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Sanford Research USD
2301 East 60th Street North
Sioux Falls SD, 57104-0589

Roberto J. Torres
Senior Health Physicist
U.S. Nuclear Regulatory Commission - Region IV
Division of Nuclear Materials Safety
Nuclear Materials Safety Branch B
612 East Lamar Boulevard, Suite 400
Arlington, Texas 76011-4125

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MAR - 2 2011

DNMS

Date: 2, March 2011

RE: Request for written clarification on 1, March 2011

Dear Roberto J. Torres,

This letter is to confirm that Sanford Research/USD possession of unsealed radioactive material with half-lives exceeding 120 days will not exceed 1000 times the value listed in Appendix B of 10 CFR Part 30.

Additionally, Sanford Research/USD is committed to follow Appendix V of NUREG-1556, Volume 11 regarding its waste management procedures.

If you require further documentation, do not hesitate to contact us.

Regards,



David A. Pearce

Torres, RobertoJ

From: rmassoth@medx-ray.com
Sent: Wednesday, March 02, 2011 3:31 PM
To: Torres, RobertoJ
Cc: joseph.glasford@sanfordhealth.org; sharon.hoon@sanfordhealth.org; david.pearce@sanfordhealth.org; Traci Hollingshead
Subject: Fw: Question
Attachments: NRC Letter_3_2_11.pdf

Sent from my Verizon Wireless BlackBerry

-----Original Message-----

From: "Glasford, Joseph" <Joseph.Glasford@SanfordHealth.org>
Date: Wed, 2 Mar 2011 17:34:20
To: Richard J. Massoth <rmassoth@medx-ray.com>
Cc: Hoon, Sharon <Sharon.Hoon@SanfordHealth.org>; Pearce, David <David.Pearce@SanfordHealth.org>; Traci Hollingshead <thollingshead@medx-ray.com>
Subject: FW: Question

Morning Richard,

Attached is the requested letter.

Thank you,

-- Joe Glasford
Sanford Research/USD
2301 E 60 Street North
Sioux Falls, SD 57104
O 605 312 6083

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----- Forwarded Message

From: "Torres, RobertoJ" <RobertoJ.Torres@nrc.gov>
Date: Tue, 1 Mar 2011 16:30:16 -0600
To: "rmassoth@medx-ray.com" <rmassoth@medx-ray.com>
Cc: "Jenski, Laura J" <Laura.Jenski@usd.edu>, "Hoon, Sharon" <Sharon.Hoon@sanfordhealth.org>, "David.Pearce@SanfordHealth.org" <David.Pearce@SanfordHealth.org>, "Glasford, Joseph" <Joseph.Glasford@sanfordhealth.org>, Traci Hollingshead <thollingshead@medx-ray.com>
Subject: RE: Question

Since Sanford needs to submit a letter regarding waste disposal, have them add this confirmation to the letter:

1. Possession of unsealed radioactive material with half lives exceeding 120 days will not exceed 103 times the value listed in Appendix B of 10 CFR Part 30.

Thank you.

-----Original Message-----

From: rmassoth@medx-ray.com [mailto:rmassoth@medx-ray.com]

Sent: Tuesday, March 01, 2011 4:12 PM

To: Torres, RobertoJ

Cc: Jenski, Laura J; Hoon, Sharon; David.Pearce@SanfordHealth.org; 'Glasford ,Joseph'; Traci Hollingshead

Subject: Re: Question

Mr. Torres,

Following an inventory review, the possession of unsealed radioactive materials with half-lives exceeding 120 days does not exceed 1000 times the value listed in Appendix B of 10CFR30. It is not anticipated that such usage would be requested in the near future, and is not needed in the license split. We request proceeding with the restriction (license condition) that financial assurance for decommissioning will not be filed for the split.

Please advise if you need further assurances in this matter or any other questions you may have with regard to our license splitting application.

Sincerely,

Richard

Richard J Massoth, Ph.D.

Sent from my Verizon Wireless BlackBerry

-----Original Message-----

From: "Torres, RobertoJ" <RobertoJ.Torres@nrc.gov>

Date: Tue, 1 Mar 2011 10:49:01

To: Richard Massoth <rmassoth@medx-ray.com>

Cc: Jenski, Laura J <Laura.Jenski@usd.edu>; Hoon, Sharon <Sharon.Hoon@sanfordhealth.org>;

David.Pearce@SanfordHealth.org <David.Pearce@SanfordHealth.org>;

'Glasford ,Joseph' <Joseph.Glasford@sanfordhealth.org>; Traci Hollingshead <thollingshead@medx-ray.com>

Subject: RE: Question

I-125 has a 60 day half life. Financial assurance documentation is needed for material having half life greater than 120 days AND exceeding the thresholds of 10 CFR 30.35(d). I-125 does not count for financial assurance.

If all the radionuclides that are going to be used at Sanford/USD are below the 120 days half life then no financial assurance is needed.

-----Original Message-----

From: Richard Massoth [<mailto:rmassoth@medx-ray.com>]

Sent: Tuesday, March 01, 2011 10:41 AM

To: Torres, RobertoJ

Cc: Jenski, Laura J; Hoon, Sharon; David.Pearce@SanfordHealth.org; 'Glasford ,Joseph'; Traci Hollingshead

Subject: Re: Question

Mr. Torres,

Sanford Research/USD is a separate 503(c)(3) legal entity. It has its own Tax ID as a nonprofit corporation. Its operating budget is too large to fall under the "small" categories for licensing purposes.

We are working on an answer to the financial assurance letter of intent. We have only one radioisotope that comes close to exceeding the "below financial assurance" limit at this time, and that is I-125. We'll try to get you an answer today if possible, or before COB Wednesday, 3/2/11.

We would prefer NOT to void the new license application.

Thank you for your patience.

Take care,
Richard
Richard J. Massoth, Ph.D.

-----Original Message-----

From: "Torres, RobertoJ" <RobertoJ.Torres@nrc.gov>

To: Richard Massoth <rmassoth@medx-ray.com>

Cc: "laura.jenski@usd.edu" <laura.jenski@usd.edu>

Date: Tue, 1 Mar 2011 10:20:11 -0600

Subject: Question

> Please provide an answer to this question.

>

>

>

> 1. Is Sanford Research/USD (2301 East 60th Street, Sioux Falls, SD)

> part of the University of South Dakota or is it a separate legal

> entity?

>

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