

From: [Wilson, Scott](#)
To: [Davidson, Barry S CIV \(US\)](#)
Subject: REQUEST FOR ADDITIONAL INFORMATION CONCERNING APPLICATION FOR AMENDMENT TO LICENSE, CONTROL NO. 582176
Date: Tuesday, October 08, 2013 4:46:00 PM
Importance: High

Scott Davidson, CHP
Radiation Safety Officer
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2400 21st Street
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License No. 19-31127-01
Docket No. 03037133
Mail Control No. 582176

Mr. Davidson:

This is a follow-up to our telephone conversation today in reference to your letter dated September 11, 2013, requesting to amend Nuclear Regulatory Commission License. You requested that I provide you a summary of the items requested during our conversation. Your response to this request should reference our telephone conversation, be documented in writing on your letterhead and signed by yourself or another individual authorized to make commitments on behalf of the organization. In order to continue our review, we need the following additional information:

1. The amendment letter did not provide information regarding the specific training requirements for personnel authorized to use Frontier Model 100 (FM100) sealed sources in the PIMS system. Please respond with more specific information regarding this training. Acceptable items to provide include: 1) frequency of training; 2) description of how the training is administered; 3) a course outline; 4) a description of the method of evaluation; 5) the duration of training; 6) and the extent to which field training or on-the-job training is incorporated.
2. The amendment letter did not provide enough information regarding the use of the FM100 sealed sources. Please respond stating that the FM100 sealed sources will be used in accordance with the manufacturers recommendations and the applicable Sealed Source & Device Safety Evaluation (No. OH-298-S-102-S dated April 3, 2009).
3. The amendment letter did not include operating (use) procedures for the FM100 sealed sources. Please respond stating: "We will develop and maintain operating and emergency procedures for the safe use of sealed sources."
4. The amendment letter did not provide for notification of the NRC in the case of an event or incident. Please respond stating: "NRC reporting requirements and the responsibility for those reports will be included in our procedures."
5. The amendment letter provided a sample sealed source leak test procedure.

Section 2, item 5 of the procedure requires the user to “carefully wipe the surface of each source.” This requirement does not appear to consider the ALARA concept. Please ensure the procedure reflects your organizations ALARA commitment. Consider revising the procedure to reflect the safety precautions you expect to be taken when users work near or handle sources.

6. During our telephone conversation on October 8, 2013, we discussed the administrative items NRC has in its records. Specifically, you mentioned that the mailing address, and the points of contact for the license had changed. Please provide up-to-date information regarding the contact information and mailing address for the license.

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 of your amendment request upon receipt of this information. Please reply via e-mail, facsimile, or US Mail to the attention of the Licensing Assistance Team at Region I (address below), and refer to Mail Control No. 582176. If you have any questions regarding this letter, please call me at (610) 337-5136.

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.

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.

Your cooperation is appreciated.

Thank you,

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