

From: Dennis Lawyer
Sent: Monday, December 15, 2008 8:56 AM
To: jeff.govoni@noaa.gov
Subject: Department of Commerce, Request for Additional Information Concerning Application for a License Amendment, Control 142793

License No.: 32-00426-02
Docket No: 03005594
Control No: 142793

Dear John J. Govoni

This is in reference to your letter dated September 10, 2008 requesting for termination to Nuclear Regulatory Commission License No. 32-00426-02 and the additional letter dated December 5, 2008, which responded to our request for additional information. In order to continue our review, we need the following additional information:

1. In your letter dated December 5, 2008, you submitted a letter dated February 28, 1988, which showed the surveys for the room where the isotope vault was previously located. Since this area does not appear to meet ALARA criteria, please submit updated surveys or describe the location within the surveys already submitted as part of your "Inspection and Decommissioning Survey", dated October 5, 2008.
2. On the submitted, NRC Form 314, "Certificate of Disposition of Materials," you stated that you disposed of radioactive materials by sea dumping. Disposal by sea had been phased out in 1971. Please clarify what you mean as sea dumping. Submit documentation of any sea disposal after 1971.
3. The leak tests submitted as enclosure 11 appear to be receipt surveys and not leak tests on sealed sources. The last submitted survey was in 1995. Please provide the latest leak test for each of your sealed sources, including sources no long in your possession. If you never possessed sealed sources, please make that statement. If you do not have records of some sealed sources, make the statement that none of your sealed sources leaked, or give information surrounding the conditions associated with the source.
4. The surveys submitted in the October 5, 2008 report, "Inspection and Decommissioning Survey," were performed on the basis of carbon 14 as the only isotope. The license allowed and you used many other materials including cadmium 109, a non-beta emitter. For the surveys conducted, you need to determine efficiencies for the other types of radionuclides used during the life of the license to determine if the survey measurement methodology was acceptable.
5. The surveys submitted in the October 5, 2008 report, "Inspection and Decommissioning Survey," included surveys by direct method. In NUREG-1757, Volume 1, "Consolidated NMSS Decommissioning Guidance, Decommissioning Process for Materials Licensees", the simplified survey procedure (Listed on page 8-2) requires a one hundred scanning of all surfaces in the area of the facility where license material was used or stored. It does not appear that a scan was performed of the areas requesting released. If a scan was performed, please submit the sensitivity information of that scan for the isotopes used at the facility. If a scan was not performed, please perform a scan or submit the guidance followed to release the facility.

We will continue our review upon receipt of this information. Please reply to my attention at the Region 1 Office and refer to Mail Control No. 142793, If you have technical questions regarding this letter, please call me at (610) 337-5366.

Please note that you may not reply to this letter by return e-mail. Your reply must be in writing by letter or facsimile (610-337-5269). If we do not receive a reply from you within 30 calendar days from the date of this e-mail, we will assume that you do not wish to pursue your application.

E-mail Properties

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