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Subject: U.S. NRC Lic. SNM-860 Renewal MCN 584983
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License No. SNM-860
Docket No. 070-00867
Control No. 584983

Dear Mr. Goodison,

Please acknowledge receipt of this email. This is in reference to your renewal request dated September 16, 2014 for Nuclear Regulatory Commission License No. SNM-860. In order to continue our review, we need the following additional information:

- 1) Section 8.5.1, "Sealed Sources and Devices or Unsealed Radioactive Material" of NUREG 1556 Vol. 17 provides information that applicants should include in their license application for sealed sources. Please provide the following the following information for all sealed and plated plutonium sources in your inventory (if available):
 - a) Identity of each radionuclide (element name and mass number),
 - b) Maximum quantity (mass) per source,
 - c) Manufacturer's (distributor's) name and model number,
 - d) Confirm each sealed source is registered as an approved sealed source by NRC or an Agreement State if applicable,
 - e) Confirm that the activity per source will not exceed the maximum quantity listed on the approved certificate of registration issued by NRC or by an Agreement State if applicable.

- 2) In Tab D and Tab F you describe your Radiation Safety training program. Section 8.8, "Training for Individuals Working In or Frequenting Restricted Areas (Occupationally Exposed Individuals and Ancillary Personnel)" of NUREG 1556 Vol. 7 and Vol. 17 addresses training programs and recommended information for licensees to include when preparing license applications. As directed in the NUREGs, provide the following information regarding training:
 - a) State what method of training and assessment will be used for the various groups trained. For example, Tab D references radiation workers, housekeeping, administration, and part-time or temporary employees but does not specify the method of training or assessment. Tab F also includes firefighters, security personnel, and military police but similarly does not specify the method of training or assessment.
 - b) Provide the passing grade used for those whose training is assessed via the exam.
 - c) Will the ancillary personnel receive training prior to being assigned in a position where they will work near or have to respond to radioactive material work areas?
 - d) What is the frequency that ancillary personnel will receive training?

- 3) In Tab E you provided a list of the buildings where licensed material will be used and stored.

Section 8.9, "Facilities and Equipment" of NUREG 1556 Vol. 7 and Vol. 17 provide licensing requirements regarding facilities. As indicated in the "Response from Applicant" section, provide a diagram showing the locations of shielded storage areas, the proximity of the areas to unrestricted areas, and other items related to radiation safety. Alternatively, provide a statement that all radiation sources are stored such that the public dose is not exceeded in unrestricted areas.

- 4) You submitted the USAPHC Regulation 385-24 which contains references to package receipt and accountability however not all aspects were addressed. Section 8.10.3, "Material Receipt and Accountability" of NUREG 1556 Vol. 7 and Vol. 17 as well as Appendix N of NUREG 1556 Vol. 7 outlines the expectations for licensees on this subject. Provide the following commitments,
 - a) "We have developed, and will implement and maintain, written procedures for safely opening packages that meet the requirements in 10 CFR 20.1906."
 - b) "We have developed, and will implement and maintain written procedures for licensed material accountability and control to ensure that:
 - i) Licensed possession limits are not exceeded;
 - ii) Licensed material in storage is secured from unauthorized access or removal;
 - iii) Licensed material not in storage is maintained under constant surveillance and control. Be sure to address any special measures taken when using material at temporary job sites; and
 - iv) Records of receipt, transfer, and disposal of licensed material are maintained.
 - c) Submit procedures for accountability and control of licensed material at temporary job sites. Include responsible personnel as well as radiation safety practices that will be implemented to protect personnel and the public during transport and use.

- 5) Pages 22 and 23 of the USAPHC Regulation addresses leak testing of sealed sources. It indicates that they will be performed by or under the supervision of the RSO or a member of the radiation safety staff. It does not state how the samples will be analyzed. Section 8.10.7, "Leak Tests" of NUREG 1556 Vol. 17 and Appendix R of NUREG 1556 Vol. 7 provide information regarding leak tests. Provide the following information regarding leak tests:
 - a) State that the person performing the analysis of the leak tests will be licensed by the U.S. Nuclear Regulatory Commission or an Agreement State.
 - b) If they are performed "in-house," state who will perform them and confirm that the equipment used will be sensitive enough to detect 185 Becquerels (0.005 microcurie) of the radionuclides in the samples.

We will continue our review upon receipt of this information. Please reply to my attention at the Region I Office by signed letter or fax and refer to Mail Control No. 584983. If you have any questions regarding the above items, please contact me at (610) 337-5076.

In order for us to continue a prompt review we request a reply from you within 30 calendar days from the date of this email.

Regards,

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