



December 27, 2013

T.D. Naquin  
U.S. Nuclear Regulatory Commission  
NMSS/FCSS/FMB Three White Flint North Mailstop 13A44M  
11601 Landsdown Street  
North Bethesda, MD 20852

Subject: Revision to Amendment Request Dated October 31, 2013 to License # SNM-362

Dear Mr. Naquin:

In response to your email dated December 12, 2013, which transmitted the draft language for a new license condition following our amendment request dated October 31, 2013, we are submitting the following information describing the frequency at which NIST will perform the actions required by 10 CFR 36.61. This response revises the statements made in the subject amendment request.

NIST will not conduct inspection and maintenance checks required by 10 CFR 36.61(a)(1) as specified for 10 CFR 36.23(b) and 36.23(c). NIST is exempt from those requirements based on current license conditions 12 and 13. Please retain current license conditions 12 and 13.

NIST will conduct and document the inspection and maintenance checks required by 10 CFR 36.61 that are applicable to its operations and to license items 6.R and 6.S at the following frequencies:

1. Checks required by 10 CFR 36.61(a)(1) as specified in 10 CFR 36.23(a):
  - a. Verify that it is not possible to move the sources out of their shielded position if the door is open – Annually.
  - b. Verify that opening the door while the sources are exposed causes the sources to return promptly to their shielded position – Once daily when the irradiator is operated.
  - c. Verify that doors and barriers do not prevent any individual in the radiation room from leaving – Annually.

2. Checks required by 10 CFR 36.61(a)(1) as specified in 10 CFR 36.23(d) – Once daily when the irradiator is operated.
3. Checks required by 10 CFR 36.61(a)(1) as specified in 10 CFR 36.23 (e) – Annually.
4. Checks required by 10 CFR 36.61(a)(1) as specified in 10 CFR 36.23(f) – Annually.
5. Confirmation of postings required by 10 CFR 36.61(a)(1) as specified in 10 CFR 36.23(g) – Annually.
6. The operability checks required by 10 CFR 36.61(a)(2) – Once daily when the irradiator is operated.
7. The operability checks required by 10 CFR 36.61(a)(6) – Once daily when the irradiator is operated.
8. The operability checks required by 10 CFR 36.61(a)(8) – Annually.
9. The operability checks required by 10 CFR 36.61(a)(12) [in our case, functioning and wear of the shutter mechanisms] – Annually
10. The operability checks required by 10 CFR 36.61(a)(15) – Annually.

Please contact me if you require additional information.

Sincerely,



Richard F. Kayser  
Chief Safety Officer