



June 14, 2010

Colleen Carol Casey
Material Licensing Branch
Division of Nuclear Material Safety
U.S. Nuclear Regulatory Commission, Region III
2443 Warrenville Road
Suite 210
Lisle, IL 60532-4352

Subject: License #22-00057-61
Additional Information to Control Number 318768

Dear Ms. Casey:

Thank you for processing Amendment #43 of our license.

This letter provides additional information to clarify the following statement included in the first paragraph of our January 20, 2010 submission:

"...However, we reserve the right to change procedure names and numbers and modify procedure content so long as they continue to meet the same criteria as those described here..."

The "criteria" referred to in the above quotation are the 12 commitments in Attachment 3 of our October 9, 2009 submission (copy attached). The present manner in which 3M implements these commitments is explained in Attachments 1-6 of our January 20, 2010 submission. We request the flexibility to make minor changes to the documents referenced in the January 20, 2010 submission.

We added the sentence quoted above in our submission because, for instance, the process described in SOP-LAB-05-000020 is used for many other products besides the flammable liquids irradiated at the Brookings facility. Changes to SOP-LAB-05-000020 may be needed in regards to these non-Brookings products, but which will not affect products irradiated at Brookings. As described in the last two paragraphs on page 1 and the first paragraph on page 2 of our January 20, 2010 submission, changes impacting flammable products to be irradiated at Brookings will be controlled by the Product Engineers having "ownership" over the flammable products.

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Other reasons for adding the quoted statement above in our submission include:

- Editorial changes to SOP-LAB-05-000020, STER-ASSESS-05-127360, Brookings SOP 81 Supplement R or SOP 82 Supplement R may occur in future revisions (changes to names, numbering or paragraph conventions, clear wording of instructions, etc.),
- The computerized systems used for these documents may change in future revisions to keep up with current technology and
- The manner of collecting and storing information for these documents may change in future revisions.

Changes, such as those described above, which may be made to SOP-LAB-05-000020, STER-ASSESS-05-127360, Brookings SOP 81 Supplement R or SOP 82 Supplement R, will not affect the 12 commitments in Attachment 3 of our October 9, 2009 submission. No changes affecting those commitments will be made without prior U.S. NRC approval.

I hope you find this letter of explanation helpful. If you have any additional questions or comments, please contact Nick Bates (65-737-1019) of this office.

Sincerely,



Frederick B. Entwistle
Manager, 3M Corporate Health Physics

Enclosure: Attachment 3. License Commitments Regarding the Processing of Flammable Formulations in S8 & S10

Attachment 3

License Commitments Regarding the Processing of Flammable Formulations in S8 & S10

These commitments pertain equally to S8 & S10

Commitment #1: New worst-case formulations require a license amendment prior to irradiation.

Commitment #2: The volume of flammable liquid per individual article for any formulation will be restricted to a maximum value of 30 milliliters.

Commitment #3: The volume of flammable liquid per tote for any formulation will be restricted to the Small Quantity Volume of that formulation.

Commitment #4: The total flammable liquid in each box will be limited by the appropriate Packing Group (as specified in 49 CFR 173.121).

Commitment #5: All flammable formulations will be identified:

- existing formulations
- new formulations
- changed formulations in existing products
- changed quantities in existing product packages

Commitment #6: Small Quantity Volume calculations will be documented for every formulation:

- existing formulations
- new formulations
- changed formulations in existing products

Commitment #7: Small Quantity Volume calculation results will be reviewed and approved by the Brookings Site RSO prior to irradiation of any products containing flammable formulations.

Commitment #8: Lower Flammability Limit (LFL) values for every formulation will be obtained from testing using an independent laboratory:

- existing formulations
- new formulations
- changed formulations in existing products

Commitment #9: Documentation will be maintained for every irradiated formulation.

Commitment #10: Product and formulation-specific tote loading diagrams will be created to assure that no more than a Small Quantity Volume is placed in each tote.

Commitment #11: Written procedures will be maintained to implement Commitments #1 - #10.

Commitment #12: Evaluation of Commitments #1 - #11 will be done quarterly through audits performed by the Brookings RSO or by Corporate Health Physics. The audit will include verification of:

- adequacy of product-specific tote limitations to assure that no more than a Small Quantity Volume per tote is irradiated.
- adequacy of Small Quantity Volume calculation documentation
- adequacy of procedures to implement the commitments

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