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United States
Department of
Agriculture

Office of the
Assistant Secretary
For Administration

Office of
Procurement
and Property
Management

Radiation
Safety Staff

5601 Sunnyside
Avenue
Room 2L205
Beltsville, MD
20705

July 18, 2006

Sattar Lodhi, Ph.D.
Region I
U.S. Nuclear Regulatory Commission
475 Allendale Road
King of Prussia, PA 19406

Br. 3

03004530

Docket No. 03004530

License No. 19-00915-03

Dear Dr. Lodhi:

This is in reference to our NRC License Number 19-00915-03 which was renewed on March 8, 2006. After reviewing the license and discussions with you, we have determined that that we did not include the list of USDA locations previously approved for incineration of low level radioactive waste and the detailed procedures for incineration in the application to renew our license. The enclosed document contains the list of locations where USDA incinerates radioactive waste and our incinerator procedures.

If you have any questions, please contact me on 301-504-2441.

Sincerely,

John T. Jensen
Director
Radiation Safety Staff

Enclosure

cc w/out enclosure:
R. Korcak, ARS

139165
NMSS/RGNI MATERIALS-002

**USDA Radiation Safety Staff
Incineration Procedures
July 2006**

1. A Location Radiation Protection Officer or Permit Holder will be responsible for the on-site and day-to-day supervision of incinerator operations. The training for these individuals will be in accordance with the requirements of License Number 19-00915-03. Individuals working in the area will be properly trained in the hazards associated with working in the area where radioactive materials are incinerated.
2. Contaminated materials will be incinerated only in chemical and physical forms that conform to the incinerator manufacturer's specifications. Contaminated laboratory trash and animal carcasses and related waste are the most prevalent incineration waste streams.

The waste will be segregated and labeled to indicate that it is for disposal incinerator disposal. The waste container will be labeled in accordance with license requirements and include the radioisotopes and activities.

3. The waste will be packaged to mitigate contamination and personnel exposure during transfer from the laboratory and/or storage area to the incinerator site. The waste will be stored in a secure storage area until it is incinerated.
4. Ash residue from radioactive waste incinerations will be collected and stored in a secure area until radioisotope analysis is complete. The ash will be analyzed using a qualified independent laboratory to determine the concentration of incinerated radioisotopes and will be disposed of appropriately, either as radioactive waste or normal trash. Alternatively, the USDA Radiation Safety Staff will review local procedures and determine that they can detect contamination levels below the quantity allowed for disposal as normal trash.
5. Records of each incineration will be maintained and will include the volume of material incinerated, radioisotopes, activities, effluent concentrations, and ash analysis. RSS will review these records to ensure compliance with program requirements.
6. The USDA operates incinerators at the sites listed below. These incineration procedures are applicable to all USDA incinerators.

Incinerator Location	Stack Height (ft)	Air Flow (CFM)	Distance to nearest non-USDA facility	Distance to nearest intake duct	Air cleaning equipment
Plum Island Animal Disease Center Greenport, New York	37	8400	450 ft	50 ft	None

**USDA Radiation Safety Staff
Incineration Procedures
July 2006**

National Animal Disease Center Incinerator Bldg 4 Ames, Iowa	53	7061	1 mi.	528 ft	None
National Animal Disease Center Incinerator Bldg 5 Ames, Iowa	46	5425	1 mi.	528 ft	None
U.S. Livestock Insect Laboratory Kerrville, Texas	26	765	641 ft	150 ft	None
U.S. Meat Animal Research Center Clay Center, Nebraska	20	680	4.15 mi	5,300	None
Biosciences Research Center Fargo, North Dakota	45	647	0.5 mi	50 ft	None

7. Prior to each incineration, we will calculate the effluent concentration for each radioisotope during the burn based on the estimated amount of radioactive material in the waste and the incinerator rated air flow. If the calculation indicates that the effluent for any burn-cycle will exceed the limits in 10 CFR Part 20, the waste will not be incinerated unless RSS determines that the incineration will not exceed the Annual Limits on Intake in 10 CFR Part 20.
8. RSS has reviewed the incinerator operations over more than 10 years at each location and has determined that the type of materials and the amounts of radioactive materials incinerated will not exceed the environmental release limits specified in 10 CFR Part 20.
9. RSS has confirmed that each incineration location has obtained appropriate local and State permits or authorizations.
10. Monitoring for personnel involved in incinerator operations is in accordance with the requirements of License Number 19-00915-03. No additional monitoring is required based on past experience in USDA incinerator operations. Effluent concentrations limits will not be exceeded based on the estimated activities in the incinerated materials and the rated airflow of the incinerator. Incinerator ash that exceeds limits for disposal as normal trash will be disposed at an appropriate radioactive or hazardous waste facility.

This is to acknowledge the receipt of your letter/application dated

7/19/2006, and to inform you that the initial processing which includes an administrative review has been performed.

Amendment 19-00915-03
There were no administrative omissions. Your application was assigned to a technical reviewer. Please note that the technical review may identify additional omissions or require additional information.

Please provide to this office within 30 days of your receipt of this card

A copy of your action has been forwarded to our License Fee & Accounts Receivable Branch, who will contact you separately if there is a fee issue involved.

Your action has been assigned **Mail Control Number** 139165.
When calling to inquire about this action, please refer to this control number.
You may call us on (610) 337-5398, or 337-5260.