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JUL 29 2011

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U.S. Nuclear Regulatory Commission
Attention: Dennis R. Lawyer
Division of Nuclear Materials Safety, Region I
475 Allendale Road
King of Prussia, PA 19406

Subject: License Renewal/Application (License No. 45-25551-01), Docket No. 030-35668, Control No. ~~144342~~ 574678

Per the NRC request in the memorandum dated June 29, 2011 the additional information is being provided to assist in your review of DTRA's NRC license renewal application. The attached document contains the NRC Request Statement and DTRA's corresponding answer.

We welcome the opportunity to meet and discuss any aspects of the application. Our point of contact is Mr. Michael Hinton, who can be reached at (703) 767-0295/5852.

Sincerely,

Sherry J. Davis

Sherry J. Davis
Chief, Environment, Safety and
Occupational Health Division
(703) 767-7122

Enclosures:
As stated

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NMSS/RGN1 MATERIALS-002

NRC Request 1: In item 5 of your application, you requested certain radioactive isotopes. Item AL was requested to not exceed 60 millicuries per source. Currently your license maximum is 44 millicuries per source and the maximum activity in the sealed source and device registry is 44 millicuries per source for that model number. Please change the request to 44 millicuries per source or provide additional information that would allow the higher activity for the source.

DTRA Response: Concur; Item AL should remain at 44 millicuries per source.

NRC Request 2: In item 5 of your application, you requested for authorization of unsealed materials. However the rest of your application did not support the use of unsealed materials. Specifically, authorized users must be named and supported by the qualifications of those authorized users. Please see section 8.7.2 of NUREG 1556, Volume 7, "Consolidated Guidance About Materials Licenses, Program-Specific Guidance About Academic Research and Development, and Other Licenses of Limited Scope." Please submit name of proposed authorized users along with their education and experience using unsealed materials. In item 8 you did not submit a training program for users that contained the additional elements that would be expected in a program using unsealed materials. If the use of unsealed materials is isolated to a particular location, please designate that location so that training could still be used to authorize users for sealed materials. Please submit additional attributes of training for users of unsealed materials. You may wish to review the items in Appendix J of NUREG-1556, Volume 7.

DTRA Response: We have reviewed section 8.7.2 of NUREG 1556, Volume 7, "Consolidated Guidance About Materials Licenses, Program-Specific Guidance About Academic Research and Development, and Other Licenses of Limited Scope" and "Appendix J of NUREG-1556, Volume 7" and in the interest of time, we are requesting this section be removed from our renewal application. Under separate correspondence DTRA will submit an amendment request to demonstrate our ability to meet the aforementioned statement, for the use of unsealed radioactive material.

NRC Request 3: In item 10.3.1 of your application, you specified the frequency of an inventory of at least annually. The guidance in NUREG-1556, Volume 7 section 8.10.3 is that inventories are performed at intervals not to exceed 6 months. Please commit to performing inventories at least every 6 months or submit additional justification why a less frequent inventory maintains the same level of material accountability.

DTRA Response: Concur. Recommend the statement be modified to read" The DTRA RSO or designated representative will complete and document an inventory of radioactive materials at six-month intervals as described in NUREG-1556, Volume 7 section 8.10.3.
Rationale: DTRA operates world-wide at temporary job sites, in some situations the DTRA RSO

will need to assign the inventory responsibility to a qualified Authorized User to meet license conditions.

NRC Request 4: In item 10.4 of your application, you specified that you will monitor individual in accordance with "Radiation Safety Program-Occupational Dose" in Appendix 0 of NUREG-1556, Volume 7. There is no Radiation Safety Program-Occupational Dose in Appendix 0, which discusses public doses. Please submit the following statement, "We have done a prospective evaluation and determined that unmonitored individuals are not likely to receive, in one year, a radiation dose in excess of 10% of the allowable limits in 10 CFR Part 20 or we will monitor individuals in accordance with the criteria in the section entitled 'Radiation Safety Program - Occupational Dose' in NUREG - 1556, Vol. 7, 'Consolidated Guidance about Materials Licenses: Program-Specific Guidance about Academic, Research and Development and Other Licenses of Limited Scope,'" dated December 1999." OR A description of an alternate method for demonstrating compliance with the referenced regulations. This is based on the guidance given in NUREG-1556, Volume 7 in section 8. 10.4.

DTRA Response: Concur. Please remove the reference to "Appendix O" in item 10.4 of the application and insert the following statement:

"We have done a prospective evaluation and determined that unmonitored individuals are not likely to receive, in one year, a radiation dose in excess of 10% of the allowable limits in 10 CFR Part 20 or we will monitor individuals in accordance with the criteria in the Section entitled 'Radiation Safety Program - Occupational Dose' in NUREG - 1556, Vol. 7, 'Consolidated Guidance about Materials Licenses: Program-Specific Guidance about Academic, Research and Development and Other Licenses of Limited Scope,'" dated December 1999."