

800 W. Jefferson St.
Kirksville, MO 63501

Docket No. 030-12369
License No. 24-17210-01

660.626.2121
www.atsu.edu

September 5, 2008

ATTN: Document Control Desk
U.S. Nuclear Regulatory Commission
Washington, DC 20555-001

REPLY TO A NOTICE OF VIOLATION

This is the response to a Notice of Violation received on September 2, 2008 following a routine inspection at the Kirksville College of Osteopathic Medicine (KCOM) of A.T. Still University of Health Sciences by the U.S. Nuclear Regulatory Commission conducted on August 5, 2008 with continuing review through August 22, 2008. As required, this notice was posted for review at our institution on September 3, 2008 (it will be removed after September 19). A copy of the notice was also sent to each Authorized User by email on September 3, 2008. The three violations noted, the ensuing corrective steps taken by the RSO and the compliance dates are detailed below. In addition, the NRC cover letter asked about an amendment request that had been mentioned during the inspection. A copy of this amendment request, which was submitted on August 29, 2008, is attached as an **APPENDIX**.

Violation 1. A package containing approximately 250 microcuries each of Cerium-141, Scandium-46 and Strontium-85 was received during business hours on July 24, 2008 (actually July 30; July 24 is the date the shipment was ordered). Records showed that, in violation, not all of the monitoring assays required according to our materials license were completed as of August 5, 2008. Specifically, no data for package wipe assays were recorded on Form 2 held in the user's laboratory.

Corrective Steps:

1a: All current Authorized Users and Investigators working with radioactive materials will be provided a training session on radiation safety that covers the procedures involved in receiving and monitoring packages containing radioactive materials. Specifically, users will be instructed that package wipes need to be performed and counted within 3 business hours of receipt of a package to their laboratory. This training session is scheduled for September 19, 2008. To prevent future violations of this sort, this topic will be included in subsequent training sessions for new users and in the annual radiation safety inservice for all radiation workers.

1b: As of September 19, 2008, all Investigator's are required to submit to the RSO a copy of Form 2 (included within our materials license supplementary information) with the top half completely filled out (down through the section on Wipes of Pkg. Surfaces) within 3 days of receipt of a shipment of their radioactive material. Wipe data must be gathered using a liquid scintillation counter or a gamma counter, as appropriate to the radionuclide(s) in question. The goal of this action is to assure the RSO that Investigator's records are as complete as they need to be and that monitoring was performed in a timely fashion. These rules will be discussed at the September 19 meeting with all users. To prevent future violations of this sort, this topic will be included in subsequent training sessions for new users.

Full Compliance to Corrective Steps 1a and 1b will occur by: September 19, 2008

Violation 2. Inspection on August 5, 2008 revealed a stock supply of radioactive material (namely, approximately 250 microcuries each of Cerium-141, Scandium-46 and Strontium-85) in one user's laboratory that was not secured from unauthorized removal.

Corrective Steps:

2a: The user associated with this violation was the only user of radioactive materials on our campus that did not have a lockable container for radioactive stock supplies held in the laboratory. This user's plan had been to secure his supply of radioactive stocks by keeping the door to his lab locked when he or his trained workers were absent from the lab. This plan failed on August 5. After being informed of the issue, the user installed a locking mechanism on his supply container on September 3, 2008, as shown.



2b: To prevent the occurrence of future violations of this sort, all current Authorized Users and Investigators working with radioactive materials will be provided on September 19, 2008 a training session on radiation safety that covers the requirement that radioactive stock supplies must always be under lock and key or, if in use, the supplies must be under the direct supervision of the appropriate Authorized User or Investigator or his/her designee. This subject will also be included in future training sessions for new users and in the annual radiation safety inservice for all radiation workers.

Full Compliance to Corrective Steps 2a and 2b will occur by: September 19, 2008

Violation 3. Our current materials license specifies that disposal of radioactive materials by incineration will depend on an effluent flow rate of 2,550 cubic feet per minute for 480 minutes for each incineration. During the inspection, it was determined that the effluent flow rate of 2,550 cubic feet per minute for our incinerator actually could only be verified for 180 minutes during the initial period of each incineration. The flow rate for the remaining 300 minutes (during cool down of the incinerator) was presumed to be elevated by the RSO, but the actual rate is unknown. Thus, the calculations in our materials license determining maximum limits for disposal of radioactive by incineration were found on August 5, 2008 to be faulty and overestimated the disposal limits that should be allowed during our incinerations.

Corrective Steps:

3a: No incinerations of radioactive material have been performed since August 5, 2008 due to instruction from the RSO to the operator of the incinerator.

3b: By August 16, 2008, all users were informed of new maximum limits for incineration. These maximum limits have been recalculated on the basis of an effluent flow rate per incineration of 2,550 cubic feet per minute for 180 minutes. These revised calculations and disposal limits are shown below, and they are part of an amendment request to our materials license, which was delivered on August 29, 2008 to the NRC Region III office. The complete proposed amendment is attached as an **APPENDIX** to this document. Note: the number of radionuclides that may be incinerated has also been reduced as detailed below.

(Revised) Allowed Incinerator Emissions of Radionuclides

Radionuclides may be released into the air from KCOM at no more than the values for Allowed Incineration of Radioactive Materials Per Day (shown below). Data are derived from the Code of Federal Regulations 10, Part 20, Appendix B, Table 2 (Effluent Concentrations, Air), p336-385. Note: total aggregate quantities of radionuclides released per day may be no more than one daily limit, e.g., 1/2 daily limit of C-14 + 1/2 daily limit of H-3.

Nuclide	Allowed Effluent Concentrations in Air (µCi/ml)	Allowed Incineration of Radioactive Materials Per Day (µCi)*
Carbon-14 (CO ₂ upon incineration)	3.00E-07	3,900
Hydrogen-3	1.00E-07	1,300

*Calculations: Allowed Incineration of Radioactive Materials per Day (µCi) = NRC Allowed Effluent Concentrations in Air (µCi/ml) x Flow rate (2,550 ft³/min) x Conversion Factor (28,317 ml/ft³) x Incineration Time (180 min/day)

Example for C-14:

$$(3.00E-09 \text{ µCi/ml}) \times (2,550 \text{ ft}^3/\text{min}) \times (28,317 \text{ ml/ft}^3) \times (180 \text{ min/day}) = 3,900 \text{ µCi/day}$$

3c: Review of the half-lives of the radionuclides that we are currently allowed to incinerate revealed that, except for C-14 and H-3, our disposal needs can acceptably be met by “decay in storage” or transfer to a licensed off-site storage facility. With this in mind, our amendment request specifies that we will no longer use incineration as the means for disposal for 18 of our allocated 20 radionuclides (namely Ce-141, Cr-51, Inm-114, I-125, I-131, Ni-95, P-32, P-33, Rb-86, Ru-103, Sc-46, Sr-85, S-35, Te-m99, Sn-113, Co-57, Gd-153, Mn-54, and C-14, i.e., non-combustible to CO₂). This new and safer plan was put into action on August 16, 2008, and will be stated in our materials license once the proposed amendment request is approved.

Full Compliance to Corrective Steps 3a, 3b and 3b occurred by: August 16, 2008

Overall Full Compliance with all corrective steps listed above will occur by: September 19, 2008

Please let me know if you have any questions.



Neil Sargentini, Ph.D., RSO

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PERTINENT INFORMATION:

Applicant:

Kirksville College of Osteopathic Medicine, A.T. Still University of Health Sciences
800 West Jefferson
Kirksville, MO 63501

Radiation Safety Officer and Chair of Biohazards Committee:

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Certifying Officer:

Philip C. Slocum, D.O., FCCP, FACOI, FCCM
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cc:

Philip Slocum, D.O., Dean, KCOM

Regional Administrator
Nuclear Regulatory Commission
Region III
2443 Warrenville Road, Suite 210
Lisle, IL 60532-4352

APPENDIX

August 27, 2008

U.S. Nuclear Regulatory Commission
Region III
Materials Licensing Branch
2443 Warrenville Road, Suite 210
Lisle, IL 60532-4352

Re: Amendment to Materials License No. 24-17210-01

To the Materials Licensing Representative:

The following items (grouped below under 1-Radiation Safety Program, 2-Waste Management Program or 3-Training of Individuals) are submitted as proposed changes to our Materials License.

- 1. Radiation Safety Program. The RSO has determined that our program will be improved by *modifying our policy on surveying shipments of radioactive materials. Also, review of past records of radiation badges or ring exposures has shown no justification for requiring all workers to wear radiation badges or rings. This is consistent with the kinds and low amounts of radioactive materials that most workers use at our institution. Finally, RSO contact information needed to be added to our Spill Report Form. For these reasons, the following changes (in italic or strikeout script) to our license are proposed.***

1a. SURVEYING SHIPMENTS OF RADIOACTIVE MATERIALS

Changes to page 6 of Information Supplementary To NRC Form 313 For Renewal Of NRC Material License No. 24-17210-01, January 7, 2005:

Item 10b1: Maintaining the Inventory of Radioactive Material. The RSO audits usage and disposal of radioactive materials by AU or Investigators on a semiannual basis (May 1 and November 1 of each year) based on their submission of Form 1 (**Appendix G**), which summarizes use, disposal, decay, and transfer for each radionuclide. The RSO also reviews each order/delivery of radioactive material to KCOM to insure that AU or Investigator's do not exceed their possession limits, which are approved by the RSO. At the time of delivery of radioactive materials, Form 2 (**Appendix H**) is used by AU or Investigators to record relevant information and survey results for the package. *Completed versions of Form 2 (the top half of the page down through "Wipes of Pkg. Surfaces") are submitted to the RSO within 3 business days of receipt of radioactive materials.* Completed versions of Form 2 detailing dates of use and disposal of each radioactive material are submitted to the RSO during the semiannual inventory audit.

Changes to page 19 of Information Supplementary To NRC Form 313 For Renewal Of NRC Material License No. 24-17210-01, January 7, 2005:

APPENDIX H: Form (2) for Receipt, Use and Disposal of each Radioisotope

FORM 2

SEMI-ANNUAL RADIOISOTOPE REPORT

Within 3 business days of receiving this radioactive material, send a copy of this form (completed down through "Wipes of Pkg. Surfaces") to the RSO.

Name of User: _____ Date received: _____

Changes to page 22 of Information Supplementary To NRC Form 313 For Renewal Of NRC Material License No. 24-17210-01, January 7, 2005:

APPENDIX J: Safely Opening Packages Containing Radioactive Material

All packages containing radioactive materials are opened using the following procedures.

9. Maintain records of receipt, package survey, and wipe test results on Form 2 (**Appendix H**). *Send a completed version of Form 2 (the top half of the page down through "Wipes of Pkg. Surfaces") to the RSO within 3 business days of receipt of radioactive materials.*

1b. WEARING RADIATION BADGES OR RINGS

Changes to page 6-7 of Information Supplementary To NRC Form 313 For Renewal Of NRC Material License No. 24-17210-01, January 7, 2005:

Item 10c: Occupational Dose. We have done a prospective evaluation and determined that unmonitored individuals are not likely to receive, in one year, a radiation dose in excess of 10% of the allowable limits in 10 CFR Part 20. The RSO prepares an annual ALARA report, which summarizes KCOM occupational exposure data.

Upon request or if determined by the RSO, personnel working with radioactive materials will be provided wear a radiation monitoring badge and/or ring relying on Luxel OSL technology. These monitors will be exchanged on a quarterly schedule. Pregnant employees, who have declared their pregnancy, will be issued an additional fetal badge to be worn on the waist and exchanged monthly. Badges and rings are supplied by Landauer, Inc. (2 Science Road, Glenwood, Illinois)

Changes to page 24 of Information Supplementary To NRC Form 313 For Renewal Of NRC Material License No. 24-17210-01, January 7, 2005:

APPENDIX K, continued:

- (1) *Upon request or determination by the RSO, staff and students working with radioactive materials are provided and should wear a radiation monitoring badge and/or ring. Pregnant individuals, who elect to work with radioisotopes, should wear a waist badge to monitor fetal exposure to radiation. These monitoring devices are provided by KCOM on a quarterly basis (or monthly for waist badges used to monitor fetal exposure).*

Changes to page 26 of Information Supplementary To NRC Form 313 For Renewal Of NRC Material License No. 24-17210-01, January 7, 2005:

APPENDIX M: Procedures Involved with Research on Small Lab Animals

Instruction to Animal Caretakers Concerning Radioactivity in Animals

1. Personnel must wear lab coats and gloves whenever handling animals or carcasses.
2. Animal cages will be decontaminated by washing with detergent.
3. Rubber gloves will be worn by personnel.
4. The animal room will be surveyed for contamination by the RSO or delegate after each use of radioactive material.
5. All relevant animal caretakers must wear total body film badges, *upon request or if determined by the RSO.*

1c. RSO CONTACT INFORMATION ON SPILL REPORT FORM

Changes to page 29 of Information Supplementary To NRC Form 313 For Renewal Of NRC Material License No. 24-17210-01, January 7, 2005:

APPENDIX P: Radioactive Spill Report Form

INCIDENT REPORT OF CHEMICAL OR RADIONUCLIDE SPILLS
Emergency personnel contacted [e.g., Radiation Safety Officer (RSO), <i>Neil Sargentini; Work: 660-626-2474 or 2559; Home: 660-627-5806; Police, Fireman</i>]

2. Waste Management Program. The RSO has determined that our program will be improved by modifying our policy on incineration of radioactive materials, and by altering our calculation method for setting limits on radioactivity that may be disposed into the sewer. For these reasons, the following changes (in italic or strikeout script) to our license are proposed.

2a. INCINERATION

Changes to page 10 of Information Supplementary To NRC Form 313 For Renewal Of NRC Material License No. 24-17210-01, January 7, 2005:

3. Incineration. *Specified* radioactive materials may be disposed in the KCOM incinerator (in TBR) provided the gaseous effluent from incineration does not exceed the limits specified in **Appendix Q**. *All incinerations of radioactive material must each be approved, in advance, by the RSO.* Ash residues may be disposed of as ordinary waste provided appropriate surveys are made to determine that its radioactivity cannot be distinguished from background with typical low-level lab survey instruments. Ash residues with a half-life of 120 days or less may be held for decay-in-storage as described above. Ash residues with a half-life of greater than 120 days are stored for shipment to an authorized disposal site (see below). These residues are stored in marked barrels in the Radioactive Waste Storage Room (**Appendix F**).

Changes to page 30 of Information Supplementary To NRC Form 313 For Renewal Of NRC Material License No. 24-17210-01, January 7, 2005:

APPENDIX Q: Allowed Incinerator Emissions of Radionuclides

Radionuclides may be released into the air from KCOM at no more than the values for Allowed Incineration of Radioactive Materials Per Day (shown below). Data are derived from the Code of Federal Regulations 10, Part 20, Appendix B, Table 2 (Effluent Concentrations, Air), p336-385. Note: total aggregate quantities of radionuclides released per day may be no more than one daily limit, e.g., 1/2 daily limit of Cr-51 + 1/4 daily limit of P-32 + 1/4 C-14 + 1/2 daily limit of H-3.

Nuclide	Allowed Effluent Concentrations in Air (µCi/ml)	Allowed Incineration of Radioactive Materials Per Day (µCi)*
Carbon-14	3.00E-09	104
Carbon-14 (CO ₂ upon incineration)	3.00E-07	3,900 10,398
Cerium-141	1.00E-09	35
Chromium-51	3.00E-08	1,040
Cobalt-57	4.00E-09	139
Gadolinium-153	3.00E-10	10
Hydrogen-3	1.00E-07	1,300 3,466
Indium-114 ^m	9.00E-11	3
Iodine-125	3.00E-10	10
Iodine-131	2.00E-10	7
Manganese-54	1.00E-09	35
Niobium-95	2.00E-09	69
Phosphorus-32	1.00E-09	35
Phosphorus-33	4.00E-09	139
Rubidium-86	1.00E-09	35
Ruthenium-103	9.00E-10	31
Scandium-46	3.00E-10	10
Strontium-85	2.00E-09	69
Sulfur-35	2.00E-08	693
Technetium-99 ^m	2.00E-07	6,932
Tin-113	2.00E-09	69

*Calculations: Allowed Incineration of Radioactive Materials per Day (µCi) = NRC Allowed Effluent Concentrations in Air (µCi/ml) x Flow rate (2,550 ft³/min) x Conversion Factor (28,317 ml/ft³) x Incineration Time (180 480 min/day; i.e., only one incineration is performed per day and it takes all day from fire up to cool-down)

Example for C-14:

$$(3.00E-09 \mu\text{Ci/ml}) \times (2,550 \text{ ft}^3/\text{min}) \times (28,317 \text{ ml/ft}^3) \times (180 \text{ 480 min/day}) = 3,900 \text{ 104 } \mu\text{Ci/day}$$

Values can be averaged over the number of days in a given week that incineration is performed at the effluent flow rate cited above. Thus, if two incinerations are performed in one week, the allowed values for incineration cited above may be doubled 1 week such that 520 µCi of C-14 (i.e., 5 x 104 µCi) may be incinerated in one day if no other radioactive materials are incinerated in the same week.

2b. DISPOSAL TO SANITARY SEWER

Changes to page 31-32 of Information Supplementary To NRC Form 313 For Renewal Of NRC Material License No. 24-17210-01, January 7, 2005:

APPENDIX R: Allowed Release of Radionuclides to Sanitary Sewer – TBR Building

Radionuclides may be put into the sanitary sewer of the Timken-Burnett Research Building complex, in soluble form, at no more than the Allowed Activity per Day (shown below). Data are derived from allowed Monthly Average Concentrations from the Code of Federal Regulations 10, Part 20, Appendix B, Table 3 (Releases to Sewers), p336-385. Note: total aggregate quantities of radionuclides released per day may be no more than one daily limit averaged over a month, e.g., 1/2 daily limit of Cr-51 + 1/4 daily limit of P-32 + 1/4 daily limit of H-3.

Radionuclide	Monthly Average Concentration (µCi/ml)	Allowed Activity per Day (µCi)*	
Carbon-14	3.00E-04	395	304
Cerium-141	3.00E-04	395	304
Chromium-51	5.00E-03	6,585	5046
Cobalt-57	6.00E-04	790	602
Gadolinium-153	6.00E-04	790	602
Hydrogen-3	1.00E-02	13,170	10034
Indium-114 ^m	5.00E-05	66	50
Iodine-125	2.00E-05	26	20
Iodine-131	1.00E-05	13	10
Manganese-54	3.00E-04	395	304
Niobium-95	3.00E-04	395	304
Phosphorus-32	9.00E-05	119	90
Phosphorus-33	8.00E-04	1,054	802
Rubidium-86	7.00E-05	92	70
Ruthenium-103	3.00E-04	395	304
Scandium-46	1.00E-04	132	100
Strontium-85	4.00E-04	527	404
Sulfur-35	1.00E-03	1,317	1003
Technicium-99 ^m	1.00E-02	13,170	10034
Tin-113	3.00E-04	395	304

*Calculations: Allowed Activity Per Day (µCi) = NRC allowed Monthly Average Concentration of releases to sewers (µCi/ml) x Sewer Outflow (129,300 ft³/y 2,830 ft³/month) x Conversion Factors (12 month/y) (28,317 ml/ft³) (1/365 y/day) x Flow Reduction Factor (0.4 0.5). The one variable in these calculations is the Sewer Outflow. The value used here is the lowest monthly value over the last 42 months of data (Jan. 2005 thru May 2008), where values averaged 5,482 ft³/month and ranged from 2,830 to 9,620 ft³/month.

Example for C-14:

$$(3.00E-04 \text{ µCi/ml}) (129,300 \text{ ft}^3/\text{y } 2,830 \text{ ft}^3/\text{mo}) (12 \text{ mo/y}) (28,317 \text{ ml/ft}^3) (1/365 \text{ y/day}) (0.4 0.5) = 304 \text{ µCi/day } 395 \text{ µCi/day}$$

Values can be averaged over 1 month with prior permission of the RSO such that 9030 11,850 µCi of C-14 (i.e., 30 x 304 395 µCi) could be disposed in one day if no other radioactive materials were to be disposed over the 1-month period.

APPENDIX S: Allowed Release of Radionuclides to Sanitary Sewer – Admin. Building

Radionuclides may be put into the sanitary sewer of the old Administration Building, in soluble form, at no more than the Allowed Activity per Day (shown below). Data are derived from allowed Monthly Average Concentrations from the Code of Federal Regulations 10, Part 20, Appendix B, Table 3 (Releases to Sewers), p336-385. Note: total aggregate quantities of radionuclides released per day may be no more

than one daily limit averaged over a month, e.g., 1/2 daily limit of Cr-51 + 1/4 daily limit of P-32 + 1/4 daily limit of H-3.

Radionuclide	Monthly Average Concentration (µCi/ml)	Allowed Activity per Day (µCi)*	
Carbon-14	3.00E-04	545	219
Cerium-141	3.00E-04	545	219
Chromium-51	5.00E-03	9,077	3650
Cobalt-57	6.00E-04	1,089	438
Gadolinium-153	6.00E-04	1,089	438
Hydrogen-3	1.00E-02	18,154	7306
Indium-114 ^m	5.00E-05	91	36
Iodine-125	2.00E-05	36	15
Iodine-131	1.00E-05	18	7
Manganese-54	3.00E-04	545	219
Niobium-95	3.00E-04	545	219
Phosphorus-32	9.00E-05	163	66
Phosphorus-33	8.00E-04	1,452	584
Rubidium-86	7.00E-05	127	51
Ruthenium-103	3.00E-04	545	219
Scandium-46	1.00E-04	182	73
Strontium-85	4.00E-04	726	292
Sulfur-35	1.00E-03	1,815	730
Technicium-99 ^m	1.00E-02	18,154	7300
Tin-113	3.00E-04	545	219

*Calculations: Allowed Activity Per Day (µCi) = NRC allowed Monthly Average Concentration of releases to sewers (µCi/ml) x Sewer Outflow (129,300 ft³/y 3,900 ft³/month) x Conversion Factors (12 month/y) (28,317 ml/ft³) (1/365 y/day) x Flow Reduction Factor (0.4 0.5). The one variable in these calculations is the Sewer Outflow. The value used here is the lowest monthly value over the last 42 months of data (Jan. 2005 thru May 2008), where values averaged 4,822 ft³/month and ranged from 3,900 to 5,750 ft³/month.

Example for C-14:

(3.00E-04 µCi/ml) (129,300 ft³/y 3,900 ft³/mo) (12 mo/y) (28,317 ml/ft³) (1/365 y/day) (0.4 0.5) = 304 µCi/day 545 µCi/day

Values can be averaged over 1 month with prior permission of the RSO such that 9030 16,350 µCi of C-14 (i.e., 30 x 304 545 µCi) could be disposed in one day if no other radioactive materials were to be disposed over the 1-month period.

3. Training of Individuals. I have had a request to become a new Authorized User. Also, we have some investigators retire or change their employment. For these reasons, the following changes (in italic or strikeout script) to our license are proposed.

3a. NEW AUTHORIZED USER

John R. Martin, Ph.D. Dr. Martin is a professor in our department of Pharmacology and has been using H-3 since 2006 as an Investigator under my supervision as RSO. He presented to me a certificate verifying his completion of a 4-hour course in radiation safety at St. Louis University in 1985. Since 2006, he has attended annual in-service training seminars on radiation safety presented by a consulting health physicist at KCOM. His work at KCOM has relied on the use of H-3. The Biohazards Committee, chaired by the RSO, reviewed and approved Dr. Martin's request to become an authorized user. His name has been added to the list below.

3b. CHANGES IN AUTHORIZED USERS

Changes to page 14 of Information Supplementary To NRC Form 313 For Renewal Of NRC Material License No. 24-17210-01, January 7, 2005:

APPENDIX C: Authorized Users

Authorized Users of Radioactive Materials at KCOM
(All individuals below are listed in our current NRC license)

Authorized User	Material and Use
Robert W. Baer, Ph.D.	All
Richard J. Cenedella, Ph.D.	All
Neal R. Chamberlain, Ph.D.	All
James L. Cox, Ph.D.	All (excluding iodine-125 and iodine 131)
Charles R. Fleschner, Ph.D.	All
<i>John R. Martin, Ph.D.</i>	<i>All</i>
Orin B. Mock, Ph.D.	All
Krishnakant H. Pandya, Ph.D.	All
George W. Patrick, Ph.D.	All
James A. Rhodes, Ph.D.	All
Neil J. Sargentini, Ph.D.	All
William L. Sexton, Ph.D.	All
Melissa K. Stuart, Ph.D.	All
Lex C. Towns, Ph.D.	All
Nandor J. Uray, Ph.D.	All
Allan K. Willingham, Ph.D.	All

Additional Information:

Current Investigators at KCOM (Not to be listed on license)

Abbas Samadi, Ph.D.	Supervised by Neil J. Sargentini, Ph.D. (RSO)
Vineet Singh, Ph.D.	Supervised by Neil J. Sargentini, Ph.D. (RSO)



Neil Sargentini, Ph.D. 263

A.T. STILL UNIVERSITY | ATSU

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