



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

April 10, 2013

Docket Nos. 03000582
07000053
03006886

License Nos. 06-00183-03
SNM-52
06-00183-06

Control Nos. 580266
580257
580258

Benjamin Polak, Ph.D.
Yale University Provost
Yale University
Radiation Safety Section - OEHS
135 College Street, First Floor
New Haven, CT 06510-2411

SUBJECT: YALE UNIVERSITY, REQUEST FOR ADDITIONAL INFORMATION
CONCERNING APPLICATION FOR AMENDMENT TO LICENSE, CONTROL
NOS. 580266, 580257, AND 580258

Dear Dr. Polak:

This is in reference to your letter dated March 15, 2013 requesting to amend Nuclear Regulatory Commission License Nos. 06-00183-03, SNM-52, 06-00183-06, and 06-00183-06. In order to continue our review, we need the following additional information:

1. Your letter states that financial assurance has already been submitted in a letter dated October 26, 2012. In order to combine these licenses, the financial assurance needs to be accurate to what the amended license will require. Please submit updated financial assurance documents that would support the final amended license. This could be in the form of an updated Certificate of Financial assurance and Self-Guarantee. It is also noted that the Self-Guarantee amount was not increased by the prescribed amount for the special nuclear materials and only contained the prescribed value for the current broadscope byproduct materials along with an amount for the production of radioactive material using an accelerator license.
2. Your current financial assurance instrument does not include a Standby Trust Agreement. Please submit a Standby Trust Agreement to support your financial assurance. Please see NUREG-1757, Volume 3, "Consolidated NMSS Decommissioning Guidance - Financial Assurance, Recordkeeping, and Timeliness"
3. The new cobalt 57 source could not be located in the sealed source and device registry. I referred to the manufacturer's website and it appears the source manufacturer is RITVERC with a model number of MCo7.114 which is contained in the MCo7 Series. Please confirm this is the manufacturer and model number of the source you wish to be

licensed.

4. You have requested the addition of West Haven and Orange, Connecticut to your license. Currently your license allows "locations under the direct control of Yale University." There appears to be little constraint on your license locations as stated and the location is not well defined. Please provide the boundaries of your facilities. Alternately you may use the names of your University campuses to identify the locations of use instead of how it is currently described. Changing of the location names will need to be reflected in the financial assurance documents..
5. For the removal of the Radium 226 source (Item RR. on NRC License No. 06-00183-03), the leak test result submitted was not a recent leak test. Please submit a leak test within 6 months of shipment date of June 16, 2011 as required in License Condition No. 17.E. Alternately, provide a survey where the source was stored and packaged.
6. You have requested NRC License Condition 15.C. from NRC License No. SNM-52 to be included in the amended license. Please confirm that Yale University is creating or intends to create sealed sources. This condition is only needed for licensees that are creating sealed sources.

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 Nos. 580266, 580257, and 580258. If you have any technical questions regarding this deficiency letter, please call me at (610) 337-5366.

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.

B. Polak

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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 Dennis R. Lawyer

Dennis R. Lawyer
Health Physicist
Commercial and R&D Branch
Division of Nuclear Materials Safety

cc:

Tammy J. Stemen, C.H.P., Radiation Safety Officer

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