



## Hawaii Agriculture Research Center

P.O. Box 100, Kunia, Hawaii 96759  
Ph: 808-621-1350/Fax: 808-621-1359

*Stahelen 4/20/10*

*April 30, 2010*

~~March 10, 2010~~

Robert Evans  
Nuclear Materials Licensing Branch  
U.S. Nuclear Regulatory Commission, Region IV  
612 E. Lamar Blvd. Suite 400  
Arlington, TX 76011-4125

RECEIVED

MAY 10 2010

DNMS

Subj: Response to February 9, 2010 email  
NRC License No. 53-00515-01  
Docket No. 030-06839 Control No. 472404

Dear Mr. Evans:

This letter provides the information requested in your email dated February 9, 2010.

### 1. Status of Room 446

The original diagram from the 1975 application doesn't include Rm 446 in the boundary of the controlled area. However, survey sheets from the 1980's indicate that a counter on one side of the room (closest to room 451) was included on routine surveys. This counter and floor were last surveyed on February 23, 1995 as part of a dis-establishing survey for this area. Radioactive material has not been used in this area since that time. This room was renovated and divided into two separate work areas in 2007. The drawings submitted with the decommissioning survey shows the new wall. Figures 15, 16, 17, and 18 have been modified to show the missing room numbers. The portion of room 446 closest to room 451 (now labeled as 446(A)) was surveyed and wipe tested during the final status survey, as shown in Figure 18.

### 2. Use of room 147

Room 147 was added to the license in an amendment request dated May 27, 1992. Work involving radioactive materials never started in this area, and the area was never included in the monthly contamination surveys.

### 3. New Aiea Greenhouse

The proposed greenhouse mentioned in the letter dated August 25, 1994 was never built.

#### 4. Second floor use areas

The renewal application submitted in November 1994 included a procedure for establishing restricted areas. The drawings submitted with the application showed the areas which could be established as restricted areas in the future. Rooms 229, 231, 234, 235, 236, 242, and 246 were never established as restricted areas.

#### 5. Third floor room numbers

The drawing of the third floor submitted with the license application in November 1994 was not detailed with most of the room numbers. You may want to refer to the drawing submitted with the 1975 application, which shows the main lab area (Rooms 336 - 351), but does not include Room 328. The rooms indicated in the decommissioning survey report are the only rooms which have been radioactive material use areas.

#### 6. Rooms 413-416

Rooms 413, 415, and 416 were never established as radioactive material use areas. Rooms 413 and 416 are offices, and Room 415 is an adjacent lab which was not a restricted area. Figures 15, 24, and 25 have been modified to show these room numbers, and are attached.

If you require any additional information, please contact our Radiation Safety Consultant, Ronald Frick, at 808-373-7009.

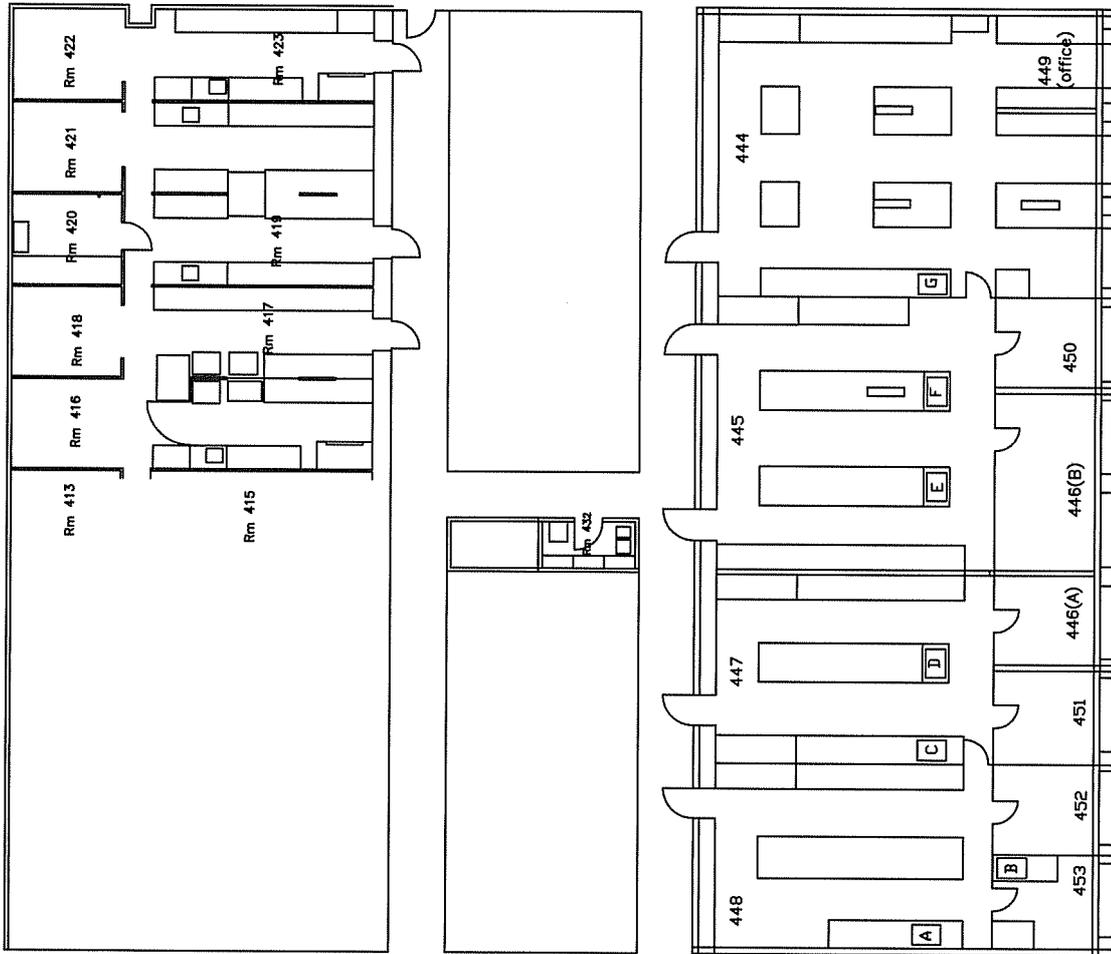
Sincerely,  
Hawaii Agriculture Research Center



Stephanie A. Whalen  
Executive Director

Enclosures

Figure 15  
Fourth Floor Overview



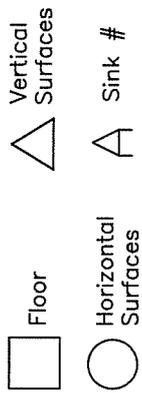
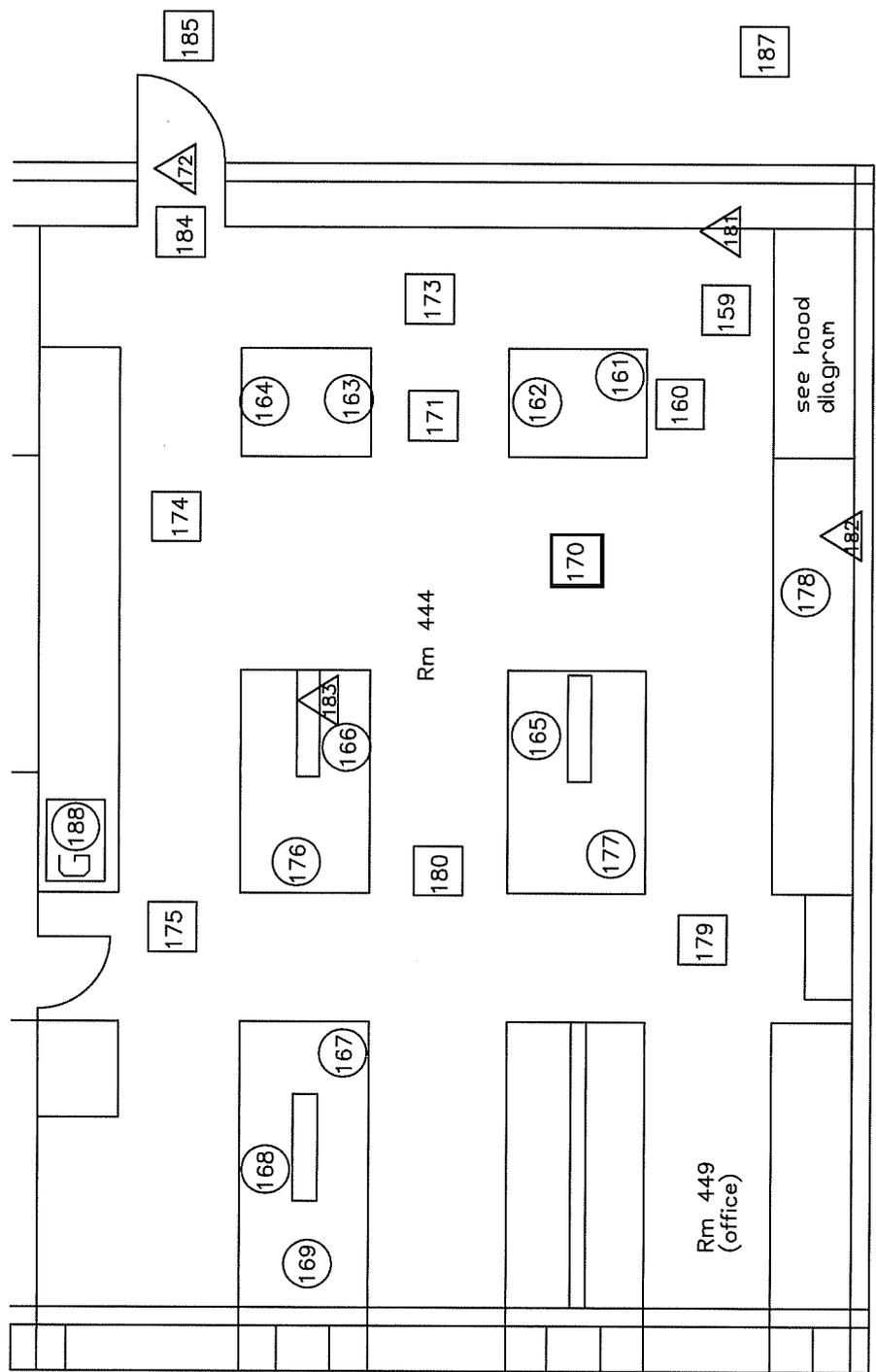


Figure 16  
LAB 444

Location is outside  
of room 432 door



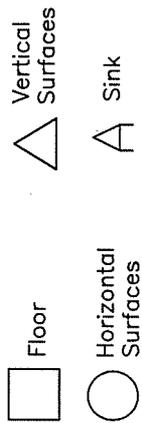


Figure 17  
LAB 445

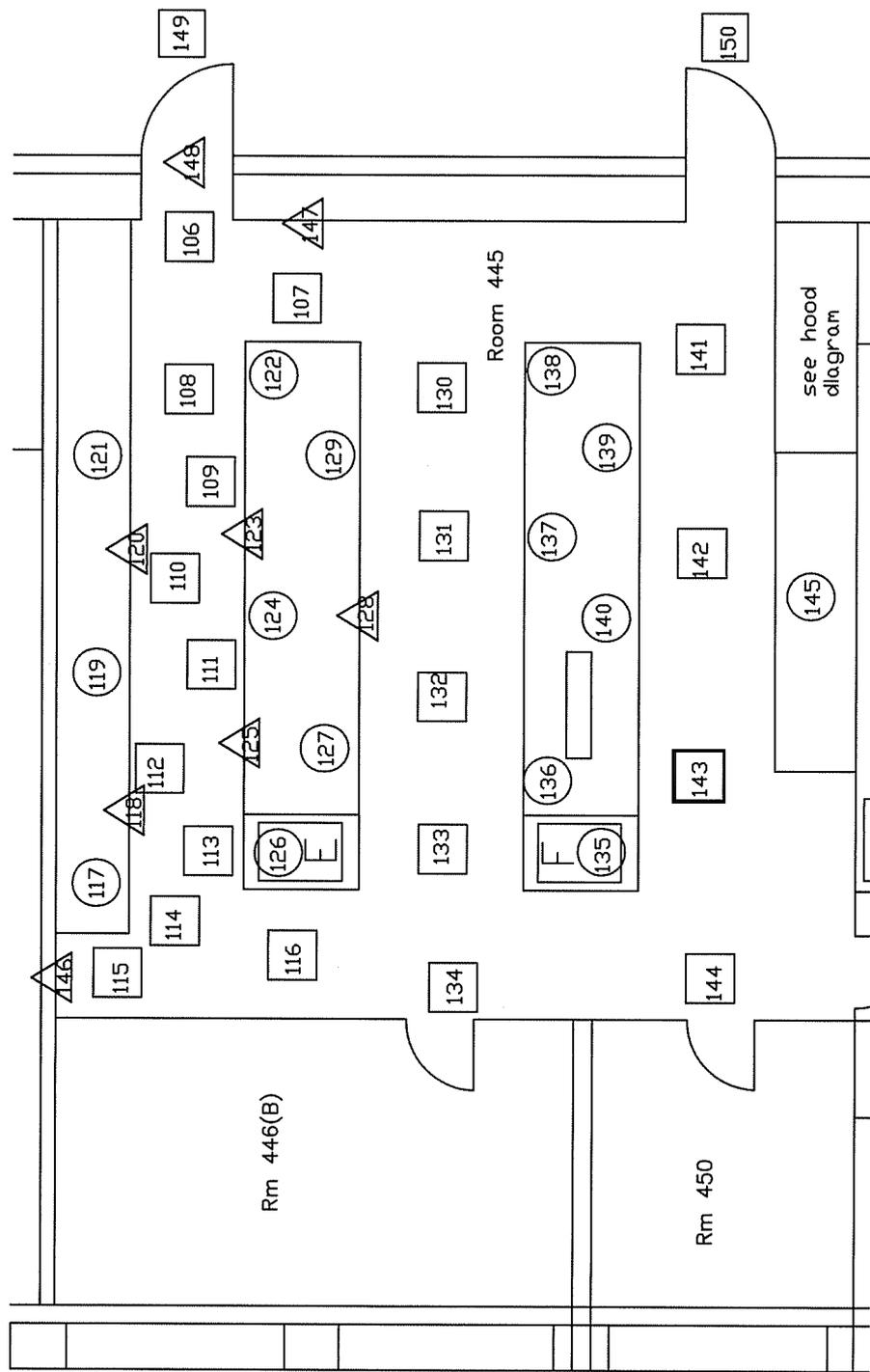


Figure 18  
LAB 447

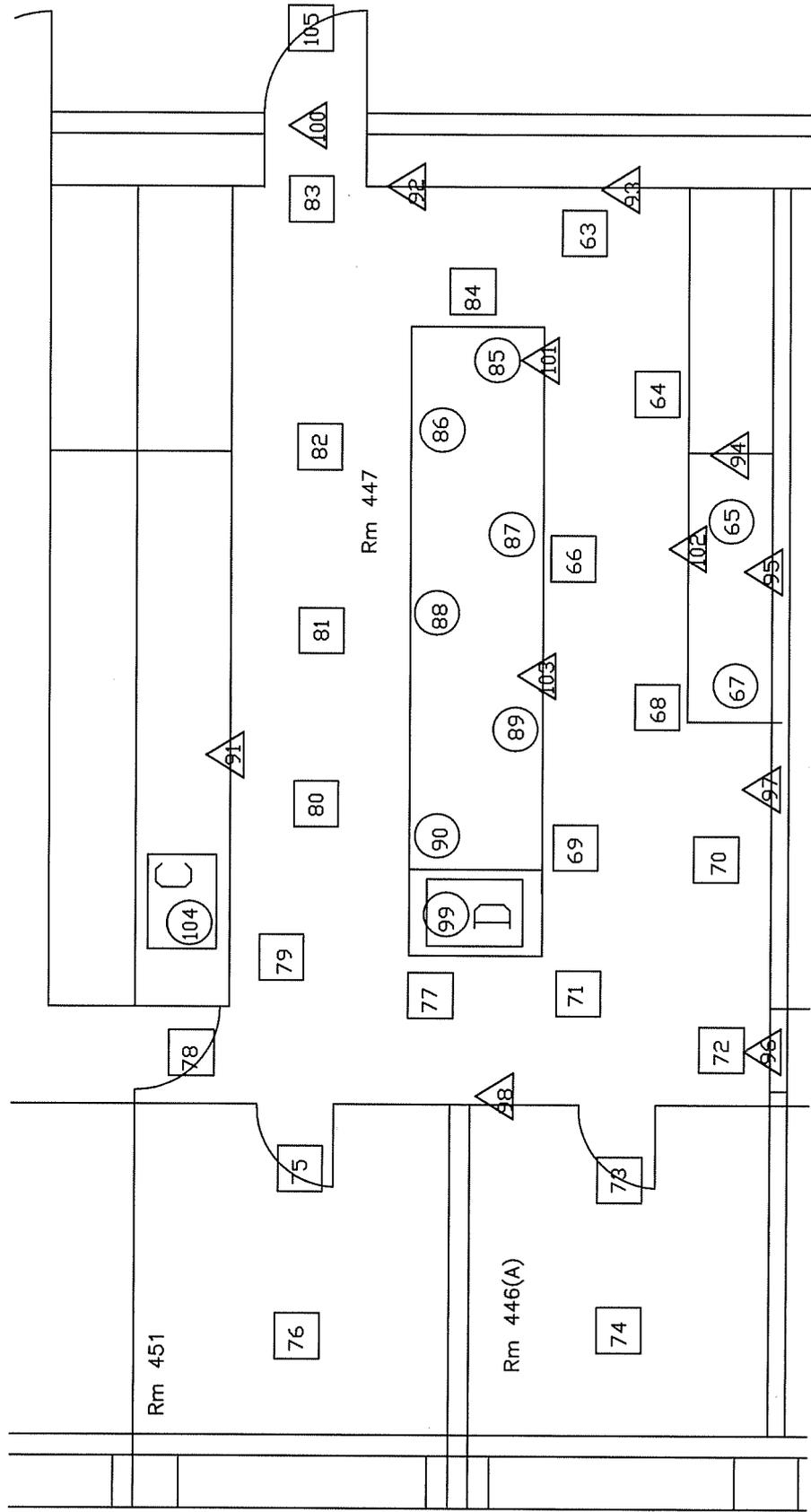
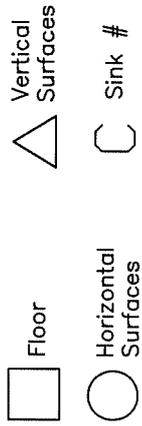
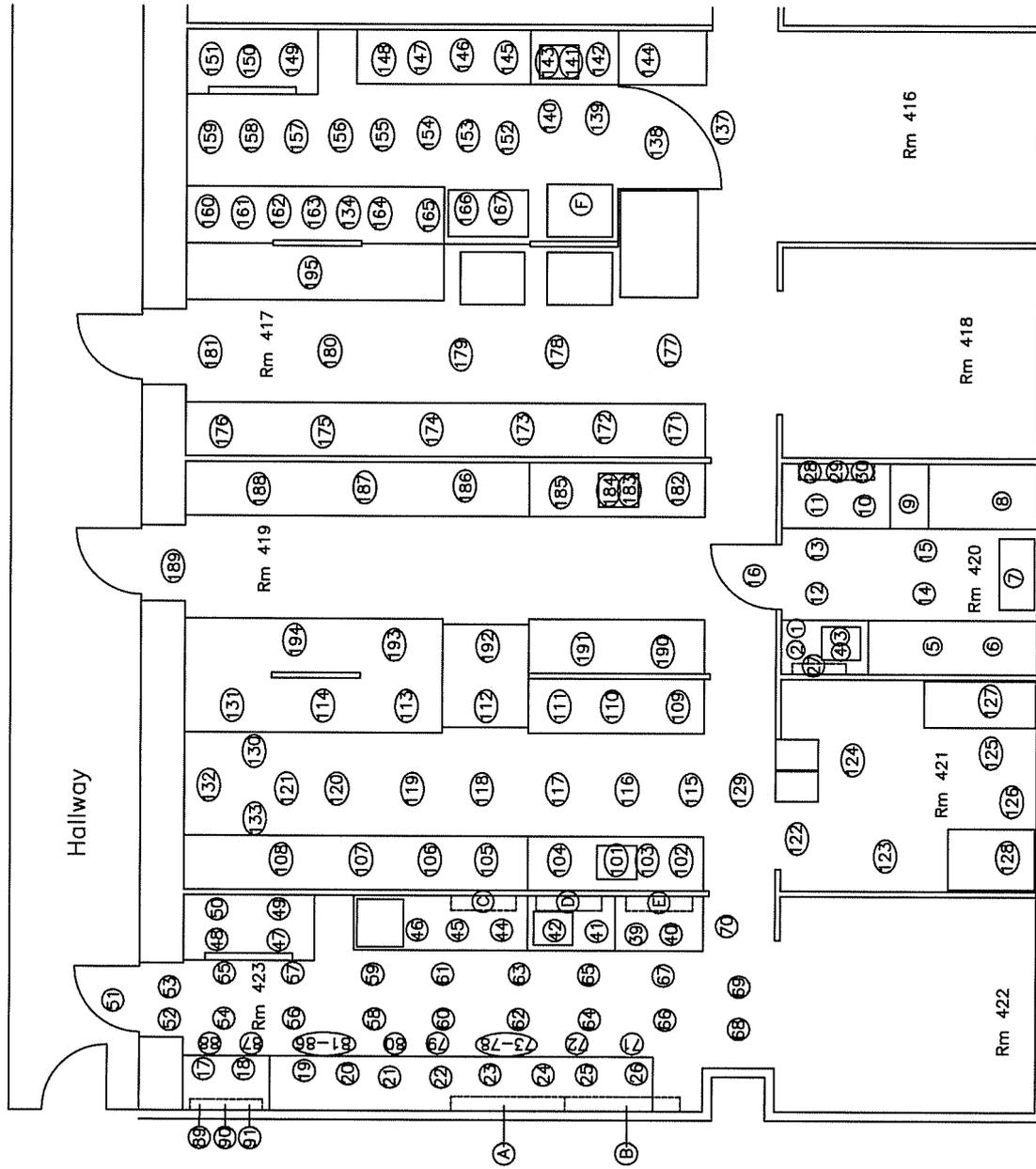
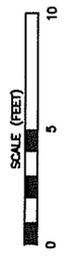


Figure 24  
 Labs 417-423  
 August 12, 2004 Survey



- 3: sink
- 4: deep sink drain
- 27: Shelf
- 28-30: Shelves 1,2,3
- A: Wipes 31,33,35,37 on shelves 1-4
- B: Wipes 32,34,36,38 on shelves 1-4
- 43: Deep sink drain at location 42
- 71-88: Drawers
- 89-91: Shelves 1-3
- C: Wipes 95-97 on shelves 1-3
- D: Wipe 94 on shelf 1
- E: Wipes 92,93 on shelves 1,2
- F: Wipe 168: freezer floor, 169: shelves, 170: freezer door
- 141, 184: deep sink drain

FACILITY		Gamma Corporation 850 W Hind Dr #116 Honolulu, HI 96821	
APPROVALS	DATE	ROOM	
DRAWN		99-193 Alea Heights Drive Alea, HI 96701-3900	
CHECKED			
ISSUED		R. Frick	



1 2 3 4

1 2 3 4

D C B A

D C B A

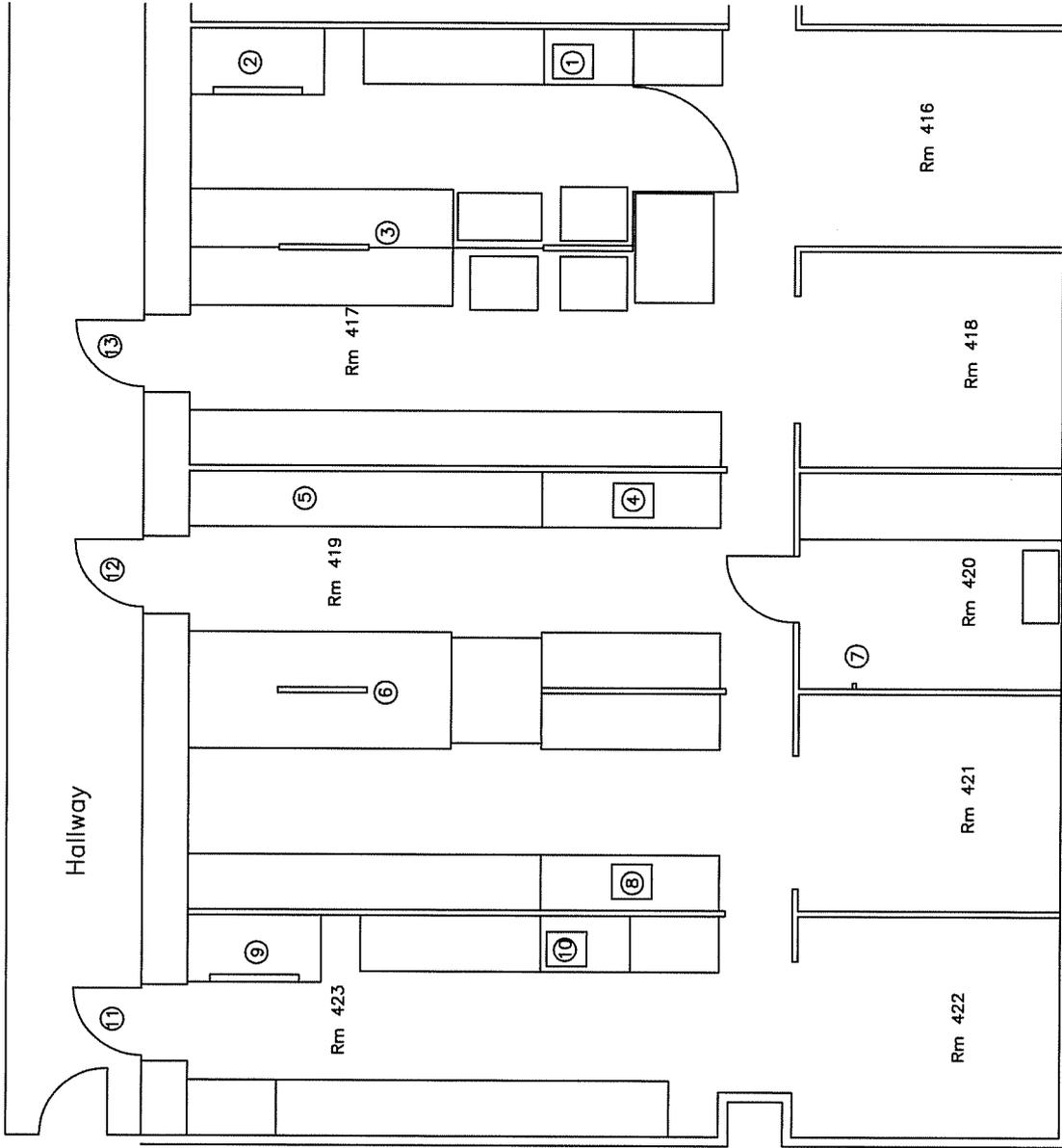
4

3

2

1

Figure 25  
 Labs 417-423  
 February 4, 2005 Survey



Hallway

Rm 415

Rm 417

Rm 419

Rm 423

Rm 413

Rm 416

Rm 418

Rm 420

Rm 421

Rm 422

D

C

B

A

D

C

B

A

4

3

2

1

APPROVALS		DATE	FACILITY
DRAWN	CHECKED		Gamma Corporation 850 W Hind Dr #116 Honolulu, HI 96821
ISSUED			Hawaii Agriculture Research Center
ROOM		ROOM	
R. Frick		99-193 Aiea Heights Drive Aiea, HI 96701-3900	

## Evans, Robert

---

**From:** Blake Vance [BVance@harc-hspa.com]  
**Sent:** Tuesday, February 09, 2010 3:43 PM  
**To:** rfrick@gammacorp.com  
**Cc:** Evans, Robert; Mjackson@harc-hspa.com  
**Subject:** (Fwd) Request for Additional Information - Hawaii Agriculture

Hi Ron:

Please respond to Mr. Evans concerns below.

Thank you for your assistance,  
Blake Vance

----- Forwarded message follows -----

**From:** "Evans, Robert" <Robert.Evans@nrc.gov>  
**To:** "bvance@HARC-HSPA.com" <bvance@HARC-HSPA.com>  
**Copies to:** "Spitzberg, Blair" <Blair.Spitzberg@nrc.gov>, "Browder, Rachel" <Rachel.Browder@nrc.gov>  
**Date sent:** Tue, 9 Feb 2010 14:52:09 -0600  
**Subject:** Request for Additional Information - Hawaii Agriculture Research Center

Blake Vance,

I've reviewed the HARC request dated September 8, 2009, to remove the facility located at 99-193 Aiea Heights Drive from license 53-00515-01.

I conducted a docket file review to determine if all locations of use were included in your letter. Several areas were identified in the docket files that were not mentioned in your letter. Please review these additional locations of use, and give us your response, in writing, for these locations. For example, were these rooms ever used, were they surveyed and released in the past, or were the room numbers revised at some point in the past.

The original application dated July 25, 1975, for 99-193 Aiea Heights Drive included a statement that radioactive materials would be used in Rooms 444-448. Room 446 was specifically mentioned in the application. Only rooms 444, 445, 447, and 448 (not 446) were listed in later applications. The current status of room 446 is not clear.

The renewal application dated October 31, 1994, included Room 147. This room was listed in application Item 9.A.1 and Attachment 9.1-1. [Figure 9.1-1 was subsequently submitted to the NRC by separate letter dated November 8, 1994, because it was accidentally left out of the original application package.] However, this room and associated figure were later dropped from the March 22, 2005, renewal application. I was unable to locate any release records for this room in the docket files.

License amendment 56 dated April 3, 1995, removed an outdoor greenhouse at Aiea Heights Drive (Condition 20.A, letter dated August 25, 1994, second item in letter). However, this same amendment approved the construction of a new outdoor greenhouse at Aiea Heights Drive (Condition 20.D, letter dated November 22, 1994, second item in letter). This outdoor greenhouse was not mentioned in the renewal application dated March 22, 2005. The current status of the greenhouse was not determined through this docket file review.

Figures 9.1-2 through 9.1-5, submitted to the NRC on November 8, 1994, are identical to Figures 9.1-1 through 9.1-4 submitted to the NRC by renewal application dated March 22, 2005. The rooms listed in the figures don't agree with the rooms mentioned in the September 8, 2009, letter. Figure 9.1-2 (9.1-1 in renewal application) includes rooms 229, 231, 234, 235, 236, 242 and 246. These rooms are not listed in the September 2009 letter. The figure for the third floor does not clearly show all rooms by number, so a room by room check could not be conducted. Finally, Figure 9.1-5 (9.1-4) shows rooms 413-416 which are not included in the September 2009 letter.

These discrepancies must be resolved before we can process the amendment to release the building.

Thanks for your time.

Robert Evans