



CONVERSATION RECORD

06/19/2013

NAME OF PERSON(S) CONTACTED OR IN CONTACT WITH YOU Brian J. Vetter, Radiation Safety Officer (RSO)		DATE OF CONTACT 06/18/2013	TYPE OF CONVERSATION <input type="checkbox"/> E-MAIL <input checked="" type="checkbox"/> TELEPHONE <input type="checkbox"/> INCOMING <input checked="" type="checkbox"/> OUTGOING
E-MAIL ADDRESS vette001@umn.edu		TELEPHONE NUMBER (612) 626-5247	

ORGANIZATION University of Minnesota	DOCKET NUMBER(S) 030-00842
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LICENSE NUMBER(S) 22-00187-46	CONTROL NUMBER(S) 579835
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SUBJECT
Our review of your license renewal application dated January 24, 2013

SUMMARY

We have reviewed your amendment request and find that we are unable to continue this action until we have received additional information outlined on pages 2-3 of this conversation record.

Direct any questions you have to me at (630) 829-9892 or sara.forster@nrc.gov.

Submit requested information within 17 days of this record, referencing Control No. 579835, as listed at the top of this memo. Please FAX your response to my attention at (630) 515-1078. You may also scan your response and send to me via email, as a pdf file. Include a signed and dated cover letter with your response.

As discussed, we expect to receive your written response on or before July 5, 2013.

Continue on Page 2

ACTION REQUIRED (IF ANY)

We have requested that the licensee provide additional information as follows:

- Research & Development Use including current vessel protocols and facility information, including diagrams
- Research Vessel Noodin closeout information
- Additional portable gauge sealed source information
- AU approval criteria and continuing training requirements
- Survey Instrument calibration procedures or commitments
- Incoming and Outgoing, including procurement and waste management, materials transfer procedures
- Safe Use, hazard evaluation, leak test, maintenance, operating, and emergency procedures and/or commitments
- Request for flexibility to revise procedures, and revision process, as needed

NAME OF PERSON DOCUMENTING CONVERSATION
Sara A.B. Forster, Materials Licensing Branch, Region III Office, 2443 Warrenville Road, Suite 210, Lisle, Illinois 60532

SIGNATURE
Sara A.B. Forster 06/19/2013

CONVERSATION RECORD (continued)

SUMMARY: (Continued from page 1)

B. Vetter

1. Please describe your current Research and Development use of unsealed radioisotopes. Confirm that all use is in vitro, or if there is also any human use, or other in vivo use. Attach copies of the most current experimental protocols, and other information indicated in Appendix I, p. I-1, of NUREG 1556, Volume 11, found at <http://www.nrc.gov/reading-rm/doc-collections/nuregs/staff/sr1556/v11/sr1556v11.pdf>, for the Research Vessel Lake Guardian, Research Vessel Laurentian, Research Vessel Blue Heron, and Research Vessel Lake Explorer II, as applicable.
2. In your application you indicated that the Research Vessel Noodin is no longer in use. Please submit closeout surveys and final materials disposition for this vessel. In the alternative, if no unsealed radioactive materials were used on the vessel, under NRC License No. 22-00187-06, please specifically state this. For all radioactive materials possession, use, and/or storage areas, include the following information with your response:
 - i. History of radioactive materials use, by isotope, for that area. Include the last date(s) on which the isotope was used, possessed, transferred, and disposed.
 - ii. Area survey and wipe test results for each area of use to be released as part of any location close-out, including exposure rates and wipe results, background readings, facility diagram with survey and wipes keyed to specific locations, name of person(s) performing closeout survey and wipe-test results, background readings, instrument(s) used, and the last calibration date for the instrument(s) used.
 - iii. Confirmation that all radioactive waste has been decayed to background radiation or has been transferred to a radioactive waste broker for disposal. For materials transferred or otherwise disposed of, provide the license number and contact information for each facility where the material was transferred. Attach receipt confirmation by the materials recipient.
3. For the cesium-137 (Cs-137) and americium-241 (Am-241) sealed source authorizations, indicate the manufacturer and model number for each source and/or device to be authorized. Include the total number of gauges that may be possessed and the activity per source and/or device. Include the specific purpose of use in gauging device (e.g. soil moisture/density testing, etc.) with your response.
4. For areas where unsealed materials are received, used, stored, and/or disposed on the ships/vessels, include a revised portable lab layout and/or facility diagram. The diagram should include room numbers, as applicable, and be drawn to a specified scale, or dimensions should otherwise be indicated. The diagram should be free of superfluous architectural markings. Identify any storage, fume hoods, waste, or other special use areas. Note any animal handling areas, such as bedding, housing, and other contamination control aspects of the facility. Finally, note access control to the lab and waste area and outline uses of rooms/corridors above, below, and adjacent to the portable lab and waste area. Refer to pp. 8-24 to 8-26 and Appendix L, pp. L-1 to L-2, of NUREG 1556, Vol. 11, and to Appendix H, pp. H-1 to H-2, of NUREG 1556, Vol. 7, found at <http://www.nrc.gov/reading-rm/doc-collections/nuregs/staff/sr1556/v7/sr1556v7.pdf>, for guidance on the facility information, including diagrams and animal handling, that should be included with your response, as applicable.
5. Note that Condition 12 will be revised to reflect that no human use of radioactive materials is allowed under the license. No written response is required for this item.
6. For All-University Radiation Protection Advisory Committee (AURPAC) approval of Authorized Users, etc., please indicate what is required for an individual's approval. For example, is a Bachelor's Degree or higher required? What other criteria are considered when determining which isotopes and what quantities of material an AU is authorized to receive, use, possess, or store?
7. Indicate how radiation safety training completion - both initial and refresher - is assessed. Include any exam requirements.
8. Regarding Survey Instruments, as indicated in our phone conversation, please confirm that calibration activities will be performed under the University of Minnesota Department of Health License, or other vendor licensed by NRC or an agreement state to perform instrument calibrations, as applicable. In the alternative, you may add the 10 Ci J.L. Shepherd Cs-137 source to your NRC license, and update your commitment to implement the model procedures published in NUREG 1556, Vol. 11, Appendix O.

Continue on Page 3

CONVERSATION RECORD (continued)

SUMMARY (Continued from page 2)

B. Vetter

9. Describe your administrative procedures to assure control of procurement and use of byproduct material. Provide a Material Receipt and Accountability Procedure as available. Address how adherence to the 49 CFR Part 71 Department of Transportation (DOT) requirements has been accomplished or will be implemented. As discussed in our conversation, describe how material is transported from your Minnesota Department of Health licensed facilities to the Research Vessel. Is it delivered to and left at the ship, or is someone available at the ship, whenever a package arrives? If a source is lost or stolen in transit, identify the responsible party, and at what points a lost source would be reported to NRC or to the Minnesota Department of Health.
10. The licensee must develop procedures for the Safe Use of Radionuclides, for the use of any unsealed materials. Attach a copy of such procedures. In the alternative, you may state, "We will adopt the procedures for the safe use of radionuclides and emergencies as published in NUREG 1556, Vol. 11, Appendix R."
11. The licensee also must develop survey, leak test, and waste management procedures in accordance with NUREG 1556, Vol. 11, NUREG 1556, Vol. 7, and/or NUREG 1556, Vol 1. Include copies of procedures for evaluating Radiological hazards, performing leak tests, and completing routine and non-routine portable gauge maintenance. In the alternative to providing procedures you may state:
 - i. For Radiological Hazard Evaluation: "We will survey our facility and maintain contamination levels and perform bioassays of occupationally exposed workers in accordance with the survey frequencies and contamination levels published in NUREG 1556, Vol. 11, Appendix S."
 - ii. For leak tests: "We will implement the model leak test program published in NUREG 1556, Vol. 11, Appendix T" and/or For portable gauge leak tests: "Leak tests will be performed at intervals approved by NRC or an Agreement State and specified in the Sealed Source and Device Registration Sheet. Leak tests will be performed by an organization authorized by NRC or an Agreement State to provide leak testing services for other licensees or using a leak test kit supplied by an organization."
 - iii. For Routine Portable Gauge Cleaning and Lubrication: "We will implement and maintain procedures for routine maintenance of our gauges according to each manufacturer's recommendations and instructions."
 - iv. For Non-routine Portable Gauge Maintenance: "We will send the gauge to the manufacturer or other person authorized by NRC or an Agreement State to perform non-routine maintenance or repair operations that require the removal of the source or source rod from the gauge."
12. For portable gauges authorized under the license, also include a statement: "We will implement and maintain the operating and emergency procedures in Appendix H of NUREG-1556, Vol. 1, Rev. 1, dated November 2001, and provide copies of these procedures to all gauge users and at each job site." or "Operating and emergency procedures will be developed, implemented, and maintained and will meet the criteria in the section entitled "Radiation Safety Program – Operating and Emergency Procedures" in NUREG-1556, Vol. 1, Rev. 1, dated November 2001."
13. As discussed, please provide a simple process description regarding how waste is collected and returned to your Minnesota Department of Health broadscope license, to add to the waste management information provided in the application.
14. For flexibility to revise submitted procedures without license amendment, discuss your processes for the revision and implementation of modified procedures.

Forster, Sara

From: Brian J Vetter <vette001@umn.edu>
Sent: Wednesday, July 03, 2013 3:49 PM
To: Forster, Sara
Cc: bryce armstrong
Subject: Re: Additional Information Request for University of Minnesota, NRC Lic. No. 22-00187-46, C/N 579835

Due to the holiday and reduced staffing, Sara we'll need more time to pull information together. We should be able to answer in full by Wednesday, July 10th.

Thanks - and enjoy your holiday, too.

bv

On 7/3/2013 3:41 PM, Forster, Sara wrote:

Hi Mr. Vetter:

I am just writing to follow up on the request for additional information. We are expecting a response by Friday, July 5, 2013. I have not seen one, to date.

Have a nice holiday. Thank you for your response to the request. Let me know if you have any questions or need additional clarification.

Sincerely,

Sara A. B. Forster, U.S. NRC, Region III office, (630) 829-9892

From: Brian J Vetter [<mailto:vette001@umn.edu>]
Sent: Thursday, June 20, 2013 1:32 PM
To: Forster, Sara
Subject: Re: Additional Information Request for University of Minnesota, NRC Lic. No. 22-00187-46, C/N 579835

Got it - thanks, Sarah.

bv

On 6/20/2013 11:19 AM, Forster, Sara wrote:

I apologize for that. Let me try again. Let me know if there are any problems.
- Sara Forster, (630) 829-9892

From: Brian J Vetter [mailto:vette001@umn.edu]
Sent: Thursday, June 20, 2013 9:55 AM
To: Forster, Sara
Subject: Re: Additional Information Request for University of Minnesota, NRC Lic. No. 22-00187-46, C/N 579835

No attachment came through, Sara - only the links to the Reg Guides.

bv

On 6/19/2013 4:09 PM, Forster, Sara wrote:

Dear Mr. Vetter:

Please see attached for additional information needed to complete the renewal of NRC Lic. No. 22-00187-46. Note that the application requests information as we discussed by phone, and as outlined in our guidance, found at:

NUREG 1556, Vol. 1, Rev. 1: <http://www.nrc.gov/reading-rm/doc-collections/nuregs/staff/sr1556/v1/r1/>

NUREG 1556, Vol. 7: <http://www.nrc.gov/reading-rm/doc-collections/nuregs/staff/sr1556/v7/>

NUREG 1556, Vol. 11: <http://www.nrc.gov/reading-rm/doc-collections/nuregs/staff/sr1556/v11/sr1556v11.pdf>

Sincerely,

Sara A. B. Forster, Health Physicist Licensing Reviewer

U.S. Nuclear Regulatory Commission - Region III

Division of Nuclear Materials Safety

2443 Warrenton Rd. - Ste. 210

Lisle, IL 60532-4352

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United States Nuclear Regulatory Commission

Protecting People and the Environment