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February 5, 2010

B-4

U.S. Nuclear Regulatory Commission  
Region I  
475 Allendale Road  
King of Prussia, PA 19406

Attn: Ms. Kathy Modes  
Division of Nuclear Materials Safety

RE: License No. 07-28386-01 – Docket No. 030-31174  
Amendment Request – Pasquill Gifford Dispersion Model

Dear Ms. Modes:

Tracerco is authorized pursuant to license conditions 9 and 17 of its NRC License No. 07-28386-01 to perform tracer studies. These studies may include the release of radioactive materials in gaseous effluents at the boundary of an unrestricted area, provided the annual average concentration of the radioactive material released does not exceed the values specified in 10 CFR Part 20, table 2 of appendix B. Pursuant to 10 CFR 20.1302, to demonstrate compliance with dose limits to members of the public we calculate the effluent release to ensure we do not exceed the values specified in 10 CFR Part 20, table 2 of appendix B. We calculate the gaseous effluent release using the **Pasquill-Gifford Atmospheric Dispersion Model**. We have been using this model for many years to demonstrate compliance, without any objection from the NRC or any other Agreement State agency having issued Tracerco a license to perform tracer studies involving a gaseous effluent release.

During a review of our license it has come to my attention that it is not referenced in our license documentation, either through a through license condition 17 or a correspondence letter list in license condition 19, that Tracerco utilizes the Pasquill-Gifford Atmospheric Dispersion Model to ensure compliance and the health and wellbeing of its employees and member's of the public. To avoid any future compliance issue, Tracerco is requesting that license condition 17 be amended or a new license condition added, verifying the acceptance of the Pasquill-Gifford Atmospheric Dispersion Model for determining 10 CFR 20.1302 compliance. Tracerco has a pending tracer job tentatively scheduled for sometime in March. Our customer is requesting that we provide documentation that the Pasquill-Gifford Atmospheric Dispersion Model is an acceptable method of determining regulatory compliance. Subsequently, we are requesting our amendment expedited and hopefully processed by the end of February.

Please contact me as soon as possible if additional information or clarification is required to process our amendment request.

Respectfully,

Norman P. Lanier  
Corporate Radiation Safety Officer

cc: William Mixon – Tracerco NE Region Manager  
Troy Votaw – Tracerco NE Area Supervisor/RSO  
Dave Ferguson – Tracerco Business Development Manager for Tracer Studies

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