

From: [Lawyer, Dennis](mailto:Lawyer.Dennis)
To: "kthompson@psm.edu"
Subject: Ponce School of Medicine, Request for Additional Information Concerning Application for a License Amendment, Control 580756
Date: Thursday, May 23, 2013 8:36:00 AM

Dear Dr. Kenira Thompson:

This is in reference to your NRC Form 314 dated May 13, 2013, requesting for termination to Nuclear Regulatory Commission License No. 52-19547-01 and Docket No. 030-17845. In order to continue our review, we need the following additional information:

1. Prior to termination of a license, 10 CFR 30.35(g), 30.36(k)(4) and 30.51 require that you submit to the NRC certain records. Please submit the following records, or explain why such records are not applicable:
 - a. for unsealed materials with half-lives greater than 120 days, records for disposal made pursuant to 10 CFR 20.2002 (alternate disposal procedures, including burial authorized prior to January 28, 1981), 20.2003 (disposals to the sanitary sewerage system), 20.2004 (incineration of wastes), 20.2005 (disposal of specific wastes including liquid scintillation cocktail and animal tissue), and 20.2103(b)(4), evaluations of effluent releases and
 - b. records important for decommissioning as described in 30.35(g). Examples of such records include but are not limited to: records of contamination, identifying the radionuclides, quantities and concentrations; as-built drawings and modifications of structures and equipment in restricted areas and locations of inaccessible contamination such as buried pipes; a single list, updated at least every 2 years, of areas to which access is limited for the purpose of radiation protection (restricted areas); and records related to the provision of financial assurance.

These records also include the previously authorized location on the license located on University Avenue, Ponce, Puerto Rico. No license will be terminated until the required records are received by the NRC. Records may be transferred to the U.S. Nuclear Regulatory Commission, Region I, 2100 Renaissance Blvd, Suite 100, King of Prussia, PA 19406-2713.

2. Your license was authorized to possess many different isotopes of radionuclides. Please state the radionuclides and physical forms that were used at your present location authorized under the license (Urb. Industrial Reparada, B Street, Ponce By-Pass, Ponce, Puerto Rico).
3. The submitted survey did not have many of the attributes expected of a survey.
 - a. Please state the location of the survey
 - b. Please state the efficiency of the counting instrument for the three regions counted and the isotopes of concern.
 - c. If only tritium isotope was used, a wipe survey would be sufficient. However,

the simplified survey procedures specified in NUREG-1757, Volume 3 (<http://www.nrc.gov/reading-rm/doc-collections/nuregs/staff/sr1757/v1/sr1757v1r2.pdf>), "Consolidated Decommissioning Guidance, Decommissioning Process for Materials Licensees", page 8-2, require 100% scan of the area for any other isotope of concern. Please perform appropriate survey scans or state that only tritium was used in this facility.

4. Please confirm that licensed material was not used in any other locations than the room that was submitted.
5. The NRC Form 314 was not completely filled out. Please submit where all future correspondence regarding this license should be sent.
6. On the NRC Form 314, it was submitted that radioactive materials were disposed by transfer to a waste contractor, NRC License No. 24-20091-01. This licensee is authorized to possess sealed sources, wipe tests, and environmental samples. Please state how your unsealed licensed materials and solid waste from the unsealed licensed material were disposed. Please submit records supporting methods of disposal or transfer.

We will continue our review upon receipt of this information. Please reply to my attention at the Region 1 Office and refer to Mail Control No. 580756. If you have technical questions regarding this 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.

Please note that you may not reply to this letter by return e-mail. Your reply must be in writing by letter or facsimile (610-337-5269). If we do not receive a reply from you within 30 calendar days from the date of this e-mail, we will assume that you do not wish to pursue your application.