DML:IB:NB (70971)

SEP 29 1965

Commanding Officer
U. S. Army Electronics Research
and Development Laboratory
Fort Monmouth, New Jersey

Dear Sir:

This refers to your application dated July 16, 1965, for renewal of License No. 29-1022-6.

We have reviewed the application and have the following comments:

1. Enclosure 7 specifies that for personnel working with tritium, an assay of 13 millicuries per liter of urine is investigated. The value for tritium in urine which would represent a body burden is 28 microcuries per liter.

2. Enclosure 9 which deals with leak testing does not indicate that all measurements will be quantitative. Please note that Condition 14.D. in the current license specifies that records of leak test results should be kept in units of microcuries. All leak tests measurements must be quantitative. Not so! AEC

3. Section 1.A. of Memorandum No. 385-5 specifies the use of Form AEC-313 for use by the Committee in review of requests for procurement of radioisotopes. Form AEC-313 is an Atomic Energy Commission form and should not be used for internal purposes. We have no objection to your using a form similar to Form AEC-313. The form desired should not be the mechanism for use of personnel desiring to use a radioisotope.

4. Section 2.c.(1) in the document entitled, "Procurement, Shipments, Transfer, Storage and Disposal" states "No radioactive materials will be hand carried in or out of the Laboratories greater than trace amounts as defined in Code of Federal Regulations, Title 10, Part 20." There is no definition of "trace amounts" of radioactive materials in 10 CFR 20. This section should be clarified.

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5. Section 6 of the document entitled, "Procurement, Shipments, Transfer, Storage and Disposal" states that records of receipt, location and use of all radioactive materials must be maintained by the Radiological Protection Officer as long as they remain in USARIND, and for four (4) years after their disposal. There is no time limit on the maintenance of records. Records must be maintained on a permanent basis.

Upon receipt of the revised procedures and instructions with respect to the matters noted above, we shall continue review of the application.

Sincerely yours,

Nathan Bassin
Isotopes Branch
Division of Materials
Licensing

cc: PGMA

bcc: Compliance, Region I

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REG. I, USAEC, N.Y.
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