



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

August 22, 2013

Docket No. 04006329
Control No. 581065

License No. SUD-157

Jerry Conrad
Associate Vice President for Facilities Operations
The Catholic University of America
Department of Environmental Health and Safety
620 Michigan Ave., N.E.
Washington, DC 20064

SUBJECT: THE CATHOLIC UNIVERSITY OF AMERICA, REQUEST FOR ADDITIONAL
INFORMATION CONCERNING APPLICATION FOR AMENDMENT TO
LICENSE, CONTROL NO. 581065

Dear Mr. Conrad:

This is in reference to your application, dated June 3, 2013, requesting to amend Nuclear Regulatory Commission License No. SUD-157. In order to continue our review, we need the following additional information:

- 1) You submitted your Radiation Safety Program Manual with your renewal application. The manual primarily pertains to your Broad Scope License, NRC License No. 08-02075-03. Please confirm whether or not you want to operate this program under the requirements of your Radiation Safety Program Manual.
- 2) Your bioassay program is described on page 9 of your Radiation Safety Program Manual. Please explain how this is implemented with respect to the materials authorized by this license, SUD-157.
- 3) Table 9.3.3.4 of your Radiation Safety Program Manual lists removable surface contamination limits for alpha emitters as 22 dpm/100cm² for unrestricted areas and 220 dpm/100cm² for restricted areas. 10 CFR 20.1402 states that the site will be considered acceptable for unrestricted use if the residual radioactivity that is distinguishable from background radiation results in a TEDE to an average member of the critical group that does not exceed 25 mrem. Decommissioning guidance considers 7 dpm/100cm² with no more than 10% removable for Th-232 to be an acceptable criteria to meet the 25 mrem requirement. Please acknowledge that the surveying methodology described in your Radiation Safety Program Manual may need to be reevaluated in the future if the applicable facilities are to be released for unrestricted use.

- 4) Your current license lists the authorized use as, "Research and development in radioactive waste treatment technology; teaching and training of students." Your application doesn't reference teaching and training of students. Please confirm that you want the authorized use that is listed on your license to include teaching and training of students.
- 5) A decommissioning funding plan, dated September 27, 2012, is currently under review by the NRC. Please indicate that there would not be any changes in the cost estimate if it were dated as of the license renewal application. Alternately, you can submit a revised decommissioning funding plan with new cost estimates.
- 6) Please note that your renewal application included an outdated copy of 10 CFR 19. A current version of 10 CFR 19 and other applicable regulations can be found at <http://www.nrc.gov/reading-rm/doc-collections/cfr/>. No response is required.

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 No. 581065. If you have any technical questions regarding this deficiency letter, please call me at (610) 337-5040 or Michael Reichard at (610) 337-6945.

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 Elizabeth Ullrich

Elizabeth Ullrich
Senior Health Physicist
Commercial and R&D Branch
Division of Nuclear Materials Safety

cc:
Mahmoud Haleem, Radiation Safety Officer

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