



THE CATHOLIC UNIVERSITY OF AMERICA

*FACILITIES OPERATIONS
620 MICHIGAN AVE, NE
WASHINGTON, DC 20064
202-319-5500
FAX: 202-319-4446*

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June 18, 2012

Docket No. 07000190
License No. SNM-164
Mail Control No. 577385

Mr. Dennis Lawyer, CHP
USNRC – Region I
2100 Renaissance Blvd, Suite 100
King of Prussia, PA 19406-2713

Subject: NRC email dated May 31, 2012 requesting additional information for renewal of license No. SNM-164

Dear Mr. Lawyer:

This letter, with enclosures, responds to your email dated May 31, 2012 and provides the additional information requested. Our technical contact for this submittal continues to be Mr. Mahmoud Haleem, Radiation Safety Officer.

If you need further information you can reach Mr. M. Haleem, the RSO, at the following telephone number 202-319-5206 or/and email haleem@cua.edu.

Please note the correct email address for me is: conradj@cua.edu

Sincerely,

Mr. Jerry Conrad
Associate Vice President,
Facilities Operations

Cc: Mr. Louis Alar, Director, Environmental Health & Safety
Mr. Mahmoud Haleem, Radiation Safety Officer

Enclosure 1: Response to request for additional information
Enclosure 2: Radiation Safety Officer Delegation of Authority

577385
NMSS/RGN1 MATERIALS-002

Enclosure 1: SNM-164 License Renewal Application

Licensee's Response to Request for Additional Information:

1. On item 2 of your application, you specified a mailing address of Marist Annex, Room 237. Please confirm you wish to change the mailing address of your license.
 - CUA acknowledges variations of our license address. In order to correct this, CUA has verified our mailing address and submits the following, which eliminates building names:

The Catholic University of America
Department of Environmental Health and Safety
Radiation Safety Officer
620 Michigan Avenue, N.E.
Washington D.C. 20064
2. As required by 10 CFR 70.22, your license must contain a proposed decommissioning funding plan with a renewal application. Please submit a proposed decommissioning funding plan or state that your decommissioning funding plan dated February 2, 2010 is still valid and does not need revised.
 - The Decommissioning Funding Plan (DFP) dated February 2, 2010 is still valid and is not in need of revision as part of this renewal application. However, CUA acknowledges the three-year review cycle of the DFP and has scheduled to review and revise, if necessary, the DFP prior to February 2, 2013.
3. The Radiation Safety Manual described your Radiation Safety Committee (RSC). In NUREG-1556, Volume 11, "Consolidated Guide About Material Licenses, Program-Specific Guidance About Licenses of Broad Scope," section 8.7.2 states to submit the numbers of members constituting a quorum. Your application did not appear to contain this information. Please state the numbers of members is required for your Radiation Safety Committee to constitute a quorum.
 - A quorum will be established when there are a minimum of 4 members of the radiation safety committee present.
4. In NUREG-1556, Volume 11, "Consolidated Guide About Material Licenses, Program-Specific Guidance About Licenses of Broad Scope," section 8.7.3, it states to submit a Radiation Safety Officer (RSO) Delegation of Authority signed by the executive management. Your application did not appear to contain this document. Please submit a copy of the Radiation Safety Officer's Delegation of Authority signed by executive management.
 - A signed copy of the Radiation Safety Officer Delegation of Authority by the Associate Vice President for Facilities Operations is attached. The Radiation Safety Officer has been allocated the appropriate time and resources to fully implement all duties assigned as the Radiation Safety Officer for the Catholic University of America. (Enclosure 2)
5. In NUREG-1556, Volume 11, "Consolidated Guide About Material Licenses, Program-Specific Guidance About Licenses of Broad Scope," section 8.10.1, it states to describe the audit mechanism implemented by the RSO or other responsible individual to determine user compliance with NRC regulations, the terms and conditions of the NRC license, the

requirements of the RSC approved permits and good health physics practices. Your application did not appear to address this particular item. Please submit the audit mechanism implemented by the RSO or other responsible individual to determine user compliance with NRC regulations, the terms and conditions of the NRC license, the requirements of the RSC approved permits and good health physics practices.

- An annual audit/review of the radiation protection program is conducted by members of the Radiation Safety Committee in December of each year as required in 10 CFR 20.1101(c). The auditors prepare a written report to the Associate Vice President of Facilities Operations. The radiation safety program described in the application will meet the requirement cited in section 8.10.1 to determine user compliance with NRC regulations, the terms and conditions of the license, the requirements of the Radiation Safety Committee approved authorizations, and good health physics practices.
6. In NUREG-1556, Volume 11, "Consolidated Guide About Material Licenses, Program-Specific Guidance About Licenses of Broad Scope," section 8.10.2, it states to discuss how the RSC will assure instruments are properly calibrated at prescribed frequencies. Your application did say that you would be calibrated at an annual frequency, however it did not commit to performing the calibration at a NRC or Agreement State licensed facility authorized to instrument calibrations nor did the application submit any calibration procedures if calibration was to be performed on site. Licensees who want authorization to calibrate their own survey instruments may commit to implementing the model procedures published in Appendix O of NUREG-1556, Volume 11. Please state how the RSC will assure instruments are properly calibrated at prescribed frequencies, commit to using a NRC or Agreement state licensed facility authorized to perform instrument calibrations to perform calibrations on your instruments, and submit calibration procedures if you plan to calibrate instruments yourself.
- The radiation survey instruments are calibrated on an annual basis. CUA commits to using a NRC or Agreement state licensed facility authorized to perform instrument calibrations.
7. In NUREG-1556, Volume 11, "Consolidated Guide About Material Licenses, Program-Specific Guidance About Licenses of Broad Scope," section 8.10.7, it states to submit your leak test procedures or you may state, "we will implement the model leak test program published in Appendix T of NUREG-1556, Volume 11, 'Program-Specific Guidance About Licenses of Broad Scope.'" Your application did not appear to address leak test procedures. Please submit your leak test procedures or state, "we will implement the model leak test program published in Appendix T of NUREG-1556, Volume 11, 'Program-Specific Guidance About Licenses of Broad Scope.'"
- CUA will implement the model leak test program published in Appendix T of NUREG-1556, Volume 11; alternatively, CUA reserves the right to have leak test samples analyzed by an NRC or agreement state licensee authorized to perform leak test analysis.



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Mr. Dennis Lawyer, CHP
USNRC – Region I
2100 Renaissance Blvd, Suite 100
King of Prussia, PA 19406-2713

Dear Mr. Lawyer;

Mr. Mahmoud Haleem serves as the Radiation Safety Officer (RSO) for The Catholic University of America. Mr. Haleem has served in this capacity since September, 2005.

The Radiation Safety Officer has been allocated the appropriate time and resources to fully implement all duties assigned as the Radiation Safety Officer for the Catholic University of America. The RSO is audited annually by members of the Radiation Safety Committee who issue a formal report of their findings to my attention.

Please contact me if you have any questions or concerns regarding Mr. Haleem's authorization to serve as CUA's RSO.

Sincerely,

Mr. Jerry Conrad
Associate Vice President, Facilities Operations

Cc: Mr. Louis Alar, Director, Environmental Health & Safety
Mr. Mahmoud Haleem, Radiation Safety Officer (RSO)