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August 23, 2011

Mr. Steve Courtemanche
U.S. Nuclear Regulatory Commission
Region 1
DNMS
475 Allendale Road
King of Prussia, PA 19406-1415

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Subject: Response to Request for Additional Information Concerning Application for Amendment to License Control Nos 575555, 5755556, 5755557, and 5755558.

Dear Mr. Courtemanche,

03003852 03036765
Thank you for your review of our amendment request dated July 6, 2011 to terminate License Nos 07-00455-02, 07-0455-41, and 07-00455-27 and to consolidate these programs and materials under License No 07-13441-02. 03020681 03003859

In response to your letter dated July 25, 2011, we are providing the additional information you have requested for your review and consideration.

1. License No. 07-00455-27 currently authorizes temporary job sites. We would like to include this authorization as part of the license consolidation under License No. 07-13441-02.
2. Our request for nickel 63 in Section 7 should read "Foil or plated sources registered with either the U.S. Nuclear Regulatory Commission under 10 CFR 32.210 or with an Agreement State." We have included below the manufacturer's name and model numbers of the sealed sources containing nickel 63 that are to be specifically licensed.

Manufacturer Name: Agilent
Model Number: 2397A

3. License No. 07-00455-02 currently authorizes, in part, the incineration of waste received from NRC License No. 07-13441-02 and NRC License No. 07-00455-40. NRC License No. 07-00455-40 was terminated in 2003. We request that the authorization for waste incineration operations currently covered under License No. 07-00455-02 be applied to the amendment request to consolidate these operations under License No. 07-13441-02 and that the authorization continue to allow for the incineration of waste generated from both the DuPont Experimental Station, Wilmington, DE (current NRC License No. 07-00455-02) and the DuPont Stine-Haskell Research Center, Newark, DE (current NRC License No. 07-13441-02).
4. We believe the wording in Line item number 15 in License No. 07-00455-02 has led to interpretation that nickel 63 is used in animal studies. Nickel 63 is only present in foil or plated sealed source form and is not used in animal studies. Additional information regarding the form and amounts of nickel 63 can be found in inquiry response number two.

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5. Although chlorine 36 and chromium 51 are listed in section 6, 7, and 8 in License No. 07-13441-02, these materials have never been acquired or used under this license. These materials were added to License No. 07-13441-02 for anticipated research efforts, however, this work never occurred. This was confirmed with a previous Radiation Safety Officer, Norman W. Henry, who was RSO at the time of the amendment request to add these materials to the License No. 07-13441-02.
6. Due to the small number of sealed radioactive source material and small number of users of this material, the training described in the application dated March 27, 2001 for License No. 07-00455-27 will continue to apply. The Radiation Safety Officer will still maintain responsibility for authorizing these users.
7. Due to the small number of sealed source radioactive material users under License No. 07-00455-27 (DuPont Chestnut Run Laboratories), our intent is to have the Radiation Safety Officer serve as the representative for the users and operations at the DuPont Chestnut Run Laboratories on the combined Radiation Safety Committee for the consolidated radioactive materials license under License No. 07-13441-02.
8. With regard to the Self Guarantee and Certification of Financial Assurance, we have contacted our Legal Department to address items 8a, 8b, and 8e.
 - a. References to license numbers, docket numbers, and mail control numbers will be removed.
 - b. Facilities located at the DuPont Experimental Station in Wilmington, Delaware (07-00455-02), DuPont Chestnut Run Plaza in Wilmington, Delaware (07-00455-27) will be added to the Self Guarantee and Certification of Financial Assurance document for the DuPont Stine-Haskell Research Center (07-13441-02).
 - e. Our Legal Department will issue a new Self Guarantee and Certification of Financial Assurance document to address the items noted above.

With regard to the decommissioning funding plan, items 8c and 8d, the small number of radioactive material use areas at the DuPont Experimental Station (07-00455-02) to be incorporated into the DuPont Stine-Haskell Research Center license (07-13441-02) is essentially equivalent to the number of radioactive material use areas that have been decommissioned under the latter license. We anticipate no major changes to the DuPont Stine-Haskell Research Center decommissioning funding plan. The DuPont Stine-Haskell Research Center license (07-13441-02) is due for renewal in March 2012. A new decommissioning funding plan will be submitted with the license renewal application at that time.

Please feel free to contact either Mr. John Brisbin, DuPont Wilmington Area Radiation Safety Officer, at 302-695-6896 or Mr. Michael Ohm, DuPont Wilmington Area Assistant Radiation Safety Officer, at 856-540-2676, if you have any questions or require additional information.

Sincerely,



Maurice R. Richard
DuPont Site Facilities Manager

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Newark, DE 19714-0030