



DEPARTMENT OF HEALTH & HUMAN SERVICES

Public Health Service

National Institutes of Health
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Ms. Farrah Gaskins, Health Physicist
Region I, USNRC
475 Allendale Road
King of Prussia, PA 19406

L-4

19-00296-10

03001736

VIA FAX Mail Control # 144219

Dear Ms. Gaskins:

Please accept our responses to your requests for additional information below:

This concerns your application for an amendment to your license to add The National Institute of Allergy and Infectious diseases Integrated Research Facility (NAID-IRF) located on the U.S. Army Garrison at Fort Detrick in Frederick, MD. In order to continue with our review, we request the following information:

- 1) In your application dated August 13, 2008, you submitted the memorandum of understanding between NIH and the USAG at Fort Detrick as well as the final application for wastewater discharge authorization. At the time of the original application, facilities had not yet been completed at Fort Detrick to support your activities. Please confirm that there are no changes to the information provided in the documents you submitted. If any changes have occurred, please submit.

Response: The documents submitted with our amendment application have not been changed or amended as of this time. The facilities you reference as having not being completed are now either fully installed or in advanced stages of construction/installation such that their functionality can be adequately evaluated.

- 2) Attachment II provided information about low level waste management procedures. The attachment mentions disposal in the Ft Detrick incinerator. Your license does not permit the use of an incinerator. Please confirm that you will not use an incinerator to dispose of radioactive materials.

Response: No radioactive waste from the IRF will be disposed of via incineration.

- 3) In your application for wastewater discharge authorization that you submitted with your amendment, you mention "discharge standards to the sanitary sewer" in your discussion on cook tanks in BSL-4 areas. This could be confused with the release to sewer limits in 10 CFR 20 Appendix B Table 3. Note that the Fort Detrick sanitary sewer does not meet the NRC definition of public sanitary sewer and any releases should be in accordance with the limits for water effluent. Please confirm that any material released will be

evaluated with respect to the effluent limits in accordance with 10 CFR 20.1301 and Table 2 of Appendix B in 10 CFR 20.

Response: Any material released from the IRF will be evaluated with respect to the effluent limits in accordance with 10CFR20.1301, 10CFR20.1302 and Table 2 of Appendix B in 10 CFR 20.

- 4) In your wastewater discharge authorization application Appendix III, you discuss sampling and analysis procedures. In your introduction, you state "...reducing or eliminating requirements for sampling and analysis of every batch of wastewater from areas conducting redundant protocols if previous sampling of wastewater from the same protocols has not shown contamination above allowable discharge limits." Regulations set forth in 10 CFR 20.2107 state in part that licensees shall maintain records sufficient to demonstrate compliance with the dose limits for individual members of the public. Please confirm that your protocols for sampling effluent releases will be conducted such that you will meet the regulation.

Response: Our protocols for sampling effluent released will indeed be conducted such that we will meet the regulations set forth in 10 CFR 20.2107.

- 5) In your wastewater discharge authorization, Table 11 describes sampling locations and frequencies. The table does not address sampling of sewage sludge. Please describe your sampling procedures and its associated protocol for analysis of sampling sewage sludge to ensure that you are not exceeding regulatory limits.

Response: The IRF Analytical Lab will conduct its own independent analysis of USAG WWTP sludge and WWTP liquid for radioactive material content. The analysis will be done by liquid scintillation counting and high resolution quantitative gamma spectroscopy. The USAG only extracts and dries sludge for analysis occasionally - the garrison has agreed to share sludge samples with the NIH for analysis. The primary method to ensure that NIAID-IRF wastewater does NOT contain radioactive materials exceeding 10CFR 20 Appendix B, Table 2 levels will be routine radioanalytical analyses of effluent prior to discharge from the NIAID-IRF blending tank.

I hope that this information allows you to continue your review and approval of our amendment request.

Please contact me or Doug Carter if you need any additional information.


Bob Zoon, RSO, NIH

301-496-2254

Doug Carter, HP, NIAID-IRF

301-631-7226