



101 ARC Drive
Saint Louis, MO 63146 USA
Phone: 314-991-4545 or 800-331-6661
Fax: 314-991-4692 or 800-999-9925
Web: <http://www.arc-inc.com>
Email: arcinc@arc-inc.com

Friday, 2 July, 2010

Nuclear Materials licensing Section
U.S.Nuclear Regulatory Commission, Region III
2443 Warrenville Road, Suite 210
Lisle, IL 60532-4352

ATTN: George (Mike) McCann

Reference: License No. 24-21362-01

Dear Sir,

American Radiolabeled Chemicals, Inc (ARC) is replying to your Request For Additional Information as follows. The question is listed, followed by ARC's reply.

1. *Due to the poor detection sensitivity of carbon-14 in moist soil, and the non-detectability of hydrogen-3, confirm that any area greater than twice background will be further evaluated by collecting tests for removable contamination, and that these samples will be analyzed on-site prior to the release of the equipment.*

I confirm that that any area greater than twice background will be further evaluated by collecting tests for removable contamination by a wipe test with filter paper that will be counted on our LSC prior to the release of the excavating equipment.

2. *Confirm that tools and equipment, that come into direct contact with the soil are surveyed, such as shovels, tires and or treads of the excavating equipment, blades, and excavator's buckets are sampled by collecting wipes of an area not to exceed 1 square meter, (m^2) and if the area of the tool is less than one m^2 that the release criteria will be reduce proportionally to the .ratio of the area.*

I confirm that the tools and equipment that come into direct contact with the soil will be sampled by collecting wipes of an area that does not exceed 1 square meter, and if the tool is less than 1 square meter the release will be reduced proportionally to the ratio of the area.

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3. *Does ARC have a survey meter that will allow for an integrated count? If so, provide the count time necessary to achieve an MDC and count rate that would exceed the 5000 dpm DCGL specified in the SOP. A integrated count should be taken in the area of the wipe, if any value exceeds two times background.*

ARC does not currently have a meter that will allow for an integrated count therefore a stop watch will be used. The time necessary is a minimum of one time constant which is 23 seconds on the slow setting

4. *Confirm that periodic surveys of the equipment and personnel are performed. Also, discuss what actions will be taken in the event contamination significantly higher than the release limit is detected. What limit will initiate further evaluation and bioassay.*

If anything is over 1000dpm it will be cleaned and if that level is detected on an individual, they will be cleaned and a bioassay sample will be taken.

5. *Confirm that activities will be performed to mitigate dust and soil run-off.*

We confirm that any soil excavated will be placed on a tarp and covered whenever possible. The soil will also be kept damp enough to avoid dust from the excavated soil.

If any additional information is required, please contact our RSO, Regis A Greenwood, CHP. Directly.

Thank you for your attention in this matter.

Sincerely

A handwritten signature in black ink, appearing to read 'Surendra K Gupta'.

Surendra K Gupta, PhD
President,
American Radiolabeled Chemicals, Inc

CC: RSO
Radiation Safety Committee File



**American Radiolabeled
Chemicals, Inc.**

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