



UNITED STATES  
**NUCLEAR REGULATORY COMMISSION**  
REGION I  
475 ALLENDALE ROAD  
KING OF PRUSSIA, PENNSYLVANIA 19406-1415

April 20, 2011

Docket No. 04006394  
Control No. 574699

License No. SMB-141

Pamela E. Fry  
Experimentation Support Manager  
Department of the Army  
US Army Research, Development and Engineering Command  
Army Research Laboratory  
Aberdeen Proving Ground, MD 21005-5067

**SUBJECT:** DEPARTMENT OF THE ARMY, REQUEST FOR ADDITIONAL INFORMATION  
CONCERNING APPLICATION FOR RENEWAL OF LICENSE, CONTROL NO.  
574699

Dear Ms. Fry:

This is in reference to your application dated March 14, 2011 requesting to renew Nuclear Regulatory Commission License No. SMB-141. In order to continue our review, we need the following additional information:

1. 10 CFR 40.36 requires that licensees authorized to possess and use unsealed licensed material with more than 100 mCi of source material in a readily dispersible form shall submit a decommissioning funding plan (DFP) in any new or renewal application. This plan must include an actual estimate of the costs for decommissioning your facility and a description of the methods of assuring funds in accordance with 10 CFR 40.36(d). The appropriate level of detail for the cost estimate is discussed in Appendix A.3 to Volume 3 of NUREG-1757, "Consolidated NMSS Decommissioning Guidance." If the DFP cost estimate is greater than your current certification of financial assurance, you must submit a revised financial assurance instrument in the prescribed amount of the cost estimate. Please follow closely the recommended wording for financial assurance mechanisms found Appendix A to Volume 3 of NUREG-1757.
2. Describe the criteria your Radiation Safety Committee (RSC) will use to approve authorized users for activities utilizing licensed material. These criteria should specify the minimum acceptable standards for training and experience of the users. Your application must provide sufficient detail to assure that the RSC evaluations are sufficient in scope and depth to satisfy 10 CFR 33.13(c)(3).
3. Your application did not address procedures for survey meter calibration. As written in NUREG-1556, Volume 7, please state, "We will use instruments that meet the radiation monitoring instrument specifications published in Appendix M to NUREG - 1556, Vol. 7, 'Program-Specific Guidance About Academic, Research and Development, and Other Laboratory Licenses of Limited Scope,' dated December 1999. We reserve the right to upgrade our survey instruments as necessary." OR "We will use instruments that meet

the radiation monitoring instrument specifications published in Appendix M to NUREG - 1556, Vol. 7, 'Program-Specific Guidance About Academic, Research and Development, and Other Licenses of Limited Scope,' dated December 1999. Additionally, we will implement the model survey meter calibration program published in Appendix M to NUREG - 1556, Vol. 7, 'Program-Specific Guidance About Academic, Research and Development, and Other Licenses of Limited Scope,' dated December 1999. We reserve the right to upgrade our survey instruments as necessary." OR Procedures for ensuring proper calibration and calibration frequency of survey equipment will be performed. Further, the statement "We reserve the right to upgrade our survey instruments as necessary" should be added to the response.

4. Describe your licensed material inventory, control and accountability program. Your inventory and control system should have the capability to assure that licensed material possession limits are not exceeded and that material is accountable throughout the institution at any given time.
5. You did not provide a description of your routine survey program. You may state, "We will survey our facility and maintain contamination levels in accordance with the survey frequencies and contamination levels published in Appendix Q to NUREG - 1556, Vol. 7, 'Program-Specific Guidance About Academic, Research and Development, and Other Licenses of Limited Scope,' dated December 1999", as written in NUREG-1556, Vol. 7. Alternatively you may provide a more complete description of the routine survey program, including the areas to be surveyed, the types and levels of radiation and contamination considered to be acceptable, and provisions for maintaining records of surveys. The individual user should supplement the surveys performed by the radiation staff. Regularly used laboratories should be surveyed for contamination at the end of each workday (except when quantities less than those in Appendix C to 10 CFR Part 20 are handled by an employee at any one time), and the user should maintain records of each surveys in units required by 10 CFR Part 20, even if only a single measurement is necessary.
6. As stated in NUREG-1556, Vol. 7, please provide diagrams of your facility. Please provide the layout of your facility especially showing ventilation and air flow in your decontamination facility.

Current NRC regulations and guidance are included on the NRC's website at [www.nrc.gov](http://www.nrc.gov); select **Nuclear Materials; Medical, Academic, and Industrial Uses of Nuclear Material**; then **Regulations, Guidance, and Communications**. You may also obtain these documents by contacting the Government Printing Office (GPO) toll-free at 1-866-512-1800. The GPO is open from 7:00 a.m. to 6:30 p.m. EST, Monday through Friday (except Federal holidays).

We will continue our review upon receipt of this information. Please reply to my attention at the Region I Office and refer to Mail Control No. 574699. If you have any technical questions regarding this deficiency letter, please call me at (610) 337-5366.

P. Fry

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In order to continue prompt review of your application, we request that you submit your response to this letter within 30 calendar days from the date of this letter.

Sincerely,

***Original signed by Dennis R. Lawyer***

Dennis R. Lawyer  
Health Physicist  
Commercial and R&D Branch  
Division of Nuclear Materials Safety

cc:  
Richard Markland, Radiation Safety Officer

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**SUNSI Review Complete: DLawyer**

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