

Docket 70-7025, Application for a new special nuclear materials license, Revision 3.

Delete Section 9) as written and replace with the following:

9) Material Control and Accountability -- 10 CFR 74.11, 74.13, 74.15, 74.19

RPI performs material control and accountability tasks in conformance with NRC regulations contained in 10 CFR 74.11, 74.13, 74.15, and 74.19.

All radioactive sources, including special nuclear materials, are physically inventoried every three months, exceeding the condition of 10 CFR 74.19(c). Records of these inventories are maintained for the life of the license. Inventory frequency and procedure is dictated by the RPI Radiation Safety Manual. A specific written procedure for material control and accountability, as well as a material control and accountability plan, as specified under 10 CFR 74.19(b) and 74.34, are not required as the material possessed under this license does not exceed one effective kilogram of special nuclear material.

RPI regularly completes material balance reports, inventory reports, and transaction reports, and provides them to the Nuclear Materials Management and Safeguards System database, as specified in 10 CFR 74.13 and 74.15. Material balance reports are completed using an inventory period of July 1 through June 30, and are submitted within 30 days following the end of the inventory year.

The discovery of theft or attempted theft of special nuclear material, whether discovered through physical inventories specified above or through other means, will be reported to the NRC emergency operations center no more than one hour following the discovery, as required by 10 CFR 74.11.