

From: Ullrich, Elizabeth
Sent: Friday, May 14, 2010 3:16 PM
To: nrasmianfar@hsc.wvu.edu
Subject: an additional question/issue with the new license application

Nassar,

After going over the recent response you sent, I identified one issue with the Certification of Financial Assurance (CFA) that needs to be fixed. But it brought up another issue regarding your proposed license limits.

The CFA needs to list the types and quantities of RAM that require financial assurance (those with half-lives greater than 120 days) that are identical to those types and quantities listed on the license. The list on the CFA dated March 18, 2010 shows the types and quantities you expect based on the calculations you ran. So...this will need to be fixed - another CFA will need to be submitted.

BUT before you do that, I drafted a license to see what the types and quantities would be, as listed on the license. Here is what I have:

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|--|------------------------------------|--|
| A. Any byproduct material with atomic numbers 1 through 83 | A. Any | A. 2 curies per radionuclide and ?? curies total |
| B. Nitrogen 13 | B. Any | B. 3 curies |
| C. Fluorine 18 | C. Any | C. 60 curies |
| D. Any byproduct material with atomic numbers 1 through 83 | D. Incidentally Activated Products | D. 200 millicuries per radionuclide and 3.5 curies total |
| E. Any byproduct material authorized under 10 CFR 35.65 | E. Sealed Sources | E. 5 millicuries per source and 50 millicuries total |

What do you really want for the limits for 6/7/8 A, 1-83 byproduct material, which is product for customers? In your original application, you requested 2 curies but did not specify 2 curies per radionuclide or 2 curies total. I missed this, and did not ask you for more specific limits, so please let me know what you want here. If you intend this to only include RAM with half-lives less or equal to 120 days, than it would not affect your financial assurance or have to be listed on the CFA.

It is Items A and D as shown above that need to be listed on the CFA. Item E quantities are too small to be required for inclusion.

Please call me to talk about this, so I don't cause you further problems.

thanks,
Betsy
610-337-5040 or email elizabeth.ullrich@nrc.gov

E-mail Properties

Mail Envelope Properties ()

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From: Ullrich, Elizabeth

Created By: Elizabeth.Ullrich@nrc.gov

Recipients:
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Options

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Recipients received: