UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION I
2100 RENAISSANCE BOULEVARD, SUITE 100
KING OF PRUSSIA, PENNSYLVANIA 19406-2713

May 25, 2012

Docket No. 030-11063 License No. 08-00386-19
Control No. 577439

Wayne Frederick, Sr., M.D.
Deputy Vice-Provost for Health Sciences
Howard University
6th and Bryant Streets NW
Radiation Safety, Annex II - Room 211
Washington, DC 20059

SUBJECT: HOWARD UNIVERSITY, REQUEST FOR ADDITIONAL INFORMATION CONCERNING APPLICATION FOR AMENDMENT TO LICENSE, CONTROL NO. 577439

Dear Dr. Frederick:

This is in reference to your letter dated April 26, 2012 requesting to amend Nuclear Regulatory Commission License No. 08-00386-19. In order to continue our review, we need the following additional information:

1. The information you provided as a basis for release of the Building 510 basement waste storage facility is incomplete. The NRC criteria for release of a facility for unrestricted use must meet the License Termination Criteria in subpart E of 10 CFR Part 20. Guidance for meeting these criteria may be found in NUREG-1757, "Consolidated Decommissioning Guidance" (NUREG-1757) on the NRC website at http://www.nrc.gov/reading-rm/doc-collections/nuregs/staff/sr1757/. You may be able to use the Alternate Simplified Method in NUREG-1757, Volume 2, Appendix B, to demonstrate compliance with Subpart E. In particular, be sure to address the following:

    a. Provide a description of the facility, including items such as dimensions; type of flooring and wall surfaces; sinks, drains and other permanent fixtures; any remaining equipment associated with radiation safety such as hoods or other containment or ventilation systems.

    b. Provide a brief history of the use of this facility. Be sure to include when use of the facility began; the types, forms, and quantities of radionuclides used or stored here; and any activities such as packaging, compacting, sewer disposal, etc.

    c. Release surveys must address both total residual contamination, and removable residual contamination. The Alternate Simplified Method requires a minimum of 30 such sample points. Sample points should include floor and wall surfaces. The removable contamination survey performed by your contractor shows only 20 sample points, all on floor or table surfaces. There does not appear to be any static measurements of total residual contamination by the contractor.

d. The Alternate Simplified Method requires a 100% scan survey of the facility. There does not appear to be a radiation scan of the facility by the contractor.

e. The Close Out Surveys included in the amendment request appear to be performed by the Radiation Safety staff. These surveys include removable contamination surveys assessed by liquid scintillation and gamma counting methods, and ambient radiation level surveys. These surveys do not appear to include static measurements for total residual contamination or scan surveys of all surfaces.

2. Provide survey results for any permanent fixtures such as drains, hoods, ductwork, vacuum systems, etc that could have residual contamination from activities in the Building 510 basement waste storage facility. Based on a review of our inspection records, it appears that a Hot Sink was located in one of your waste facilities for disposal of liquids into the sanitary sewerage system.

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).

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. 577439. If you have any technical questions regarding this deficiency letter, please call me at (610) 337-5040.

If we do not receive a reply from you within 30 calendar days from the date of this letter, we will assume that you do not wish to pursue your application.

Sincerely,

Original signed by Elizabeth Ullrich

Betsy Ullrich
Senior Health Physicist
Commercial and R&D Branch
Division of Nuclear Materials Safety

cc:
Satya R. Bose, Ph.D., Radiation Safety Officer

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SUNSI Review Complete: EUllrich

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