



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

August 7, 2013

Docket No. 03014904
Control No. 581417

License No. 09-11149-03

Randall E. Scott
Radiation Safety Officer
National Aeronautics and Space Administration
John F. Kennedy Space Center
Mail code: TA-A4A
Kennedy Space Center, FL 32899

SUBJECT: NATIONAL AERONAUTICS AND SPACE ADMINISTRATION, REQUEST FOR
ADDITIONAL INFORMATION CONCERNING APPLICATION FOR RENEWAL
OF LICENSE, CONTROL NO. 581417

Dear Mr. Scott:

This is in reference to your application dated July 18, 2013 requesting to renew Nuclear Regulatory Commission License No. 09-11149-03. In order to continue our review, we need the following additional information:

1. You submitted the following manufacturer and model numbers which are not listed in the sealed source and device registry: Eckert & Ziegler Models EAB-LB, A-2, and AFSS-0010 and QSA Global Models VZ-1370 and VZ-3516. 10 CFR 30.32(g) lists the information and methods that sources can be listed on the license as a sealed source. Please provide the manufacturer and model number as listed in the sealed source and device registry or provide the additional information and category as stated in 10 CFR 30.32(g). Alternately, this material may be listed on the license under the form of "any".
2. Currently, you have Condition 13 on your license which limits the amount of materials possessed so that you are not required to provide decommissioning financial assurance. Please make a statement that you will maintain inventory and control procurement of licensed material such that you will restrict the amount of licensed material to quantities below the minimum limit specified in 10 CFR 30.35(d) for establishing decommissioning financial assurance. Alternately, please submit financial assurance as specified in 10 CFR 30.35(d).
3. NUREG-1556, Volume 11, "Consolidated Guidance About Material Licenses, Program-Specific Guidance About Licenses of Broad Scope," Section 8.7.2, Radiation Safety Committee states to provide the criteria used for selecting members of the Radiation Safety Committee (Radiation Protection Committee (RPC) in your application), including what members and the number of members that constitute a quorum. It did not appear your application included how members were selected, the criteria of selection, and what constitutes a quorum. Please provide the criteria used for selecting members of the

Radiation Safety Committee (Radiation Protection Committee in your application), including what members and the number of members constitutes a quorum.

4. In procedure KNPD 1810.11 in section 4. 2(i), it states that interim approval for the RPC subject to RPC ratification is made by the Radiation Protection Officer (RPO). In Attachment B section 5, it appears that the RPC Chairman may approve the use authorization package and not the committee. 10 CFR 33.13(c)(3)(iii) states that an application for a Type A specific license of broad scope will be approved if the application requires review, approval and recording by the radiation safety committee of safety evaluations of proposed uses prepared in accordance with paragraph (c)(3)(ii) of this section prior to use of the byproduct material. It would appear that your application authorized new users and new uses without the Radiation Protection Committee reviewing (excluding the chairman), and recording the approval. Please state that the Radiation Protection Committee with review, approve and record safety evaluations of proposed uses and new users prior to use of the byproduct material and that no one will give temporary approval or authorization without the approval of the Radiation Protection Committee.
5. Currently, Condition 24 authorizes greater flexibility to make program changes and changes to procedures that were previously approved by the Commission. If you wish to retain this condition you must request for it in the renewal application. NRC will provide even greater flexibility to Type A Broad Scope licensees to make programs changes and changes to procedures specifically identified in documents which were previously approved by the Commission and incorporated into the license, without prior Commission approval. If you would like authorization for this flexibility, please provide the following statements.
 - a. Changes to your program and procedures will be limited to the following areas: training; audit program; radiation monitoring instruments; material receipt and accountability; safe use of radionuclides and emergency procedures; and radiation surveys. In addition, state that you will apply for, and receive an amendment to your license prior to implementing any other programmatic or procedural changes.
 - b. The proposed revision will be documented, reviewed, and approved by the your Radiation Safety Committee in accordance with established procedures prior to implementation.
 - c. The revised program will be in accordance with regulatory requirements, will not change the license conditions, and will not decrease the effectiveness of the Radiation Safety Program.
 - d. Your staff will be trained in the revised procedures prior to implementation.
 - e. Your audit program will evaluate the effectiveness of the change and its implementation.

- Alternately, please state you do not wish to be authorized for this license condition.
6. NUREG-1556, Volume 11, "Consolidated Guidance About Material Licenses, Program-Specific Guidance About Licenses of Broad Scope," Section 8.7.3 states to submit a Radiation Safety Officer Delegation of Authority signed by the licensee's executive management. Please submit a Radiation Safety Officer Delegation of Authority signed by the licensee's executive management.
 7. NUREG-1556, Volume 11, "Consolidated Guidance About Material Licenses, Program-Specific Guidance About Licenses of Broad Scope," Section 8.8 states to submit a description of the radiation safety training program developed for each group of workers, including, topics covered; qualifications of the instructors; method of training; method for assessing the success for the training; and the frequency of training and refresher training. Your application discussed training of the HP staff clearly, but did not appear to discuss training given to other workers in the detail requested. Please submit a description of the radiation safety training program developed for each group of workers (including ancillary personnel), including, topics covered; qualifications of the instructors; method of training; method for assessing the success for the training; and the frequency of training and refresher training.
 8. NUREG-1556, Volume 11, "Consolidated Guidance About Material Licenses, Program-Specific Guidance About Licenses of Broad Scope," Section 8.11 states to provide procedures for waste collection, storage, and the disposal by any of the authorized methods described in this section. You responded by including your procedure, "Management of Radioactive Waste at KFC/CCAFS." Your procedures for decay waste storage and release appear to be contained in steps 5.5.4.2.3, 5.9.13, and 5.9.14. This procedure does not appear to contain the requirements in Condition 22 of your license. Additionally, there is no step to ensuring that monitoring is performed in a low background area. Please submit procedures for decay in waste storage and release that includes these elements. You may wish to refer to NUREG-1556, Volume 11, Appendix V for a model procedure. The NRC also allows for decay in storage up to 120 day half-life which you might consider for your procedure.
 9. You noted that building 49635 has been closed out. If you wish to request release of this building at this time, please submit decommissioning surveys and request release. Please refer to NUREG-1747, volume 1, "Consolidated NMSS Decommissioning Guidance, Characterization, Survey, and Determination of Radiological Criteria for guidance on survey technique and requirements for release.

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).

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

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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.

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 No. 581417. If you have any technical questions regarding this deficiency letter, please call me at (610) 337-5366.

In order to continue prompt review of your application, we request that you submit your response to this letter within 30 calendar days from the date of this letter.

Sincerely,

Original signed by Dennis R. Lawyer

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

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