

Aptuit, LLC  
10245 Hickman Mills Rd., Suite B-2  
Kansas City, MO 64137

July 26, 2012

**UNITED STATES NUCLEAR REGULATORY COMMISSION**  
REGION III  
2443 WARRENVILLE ROAD STE 210  
LISLE, ILLINOIS 60532-4352  
Attn: Decommissioning Branch  
Michael LaFranzo  
Lionel Rodriguez

Response: Updates for License No. 24-15595-01  
Mail Control number 577059

Dear Mr. LaFranzo:

This letter serves as Aptuit, LLC's follow up to the site visit of June 14, 2012 and the Trip Report posted July 10, 2012.

***Two Amendment Submittals***

Aptuit, LLC will continue to pursue two separate license amendments for the facility but offers the following as further clarification. The first amendment will cover the removal of the CTS laboratories (i.e. closure of Buildings A, E and existing CTS spaces in Building B) from the license. Those areas are no longer in operation and Aptuit has already completed the required Final Status Survey to demonstrate that these areas meet the criteria for free release. Answers to the NRC's remaining questions on the CTS Final Status Survey are included within this letter so Aptuit hopes this will allow NRC to review these areas and proceed with the license amendment.

The second amendment will cover the required activities associated with the remaining Aptuit, LLC site operations. The Decommissioning Plan (DP) will be required for the proposed activities in the Aptuit, LLC laboratories, contaminated ductwork, and the incinerator. All required information and documentation for these activities will be prepared and submitted separately from the CTS amendment discussed previously.

***CTS Final Status Survey***

Aptuit, LLC has completed its review of the Trip Report and would like to submit this document in support of closure of the CTS spaces, specifically Buildings A, E and the B laboratories associated with CTS activities and their removal as impacted areas from our license (see attached list from Table 1-1 of the CTS Final Status Survey Report). The Final Status surveys submitted in support of closure of these areas focused on areas where we expected to find contamination based on the findings of the HSA completed on November 21, 2011. Extensive characterization surveys were performed as well as a Final Status survey. With the exception of one discrete point in the class 2 survey of a walk in freezer, no contamination was found above the MDC of the survey instrument. This reading found in the B3-268F resulted in 1841 dpm/100 cm<sup>2</sup>. An equal sum of tritium is assumed to be present in addition to the

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measured value of carbon-14. Assuming these values cover one entire square meter grid and comparing them to the screening values in table B.1 of NUREG 1757 as well as the area covered by this document (3558.18 m<sup>2</sup>), respective TEDE values for tritium and carbon-14 would be 3.496E-6 mrem and 1.078E-7 mrem. Combined, these values result in a TEDE of 3.603e-6 mrem from the CTS laboratories.

During our discussion on June 14, 2012, inaccessible areas were one point the inspector felt that more information was needed. We have researched and verified that no sumps exist between the CTS laboratory drains and the pH treatment plant where monthly samples have been taken since January 2011 in order to screen the effluent water for radioactive contamination. No contamination has been detected to date. Laminate flooring has not been replaced since radio work was conducted in these laboratories except in areas where the laboratories have been completely reconstructed.

Based upon the above information, the type, form, quantity and limited usage of radioisotopes in non-synthesis areas, as well as the lack of evidence of residual contamination in the known use areas of CTS from the Final Status survey results, we do not feel that it is necessary to perform further investigation.

We are anticipating submission of the revised DP the week of August 20. We are currently renting the space to allow decommissioning and would appreciate any expediency that can be allotted for the review and approval of this DP. There will be a significant monetary impact if Aptuit is forced to extend their lease. Additionally, we would like to avoid having to perform the removal of the external exhaust systems in the winter months due to the safety risk of ice patches and snow expected during this period.

Please let me know if additional information is needed. I can be reached at (816)767-3745 or by cell at (816)769-4382.

Sincerely,



Clint Gregg

Radiation Safety Officer

Cc: Licensing Branch  
Kevin Null

**Table 1-1**

**Impacted Areas Within the CTS Facilities  
Final Status Survey Report  
Aptuit, LLC  
Kansas City, Missouri**

<b>A Building</b>
A3-320
A3-323
A3-324
A3-327
A3-340
A3-341
A3-348
A3-394
A3-302/303 (Dock 1)
A Mezzanine (A3-47)

<b>B Building</b>
B2-180
B2-181
B2-182
B2-189
B2-194
B2-195
B3-252*
B3-258
B3-268
B3-268 freezer
B3-270*
B3-274
B3-275 (cafeteria)
B3-295
B3-296
B3-297

<b>E Building</b>
E-205
E 208 (warehouse)
E-212
E-210
E-213
E-210

\*B3-current labs 252, 270 encompass former labs 250, 251, 252, 253B, 254, 255, 266, 267, 270, 272, 273 and 275.

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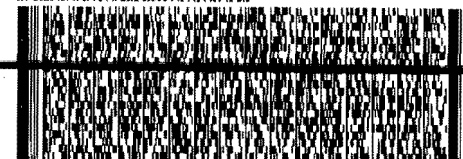
ORIGIN ID: OJCA (818) 767-3745  
CLINT GREGG  
APTLIT - DOCK 5  
10245 HICKMAN HILLS DRIVE  
KANSAS CITY, MO 641371418  
UNITED STATES US

SHIP DATE: 26JUL12  
ACTWGT: 0.2 LB  
CAD: 812617/CAFE2511

BILL SENDER

TO MATERIAL DECOMMISSIONING BRANCH  
US NUCLEAR REGULATORY COMMISSION  
REGION III  
2443 WARRENVILLE ROAD STE 210  
LISLE IL 605324352  
(630) 828-9809  
DEPT: API RADIOCHEMISTRY

ALL INFORMATION ON THIS LABEL IS SUBJECT TO THE TERMS AND CONDITIONS OF THE SERVICE CONTRACT



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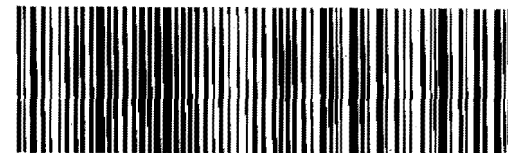
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