

From: [Ullrich, Elizabeth](mailto:Ullrich.Elizabeth)
To: kitchens.james@epa.gov
Subject: your renewal request
Date: Thursday, August 30, 2012 11:00:00 AM

License No. 10-10146-01
Docket No. 030-04004
Control No. 578000
USEPA Ecosystems Research Division

Mr. Kitchens,

1. The list of persons who will use, or supervise the use of, licensed materials listed in Item 10 of your application is different than the list of individuals in condition 11.A. of your current license.
 - Confirm if the names of Frank Stancil and Lee Wolfe should be removed from the license.
 - Provide information which demonstrates that Jim Bellah (additional information) and David Spidle are qualified to use, or supervise the use of, materials listed on the license. Such information should include, as a minimum, (I) describe the individual's on-the-job or formal training, including the location and duration of the training. Training should cover (a) principles and practices of radiation protection, (b) radioactivity measurements, standardization, and monitoring techniques and instruments (c) mathematics and calculations basic to the use and measurement of radioactivity, and (d) biological effects of radiation. (II) Describe the individual's use of licensed materials, including the specific radionuclides handled, the maximum quantities of materials handled, where the experience was gained, the duration of experience, and the type of use.
2. Confirm that radiation measurement and/or detection instruments will be calibrated at least annually.
3. Item 10 of your application contains a commitment to report leaking sources to the NRC at the Atlanta address. Please note that such reports should be to the NRC Region I office, at our new address listed below.
4. Item 10 of your application contains a reference to a 10 CFR 20.203(a)(1) requirement which no longer exists. The current citation is 10 CFR 20.1901, which contains the exception for etched labels.
5. You provided a copy of your Radiation Safety Procedure Manual dated July 2102. This document demonstrates that you have developed the procedures required by our guidance in NUREG-1556, Volume 7, "Program Specific Guidance About Academic, Research and development, and Other Licenses of Limited Scope", and is not required to be listed as a commitment on your license. If you request that this document be listed as a commitment, any changes to the document would require that the license be amended. If you decide that you want this document listed as a license commitment, you may request to make certain changes without

amendment by stating the following: "Procedures may be revised only if 1) the changes are reviewed and approved by the licensee management and the RSO in writing; 2) the licensee staff is provided training in the revised procedures prior to implementation; 3) the changed are in compliance with NRC regulations and the license; and 4) the changed do not degrade the effectiveness of the program."

- Section 8.1, Table 8-1 is titled "NRC acceptable package limits" and the footnote states that these limits are from 10 CFR 20.1906. Please note that this regulation refers only to procedures for receiving packages, and does not contain this list. Although 10 CFR 20.1906 references the definition of a Type A quantity as defined in 10 CFR 71.4, and Appendix A to Part 71, this list does not appear in those current regulations. No response to this item is required, unless you decide that the manual is a commitment to be listed on the license.

- the manual includes a form for requesting the use of animals in research. Confirm if you wish to be authorized to perform research in animals with licensed materials. If so, review NUREG-1556, Volume 7, Appendix H and confirm that you will develop procedures for using radioactive materials in animals.

6. The Energy Policy Act of 2005 required the NRC to regulate materials produced in accelerators, discrete sources of naturally-occurring radioactive materials, and discrete sources of radium. If you possess such materials that need to be listed on your license, please submit the additional information regarding the radionuclides, type, form, and quantity to be authorized.

You may not respond by email, you must respond in writing with a signed document, although a facsimile or pdf may be submitted.

Also, note that the office of the Region I Division of Nuclear Materials Safety has moved effective May 9, 2012. Our new address is:

U. S. Nuclear Regulatory Commission
Region I
2100 Renaissance Blvd, Suite 100
King of Prussia, PA 19406-2713

In addition, the NRC's Safety Culture Policy Statement became effective in June 2011.

While a policy statement and not a regulation, it sets forth the agency's *expectations* for individuals and organizations to establish and maintain a positive safety culture. You can access the policy statement and supporting material that may benefit your organization on NRC's safety culture Web site at <http://www.nrc.gov/about-nrc/regulatory/enforcement/safety-culture.html>. We strongly encourage you to review this material and adapt it to your particular needs in order to develop and maintain a positive safety culture as you engage in NRC-regulated activities.

I will continue the review of your renewal application when the requested information is received. Please respond within 30 days; if you need additional time, please contact me.

Thanks,
Betsy

Betsy Ullrich, MS, CHP
Senior Health Physicist, RI
US NRC
2100 Renaissance Boulevard, Suite 100
King of Prussia, PA 19406
(610) 337-5040 (office)
(484) 919-8348 (NRC cell)
elizabeth.ullrich@nrc.gov