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November 4, 2010

FAX To:

Ms. Penny Lanzisera

*19-00296-10
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U.S. Nuclear Regulatory Commission
Region I
Fax # 610-337-5269

From:

Bob Zoon

Radiation Safety Officer
Division of Radiation Safety, ORS
National Institutes of Health

301-496-2254 (work)
FAX 301-496-3544
email:zoonr@ors.od.nih.gov

Subject: Documents in response to your email of November 2nd. With regard to the timetable for full access to the waste management systems, Doug has learned that July 2011 is probably the earliest that the NIH might accept Block B and that it may be longer.

Mail Control Number 573593

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**DEPARTMENT OF HEALTH & HUMAN SERVICES**

Public Health Service

National Institutes of Health
Bethesda, Maryland 20892www.nih.gov**NOV 03 2010**

Ms. Penny Lanzisera
Senior Health Physicist
Materials License and Inspection Branch
Region I
U.S. Nuclear Regulatory Commission
475 Allendale Road
King of Prussia, PA 19406-1415

RE: License No. 19-00296-10

Dear Ms. Lanzisera:

In accordance with your November 2 e-mail to Robert Zoon, NIH Radiation Safety Officer, please accept my concurrence with the requirements/conditions that were listed in the letter addressed to Doug Carter from Colonel Judith Robinson, Commander, USAG, Fort Detrick, Maryland, regarding the use of NRC licensed materials at the NIAID-IRF located at the USAG.

Sincerely,

A handwritten signature in black ink, appearing to read "Alfred C. Johnson", with a long horizontal flourish extending to the right.

Alfred C. Johnson, Ph.D.
Director, Office of Research Services

**DEPARTMENT OF HEALTH & HUMAN SERVICES**

Public Health Service

National Institutes of Health
Bethesda, Maryland 20892www.nih.gov**S.O.P. for USNRC Licensed Materials Usage During Temporary Exemption from Tank Sampling**

The Division of Radiation Safety [DRS] is committed to preventing radioactive material from getting into the Ft. Detrick sanitary sewer system from use of such material at the NIAID Integrated Research Facility [IRF], Fort Detrick, Maryland

The DRS will execute and oversee the actions to preclude the possibility of an inadvertent introduction of radioactive material (RAM) into the IRF's effluent handling system and the Ft. Detrick sanitary sewer system. These steps will include:

1. Plugging fume hood drains using mechanically actuated plugs that require a wrench or some other mechanical means to be defeated, and
2. Covering and/or sealing fume hood drains (using hazmat style emergency response covers specifically designed for this purpose) as a means of secondary containment, including warning signs informing lab workers of the drain's status and prohibiting its use.
3. Consulting with IRF Division of Occupational Health and Safety specialist and NIAID management to determine where it will be permissible to plug laboratory sink and floor drains (when applicable).
4. DRS and IRF management will provide oversight to limit RAM use to very specific areas where they are most easily controlled and monitored.
5. DRS and IRF management will provide oversight to ensure source material remains in the area in which it's intended to be used.
6. DRS and IRF management will provide oversight to prevent unauthorized personnel from accessing the RAM or any waste generated as a result of its use.
7. Radioactive waste will be collected in appropriate containers, after which it will be transferred to the Bldg. 21 radwaste processing facility on the main NIH campus.
8. Post-use contamination surveys will be performed on the test phantoms/equipment and in areas where the material is used to ensure there is no residual radioactivity that could inadvertently enter the sanitary sewer.

Note: A DRS Health Physicist [HP] is assigned full time to the IRF to provide oversight and ensure the proper receipt, use, security, and disposal operations. The IRF HP is backed up by senior HP's from the Radiation Safety Operations Branch, DRS as necessary to ensure that the oversight required for the above precautions is properly executed.

Approved November 4, 2010 by Robert A. Zoon, RSO, NIH