



UNITED STATES  
**NUCLEAR REGULATORY COMMISSION**  
REGION I  
475 ALLENDALE ROAD  
KING OF PRUSSIA, PENNSYLVANIA 19406-1415

March 13, 2007

Docket No. 03019921  
Control No. 139009

License No. 52-13508-03

Gabriel A. Infante, Ph.D.  
Executive Director  
Pontifical Catholic University of Puerto Rico  
Colleges of Sciences  
Scientific Research Center  
2250 Avenida Las Americas, Suite 654  
Ponce, PR 00717-9997

**SUBJECT: PONTIFICAL CATHOLIC UNIVERSITY OF PUERTO RICO, REQUEST FOR ADDITIONAL INFORMATION CONCERNING APPLICATION FOR AMENDMENT TO LICENSE, CONTROL NO. 139009**

Dear Dr. Infante:

This is in reference to your letter dated June 16, 2006 requesting to amend Nuclear Regulatory Commission License No. 52-13508-03. In order to continue our review, we need the following additional information:

1. Based on the documents from Clean Harbors and Ecology Services, we understand that all solid materials from activities authorized by this license were disposed of in March 2004. If our understanding is incorrect, please inform us in writing.
2. Item 1.c. of our letter dated July 10, 2006, requested additional information to the survey results you provided in a letter dated June 16, 2006. Subsequently, you provided survey results in letters dated June 16, 2004; May 11, 2006; June 16, 2006; and October 17, 2006. These survey results are not sufficient for the following reasons:
  - a. The wipe survey results included with the letter dated June 16, 2004, did not specify the specific locations where wipes were taken, such as sink, floor, lab bench, hood, etc. Provide this information, if known. If the information is not known, then a new survey must be done, in which at least 30 wipes are taken with particular attention to any drains, air vents, or other fixtures or equipment that may have become contaminated during licensed material use. This is especially significant in situations where renovations have occurred and potentially contaminated areas may be inaccessible under current conditions.
  - b. None of the survey information provided included a 100% scan of the area with a radiation detector. Such a scan is required to confirm that there are no residual sources of radiation from activities authorized under this license. Provide results of a scan survey, and only to activities under this license.

- c. The carbon - 14 survey results included in the letter dated June 16, 2004, showed positive activity on several of the wipes. One of the criteria for unrestricted use is that the residual radioactivity has been reduced to levels that are As Low As Reasonably Achievable (ALARA). Please discuss how you determined that the residual radioactivity has been reduced to ALARA levels and requires no further decontamination.
3. Item 1.d. of our letter dated July 10, 2006, requested that you submit certain required records per 10 CFR 30.35(g), 30.36(k)(4), and 30.51. We understand that you disposed of some licensed material by disposal to the sewer. If our understanding is not correct, please inform us in writing. If it is correct, provide the records of disposal.
4. Based on our review of our records and documents you provided, we understand that you performed research and development activities under this license, typically laboratory studies performed on bench tops or hoods, that ceased in 1989. However, radioactive waste was stored until it could be disposed of in March 2004. We understand that only two laboratories were used for the activities performed under this license, comprising a total of approximately 180 square feet of space in a two-story building containing classrooms, laboratory, and office space for faculty. We further understand that the area is mixed residential/commercial. If any of our understandings are incorrect, please inform us in writing.
5. Please provide the size of the building that contains rooms Fe-119 and Fe-120 in square feet.
6. Please note that all information related to the termination of License No. 52-13508-03 and the confirmation that facilities authorized for use under this license do not contain residual contamination exceeding the NRC's license termination criteria, should be available for release to the public. Therefore, do not refer to materials authorized under other NRC licenses issued to you.

Current NRC regulations and guidance are included on the NRC's website at [www.nrc.gov](http://www.nrc.gov); select **Nuclear Materials; Medical, Academic, and Industrial Uses of Nuclear Material**; then **Toolkit Index Page**. Or you may obtain these documents by contacting the Government Printing Office (GPO) toll-free at 1-888-293-6498. The GPO is open from 7:00 a.m. to 8:00 p.m. EST, Monday through Friday (except Federal holidays).

We will continue our review upon receipt of this information. Please reply to my attention at the Region I Office and refer to Mail Control No. 139009. If you have any technical questions regarding this deficiency letter, please call Dennis Lawyer at (610) 337-5366.

G. Infante  
Pontifical Catholic University of Puerto Rico

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If we do not receive a reply from you within 30 calendar days from the date of this letter, we will assume that you do not wish to pursue your application.

Sincerely,

***Original signed by Elizabeth Ullrich***

Betsy Ullrich  
Senior Health Physicist  
Commercial and R&D Branch  
Division of Nuclear Materials Safety

cc:  
Carmen Asencio, Radiation Safety Officer

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**SUNSI Review Complete: DLawyer**

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