



CONVERSATION RECORD

11/22/2013

NAME OF PERSON(S) CONTACTED OR IN CONTACT WITH YOU Clinton Gregg, Radiation Safety Officer (RSO)		DATE OF CONTACT 11/21/2013	TYPE OF CONVERSATION <input type="checkbox"/> E-MAIL <input checked="" type="checkbox"/> TELEPHONE <input type="checkbox"/> INCOMING <input checked="" type="checkbox"/> OUTGOING
E-MAIL ADDRESS clinton.gregg@aptuit.com		TELEPHONE NUMBER (816) 769-4382	

ORGANIZATION Aptuit, LLC	DOCKET NUMBER(S) 030-09415
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LICENSE NUMBER(S) 24-15595-01	CONTROL NUMBER(S) 582236
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SUBJECT  
Our review of your amendment request letter dated October 3, 2013

SUMMARY

We have reviewed your amendment request and find that we are unable to continue this action until we have received additional information outlined on page 2 of this conversation record.

Direct any questions you have to me at (630) 829-9892 or sara.forster@nrc.gov.

As discussed, we expect to receive your written response on or before December 2, 2013.

**Continue on Page 2**

ACTION REQUIRED (IF ANY)

We have requested that the licensee provide additional information, attached to a signed, dated cover letter, as follows:

- Radioactive Materials Use history and disposition information for H-3, C-14, S-35, and I-125

As we discussed, please submit requested information within 10 days of this record, referencing Control No. 582236, as listed at the top of this memo. You may FAX your response to my attention at (630) 515-1078. In the alternative, please scan your response and send to me via email, as a pdf file. Include a signed, dated cover letter with your response.

NAME OF PERSON DOCUMENTING CONVERSATION  
Sara A.B. Forster, Materials Licensing Branch, Region III Office, 2443 Warrenville Road, Suite 210, Lisle, Illinois 60532

SIGNATURE  
*Sara A.B. Forster* 11/22/2013

### CONVERSATION RECORD (continued)

SUMMARY: (Continued from page 1)

C. Gregg

To remove sulfur-35 (S-35) and iodine-125 (I-125) from your license, and to lower the maximum tritium (H-3) and carbon-14 (C-14) possession limits from 100 Ci each to 3 and 8 Ci, respectively, please indicate the radioactive materials use history for each isotope. Include areas of use (AOUs) where radioactive materials have been used under NRC License No. 24-15595-01, and not previously decommissioned/released by report to and/or review by the NRC. For additional guidance when preparing your response, please refer to NUREG 1757, "Consolidated Decommissioning Guidance," Volume 1, Revision 2 (September 2006) and Volume 2, Revision 1 (September 2006), found at web site <http://www.nrc.gov/reading-rm/doc-collections/nuregs/staff/sr1757/>, when preparing your response.

1. For each area of use where unsealed S-35 and/or I-125 were used under the license, submit closeout surveys and final materials disposition (if not submitted previously, under separate cover). In the alternative, if no unsealed S-35 and/or I-125 were used under NRC License No.24-15595-01, please specifically state this for each of S-35 and I-125. For all areas where S-35 and I-125 unsealed materials were used, include the following information with your response, as applicable:
  - i. History of radioactive materials use, by isotope, for that area. Include the last date(s) on which the isotope was used, possessed, transferred, and disposed.
  - ii. Area survey and wipe test results for each area of use to be released as part of any location close-out, including exposure rates and wipe results, background readings, facility diagram with survey and wipes keyed to specific locations, name of person(s) performing closeout survey and wipe-test results, background readings, instrument(s) used, and the last calibration date for the instrument(s) used. NOTE: Survey results submitted previously, under separate cover, need not be submitted at this time.
  - iii. Confirmation that all radioactive waste has been decayed to background radiation or has been transferred to a radioactive waste broker for disposal. For materials transferred or otherwise disposed of, provide the license number and contact information for each facility where the material was transferred. Attach receipt confirmation by the materials recipient, if available.
2. In our conversation, you indicated that you may be revising the requested H-3 and C-14 possession limits to be listed on your license. If you would like to have the license amended to reflect these reduced possession limits, please provide your new H-3 and C-14 possession limits with your response.
3. For each of H-3 and C-14, indicate the maximum total activity actually used/possessed at the 10245 Hickman Mills Drive location of use (lou) listed on the license. If the maximum total activity exceeds the requested possession limits, provide the following final disposition information for each isotope.
  - i. History of radioactive materials use, including maximum total activity actually used/possessed, and current activity possessed. Include the last date(s) on which the isotope was used, possessed, transferred, and/or disposed.
  - ii. To lower the possession limit, describe specific material transfer actions taken to reduce your actual radioactive materials possession. If radioactive waste was generated in removing the tritium, describe the disposal actions taken, including, but not limited to, the disposition of low-level radioactive waste and any sealed sources or foils.
  - iii. For materials transferred to another licensee, specify the date of the transfer and include the recipient licensee's name and license number, and a name and telephone number for a contact person at the recipient licensee. For disposal of radioactive materials, licensees should describe the specific disposal method (e.g., by release into sanitary sewerage). For any materials disposed of by a licensed disposal site or waste contractor, include a copy of the final waste manifest and provide a name, address, and telephone number for a contact person from the site operator or waste contractor.

## Forster, Sara

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**From:** Forster, Sara  
**Sent:** Friday, November 22, 2013 3:30 PM  
**To:** 'clinton.gregg@aptuit.com'  
**Subject:** Additional Information Request for Aptuit, LLC, NRC Lic. No. 24-15595-01  
**Attachments:** 03620.582236.24-15595-01 telecon signed.pdf

Dear Mr. Gregg:

See the attached file for additional information needed to complete the review of your recent license amendment request. Note that the attached conversation record requests additional information on or before close of business on December 2, 2013. Additional guidance may be found in NUREG 1556, Vol. 7, "Program Program-Specific Guidance About Academic, Research and Development, and other Licenses of Limited Scope," which may be found at:

<http://www.nrc.gov/reading-rm/doc-collections/nuregs/staff/sr1556/v7/>:

For decommissioning guidance, you may also refer to NUREG 1757, "Consolidated Decommissioning Guidance," Volume 1, Revision 2 (September 2006) and Volume 2, Revision 1 (September 2006), found at

<http://www.nrc.gov/reading-rm/doc-collections/nuregs/staff/sr1757/>.

Please note that submission of your response as a pdf file attached to an email or via facsimile will allow for the quickest processing. Do not hesitate to call me with any questions you may have.

**Sara A. B. Forster, Health Physicist Licensing Reviewer**  
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Division of Nuclear Materials Safety  
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