

From: Crmidmr@aol.com
Sent: Tuesday, April 24, 2012 11:49 PM
To: Modes, Kathy
Subject: Re: Request for additional information

The limit for Sr-90, is intended to allow me to transport radiation sources for disposal, i.e. from the facility, to my facility so that I may repackage it, and then ship off for disposal. The maximum time limit would be less than 5 days that the sources would be in my personal possession. All would have a current leak test prior to the disposal process. Since all of these sources require prepayment for disposal, one could argue that financial assurance is already setup when the facilities decide to dispose of the Sr-90 sources.

If the above procedure is going to be a problem, then reduce my limit down to 0.2 uCi for Sr-90 which is the only Sr-90 source that I own.

In a message dated 4/24/2012 3:33:29 P.M. Atlantic Standard Time, Kathy.Modes@nrc.gov writes:

Licensee Name: CRMI

License No.: 52-25430-01

Docket No.: 030-34704

Mail Control No.: 577402

Dear Mr. Rhoe,

It has come to our attention that the way your license (Items 6-8A) is currently written, requires financial assurance.

Items 6.A, 7.A, and 8.A list: any byproduct material with atomic numbers 1 through 83, analytical samples, 1 millicurie.

Based on NUREG-1757 Volume 3 or Appendix G of NUREG-1556 Volume 7 – you would need to provide financial assurance if you possess greater than 100 microcuries of strontium-90, iodine-129 or any unknown mixture of beta emitters.

You can either (a) lower the possession limit to not require financial assurance or (b) commit to a running inventory system that will show how much licensed

material by isotope and activity you possess and adding the financial assurance limiting condition to your license or (c) submit financial assurance following the guidance in NUREG-1575 Volume 3.

This possession limit is for leak test samples. Do you think you could reduce the possession limit to say 100 microcuries total?

Current NRC regulations and guidance are included on the NRC's website at 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 8:00 a.m. to 5:30 p.m. EST, Monday through Friday (except Federal holidays).

Please reply within the next 30 days to my attention at the Region I Office and refer to Mail Control No. 577402. If you have any technical questions regarding this deficiency letter, please call me at (610) 337-5251.

Please note that the Region I Division of Nuclear Materials Safety will be moving effective May 9, 2012. Our new address will be:

USNRC – Region I
2100 Renaissance Blvd, Suite 100
King of Prussia, PA 19406-2713

Thank you for your continued cooperation.

Kathy Modes

Sr. Health Physicist

Decommissioning Branch

US NRC Region I DNMS

phone: 610-337-5251

fax: 610-337-5269

email: kathy.modes@nrc.gov

*****IMPORTANT MESSAGE*****

The NRC Region I Office will be moving to a new building late April/early May 2012.

I will not have telephone service from April 20 - May 1, 2012.

Please email me during this time frame or call (610) 337-5239/5399.

 Please consider the environment before printing this e-mail.

=