.e., not P.O. Box, etc.)

\_\_\_\_ RSO and key personnel are appropriately qualified.

\_\_\_\_ Facilities and equipment are adequate.

\_\_\_\_ All uses qualify for a categorical exclusion in 10 CFR Part 51.

\_\_\_\_ Organizational structure conforms with applicable regulations and NUREG-1556 guidance.  
\_\_\_\_ Reviewers are reminded licensees have the flexibility to provide information equivalent to that requested in NUREG-1556. (Appropriate individuals are present and are assigned necessary authority & responsibility.)

\_\_\_\_ New authorizations requested by the licensee and any major program elements that require change as a result of the new authorization structure conform with applicable regulations and NUREG-1556 guidance.

\_\_\_\_ Inspection records reviewed for issues to be resolved during licensing.

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## **RENEWAL - LIMITED REVIEW CHECKLIST**

**(Continued)**

**Major program changes, new high risk technology programs, and changes in control (ownership) normally require only a focused review of the specific changes. If these changes are so extensive that a Comprehensive Review of the entire application is needed, obtain Branch Chief approval before proceeding. Each of the following three items must be marked with NA or a check and the change briefly identified.**

- ☐ **Major program change conforms with applicable regulations and NUREG-1556 guidance.**
- ☐ **New high risk technology program conforms with regulations for similar technologies, guidance provided for similar technologies in NUREG-1556 guidance, and specific licensing conditions for the new technology.**
- ☐ **Change in Control (Ownership) conforms with applicable regulations and NUREG-1556 guidance. NOTE; Financial assurance documents can be affected by change of ownership.**
- ☐ **A brief overview of the remainder of the application found that the major areas discussed in the guidance on the contents of the application from the appropriate NUREG-1556 series are present.**
- ☐ **An obvious failure or a deficiency in a significant area resulted in a thorough review of that area. Document below.**
- ☐ **Additional information was requested, and an adequate response was received (circle request as appropriate: phone log / e-mail / fax / letter / \_\_\_\_\_).**
- ☐ **A Comprehensive Review was conducted, and the reason for changing from a Limited Review to a Comprehensive Review is documented on the "performance and Limited Review Check Lists."**

**Area(s) of Focused or Thorough Review:**