

**From:** Gaskins, Farrah  
**Sent:** Tuesday, September 20, 2011 8:03 AM  
**To:** richard.w.lamoreaux@us.army.mil  
**Subject:** Request for additional information

Dear Lamareaux:

This is in reference to your application dated June 20, 2011 requesting to renew Nuclear Regulatory Commission License No. SUB-348. In order to continue our review, we need the following additional information:

1. Describe the criteria your Ionizing Radiation Control Committee (IRCC) will use to approve authorized users and uses for activities utilizing licensed material. These criteria should specify the minimum acceptable standards for training and experience of the users, facilities and equipment, the operating or handling procedures, the types of surveys or monitoring and the survey frequency requirements. Your application must provide sufficient detail to assure that the IRCC evaluations are sufficient in scope and depth to satisfy 10 CFR 33.13(c)(3).
2. In your application, you describe the training you would provide to users of radioactive materials as well as emergency personnel, but not for ancillary staff (maintenance, janitorial, and administrative staff). Describe the training program for ancillary personnel the training given should be commensurate with the duties and responsibilities of the group. The training program must assure that personnel are instructed before assuming duties in the vicinity of licensed materials and specify a frequency for periodic refresher training. Appendix J of NUREG-1556, Volume 7 addresses radiation safety training topics and may be helpful in developing your response.
3. In Section 9.4 of your application, it states that other buildings and facilities may be used if approved by the IRCC without requiring amendment to the license. Describe the criteria your IRCC will use to review and approve facilities (research laboratories, waste storage facilities). Your description will need to include your method of classifying laboratories based on type, toxicity and quantity of material being requested. Sample diagrams or descriptions should be provided for each classification scheme that takes into consideration shielding, the proximity of radiation sources to unrestricted areas and other items related to radiation safety. When reviewing facilities where radioactive materials may become airborne, sample diagrams descriptions should take into consideration descriptions of the ventilation systems including pertinent airflow rates, pressures, filtration equipment and monitoring systems. For special application facilities, (such as DU machining facilities or waste processing facilities) you will need to specify their locations (i.e. buildings and room numbers) and special considerations that your IRCC will use in authorizing use. Also describe your procedures for control, review, and approval of significant facility modifications.

Current NRC regulations and guidance are included on the NRC's website at [www.nrc.gov](http://www.nrc.gov); select **Nuclear Materials; Med, Ind, & Academic Uses**; then **Licensee Toolkits**, see our **toolkit index page**. 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. 575463 by fax (610-337-5269) or mail. E-mail responses are not accepted at this time. If you have any technical questions regarding this deficiency letter, please call me at (610) 337-5143.

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.

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