



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION III
2443 WARRENVILLE ROAD STE 210
LISLE, ILLINOIS 60532-4352
OCT 25 2007

Michael Ridenhower
Radiation Safety Officer
Severn Trent Laboratories - St. Louis
13715 Rider Trail North
Earth City, MO 63045

Dear Mr. Ridenhower:

Enclosed is Amendment No. 16 to your NRC Material License No. 24-24817-01 in accordance with your request. Please note that the changes made to your license are printed in **bold** font.

Please review the enclosed document carefully and be sure that you understand all conditions. If there are any errors or questions, please notify the U.S. Nuclear Regulatory Commission, Region III office at (630) 829-9887 so that we can provide appropriate corrections and answers.

Please contact me at either (630) 829-9841 or (800) 522-3025 if you have any questions or concerns about this amendment.

This also refers to the telephone conversation between you and me on October 24, 2007, concerning authorized users who are no longer employed by Severn Trent Laboratories - St. Louis. In this conversation you advised me that Joel Kernpema, William R. Deckelmann and Barbara S. Dihel are no longer employed by your company and you directed me to remove their names as authorized users at this time. This amendment has been prepared in accordance with your directive.

At this time I was unable to approve several requests made in your letter dated July 26, 2007, as described below. This is because the information provided was insufficient to complete my review.

If you wish to pursue these matters please submit a written response, as "additional information to control number 316406" and address it to my attention. I will then continue my review.

I also noted some discrepancies in your letter dated July 26, 2007, and in your license. Please address these items as requested below.

- 1. Subitem No. 6.F. authorizes "Plutonium" on your license but does not specify the isotope of plutonium authorized. Please specify which isotope of plutonium is authorized by your license.**
- 2. Your letter dated July 26, 2007, was not signed. Please note that all correspondence to us must be signed by a senior management representative in order for us to begin a licensing review. We subsequently received a signed version of your letter for this review. Please make a note of this requirement for future reference.**

3. **Your letter dated July 26, 2007, mentions that your company has been purchased by another company and the name has changed. Please note that you must receive NRC's consent, in writing, prior to changes of ownership and/or control involving NRC-licensed activities.**

Please submit the information in NUREG 1556, Vol. 7, Appendix E and refer also to Section 8.2 in that document for assistance. Please do not submit extraneous documents, especially proprietary information that we must protect, in accordance with 10 CFR 2.390, in support or in lieu of the information in NUREG 1556, Vol. 7, Appendix E.

4. **Your letter dated July 26, 2007, requests authorization to add and remove authorized users internally by means of a training program.**

I could not approve this request at this time because the information submitted was insufficient to complete my review.

We normally consider requests to name authorized users internally for programs such as yours when the need to amend the license is very frequent, such as more than several times per year. Your license does not appear to have needed frequent amendments in recent years.

Specifically, please justify and support your request to evaluate authorized users internally and describe the mechanism for this evaluation, i.e., who will be the individual(s) charged with the responsibility to evaluate proposed authorized users and what criteria will be used for this evaluation?

Also, please review 10 CFR 33.15(b), NUREG 1556, Vol. 7, section 8.7.2 and NUREG 1556, Vol. 11, sections 8.7.2 and 8.7.3, which address, in part, internal evaluation of authorized users. NUREG 1556, Vol. 11 is used for broad scope license applications, who typically require the autonomy to evaluate authorized users internally in order to function.

The vast majority of specific licensees of limited scope do not require this kind of autonomy. If you have further questions in regard to this request please contact me at either (630) 829-9841 or (800) 829-9500, ext. 9841.

5. **Please note that I deleted Condition No. 16., as it appeared on Amendment No. 15, because the relief afforded by this Condition is now captured by 10 CFR 20.1901(b).**

In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice," a copy of this letter and its enclosure will be available electronically for public inspection in the NRC Public Document Room or from the Publicly Available Records (PARS) component of NRC's document system (ADAMS). The NRC's document system is accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html> (the Public Electronic Reading Room).

You will be periodically inspected by NRC. Failure to conduct your program in accordance with

NRC regulations, license conditions, and representations made in your license application and supplemental correspondence with NRC will result in enforcement action against you. This could include issuance of a notice of violation, or imposition of a civil penalty, or an order suspending, modifying or revoking your license as specified in the General Statement of Policy and Procedure for NRC Enforcement Actions. Since serious consequences to employees and the public can result from failure to comply with NRC requirements, prompt and vigorous enforcement action will be taken when dealing with licensees who do not achieve the necessary meticulous attention to detail and the high standard of compliance which NRC expects of its licensees.

Sincerely,

A handwritten signature in cursive script that reads "Colleen Carol Casey".

Colleen Carol Casey
Materials Licensing Branch

License No. 24-24817-01
Docket No. 030-29601

Enclosure: Amendment No. 16