

OFFICE OF THE PROVOST

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May 10, 2007

License No. 07-01579-19 Docket No. 030-10925

Ms. Elizabeth Ullrich United States Nuclear Regulatory Commission, Region I Nuclear Material Section 475 Allendale Road King of Prussia, PA 19406-1415

Dear Ms. Ullrich:

The University of Delaware wishes to amend its Materials License to allow certain unsealed forms of licensed material to be used and stored at temporary job sites.

The University proposes to amend item 10.C. to read-

H-3 and C-14, and licensed material listed in 6.A, 6.C. through 6.E. and 6.G. through 6.I. may be used and stored at temporary job sites of the licensee anywhere the U.S. Nuclear Regulatory Commission maintains jurisdiction for regulating the use of licensed material, including areas of exclusive Federal jurisdiction within Agreement States. The possession limit for H-3 and C-14 shall be 25 millicuries per radionuclide (any form) at any temporary job site.

The following practices will be employed to ensure that the use of unsealed radionuclides at temporary job sites is conducted in a safe and compliant manner.

- The Radiation Safety Officer shall obtain the necessary information to determine that the facilities at the temporary work site are suitable for the use of unsealed sources. The criteria already established in the license shall be used (e.g. non-porous work surfaces and floors, properly functioning fume hood, proper posting, means of security, access to appropriate survey instrumentation, etc.). The Radiation Safety Officer will confirm that job site researchers are up-to-date on radiation safety training and that the radioactive material protocols have been approved by the Radiation Safety Committee.
- Job site researchers will be required to conduct surveys for contamination during their work as already established in the license. Job site researchers will also conduct clearance surveys of the job site at the conclusion of their licensed work following specific written instructions provided by the Radiation Safety Officer. Due to the small possession

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limits permitted for the radionuclides exceeding a 120d half-life (namely H-3 and C-14), unrestricted release can be demonstrated using the screening levels shown in Table B.1 of NUREG-1757, Vol. 1, Rev. 2. If residual contamination is found at levels below the screening level, it will be reduced to levels that are as low as reasonably achievable.

Job site researchers will ship all licensed material back to the University
of Delaware at the conclusion of work following NRC and DOT
regulations. Researchers involved in this activity will be appropriately
trained in pertinent transportation regulations and will prepare shipments
following specific written instructions provided by the Radiation Safety
Officer. In some cases, an authorized radioactive waste broker may
collect all, or some, of the licensed material at the temporary job site.

The University hopes to conduct some work with unsealed licensed material at the Barrow Arctic Science Consortium facility (Barrow, Alaska) for two weeks in July 2007. Your prompt review of this request would be much appreciated.

Should you have questions regarding this amendment request, please contact the University Radiation Safety Officer, William Fendt, at (302) 831-8475.

Respectfully submitted,

Dan Rich Provost

This is to acknowledge the receipt of your letter/application dated	
includes an administrative	, and to inform you that the initial processing which review has been performed.
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	
	peen forwarded to our License Fee & Accounts Receivable ou separately if there is a fee issue involved.
Your action has been assig When calling to inquire abo You may call us on (610) 3	out this action, please refer to this control number. 137-5398, or 337-5260.
NRC FORM 532 (RI) (6-96)	Sincerely, Licensing Assistance Team Leader