

From: [Thompson, Thomas](#)
To: gregory.Hisel@ibamolecular.com
Subject: Your renewal application for NRC license 45-25221-01MD
Date: Wednesday, September 04, 2013 7:59:00 AM

This is in reference to your application dated June 28, 2013 requesting to renew Nuclear Regulatory Commission License No. 45-25221-01MD. In order to continue our review, we need the following additional information:

1. Please clarify your response to item 6 of the NUREG-1556, Vol. 13 , Appendix C checklist. You have indicated that RAD workers may access restricted areas and handle RAM under indirect supervision, however, NRC expects that all use of byproduct materials be under the supervision of an authorized user. That does not necessarily mean physical presence but the activities must remain under supervision.
2. Also in item 6 of the checklist you indicate that you may open unused generator packages that are incoming and may be re-distributed. Please note that if packaging or labeling is altered in any way then this distribution may not be considered re-distribution. Please confirm that packages designated for re-distribution will not be altered in any way.
3. In your response to Item 8.11.1 of NUREG-1556, Vol. 13 it is unclear if you are requesting authorization to receive sealed sources from customers that are no longer needed and therefore acting as a broker in facilitating disposal of the sealed sources. Please clarify if you are requesting to take possession of sealed sources for the purpose of acting as a broker in their disposal. If you are asking only to provide a service of preparing and packaging the sealed sources, but not taking possession, please indicate so
4. Please note that although you have provided detailed emergency procedures and safe opening procedures we normally do not tie specific procedures to your license since you have already indicated you have developed and implemented the procedures on the checklist in Appendix C of your application.

In your reply please refer to Mail Control No. 581297. You may reply by facsimile at 610 337-5269.

Thank you.