

From: Ullrich, Elizabeth
Sent: Thursday, May 27, 2010 1:43 PM
To: Teachout@afri.usuhs.mil
Subject: FW: questions regarding your NRC license

From: Ullrich, Elizabeth
Sent: Thursday, May 27, 2010 1:42 PM
To: 'teachout@affri.usuhs.mil'
Subject: questions regarding your NRC license

Ms. Teachout,

We are doing an administrative review of all licenses for 1) conformance with the requirements to clearly show the maximum possession limits and 2) our annual financial assurance review. As a result of this review, we will be amending License No. 19-08330-02. However, prior to amending the license, I need to confirm some items. I left messages on your voice mail requesting that you contact me, and am also sending this email with a more detailed explanation.

1. With regard to the maximum possession limits (control 144523),
 - a). for Items 6/7/8 A, B, C, D G and I, we will be adding the phrase "and see Condition 13" to the possession limit. In many cases, the condition 13 limit and the FA unity rule will be more restrictive than the individual radionuclide limits.
 - b) the limits in Item 8.I for atomic numbers 84 - 103 must be reduced. The stated Part 30 App C financial assurance limits are 10 mCi for Po210, 1 mCi for Ra226, 1 mCi for Am241, 10 mCi for any other beta-gamma emitter and 1 mCi for any other alpha emitter. I propose to reduce 8.I. to "10 millicuries per radionuclide and 10 millicuries total, and see Condition 13". Please confirm that you currently do not possess any 84-103 radionuclides in quantities that exceed the applicable limits (based on the past 2 inspections, you did not have any).

2. With regard to the financial assurance issues (Control 144522):
 - a) your DFP for the special nuclear material was submitted in 12/5/2006. Current regulations require that a DFP be reviewed at least every 3 years and new FA submitted if the review identifies that the cost estimate has increased. Please provide the date of your most recent DFP review, and confirm if a new cost estimate was determined for which increased FA is required.
 - b) amendment 63 of your license lists Item O as Pu238, although all previous amendment list is as Pu without designating a mass number. This appears to be our error, and I will correct it to be Pu again, unless you object. At the moment, your Certificate of Financial Assurance (CFA) lists Pu as an item for which the DFP/Statement of Intent is provided. If you want Pu238 on the license, the CFA will have to be revised to list Pu238 instead of Pu.
 - c) your Cs137 AN/UDM-1A source was removed from your license recently, but the CFA was not updated to remove this item from the list.
 - d) the changes in line item 6/7/8.I limits should also be revised on the CFA.

I will be sending you a separate letter regarding the financial assurance issues, pending your response to this email or a telephone discussion of the above items.

thanks,
Betsy
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E-mail Properties

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Subject: FW: questions regarding your NRC license
Sent Date: 5/27/2010 1:42:28 PM
Received Date: 5/27/2010 1:42:00 PM
From: Ullrich, Elizabeth

Created By: Elizabeth.Ullrich@nrc.gov

Recipients:
Teachout@afri.usuhs.mil (Teachout@afri.usuhs.mil)
Tracking Status: None

Post Office:

Files	Size	Date & Time
MESSAGE	11310	5/27/2010

Options

Expiration Date:
Priority: 0ImportanceNormal
ReplyRequested: False
Return Notification: False

Sensitivity: 0Normal
Recipients received: