

**From:** Dennis Lawyer  
**Sent:** Tuesday, April 21, 2009 2:48 PM  
**To:** cwatts@clymenvironmental.com  
**Cc:** petro.shandruk@fda.hhs.gov  
**Subject:** DEPARTMENT OF HEALTH & HUMAN SERVICES, REQUEST FOR ADDITIONAL INFORMATION CONCERNING APPLICATION FOR AMENDMENT TO LICENSE, CONTROL NO. 143643

Docket No. 03004544  
License No. 19-07538-01  
Control No. 143643

This is in reference to Mr. Shandruk's letter dated April 13, 2009 requesting to amend Nuclear Regulatory Commission License No. 19-07538-01. In order to continue our review, we need the following additional information:

1. The use of unsealed materials in Building T2 was not clearly stated. Were unsealed materials used in Building T2? If they were used, what isotopes, activity, and locations were used? If there was only storage of unsealed materials. Please state what isotopes, activity concentrations and location where unsealed material was located.
2. There is insignificant information to substantiate the chosen Derived Concentration Guidelines (DCGLs). The basis of the ratio of Cesium 137 to Barium 133 was not given. The basis for the determination of mixing the Americium 241 and Uranium 238 + C value was not given. The basis for using a Uranium 238 + C DCGL was not given. A reduction for using two different mixed DCGLs was not performed.
3. Please show the calculation and values used on page 10 for NUREG-1575, 6.7.2.1(6-8, 6-9)
4. Please show the calculation and values used on page 10 for NUREG 1575, 6.7.2.2 (6-13)
5. Please provide additional documentation for any quantitative analysis that was performed. This includes smear sample results, bias survey results, and quantitative surveys performed if levels above MDCR were detected on surface scans.
6. Please discuss how the instrument efficiencies were determined.
7. In support of an environmental assessment related to the release of your facility:
  - a) Provide the size of the complex (in Acres), and area to be released in square feet.
  - b) Describe the surrounding area, such as "residential", "industrial", "commercial", "mixed residential/commercial", etc.
  - c) Describe the general type of activities authorized on the license, such as "laboratory procedures typically performed on bench tops and in hoods."
  - d) State when you ceased licensed activities at this building.

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 **Regulations, Guidance, and Communications**. You may also obtain these documents by contacting the Government Printing Office (GPO) toll-free at 1-866-512-1800. The GPO is open from 7:00 a.m. to 6:30 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. 143643. If you have any technical questions regarding this deficiency letter, please call me at (610) 337-5366.

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

*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.*

Sincerely,

Dennis R. Lawyer  
Health Physicist  
Commercial and R&D Branch  
Division of Nuclear Materials Safety

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### E-mail Properties

Mail Envelope Properties ()

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Options

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