

From: [Modes, Kathy](#)
To: ["Doherty, Claire"; Somerville, Mark O](#)
Cc: [Donahue, Christine](#)
Subject: NEED ADDITIONAL INFORMATION: CB&I Radioactive Materials License Amendment 20-31340-01
Date: Monday, November 24, 2014 9:24:00 AM
Attachments: [image003.png](#)
[image001.png](#)
[image002.png](#)
Importance: High

Thank you for making so many improvements to your license amendment request.

Just a few more questions – please bear with me:

1. Please remove Dr. Somerville's home address and personal cellphone number – see item 5 below and scrub all resumes for PII.
2. Please add in something about your bioassay program...you can cite Reg Guide 8.32 for your tritium bioassay program...excerpt from NUREG-1556 Volume 18:



3. Can you remove the following from the procedures or follow the instructions in 10 CFR 2.390 for withhold from the public:



4. Add in a leaking source to your list of emergency notifications because this is a requirement on your NRC license condition 21:



5. Please include Christine Donahue's radiation safety resume – no PII please.

NRC defines PII as: **1. What is and what is not PII?**

PII is information that can be used to identify or contact a person uniquely and reliably or can be traced back to a specific individual. That is, PII is a person's name, in combination with any of the following information: relatives' names, postal address, email address, home or cellular telephone number, personal characteristics, Social Security number, date or place of birth, mother's maiden name, driver's license number, bank account information, credit card information, or other information that would make the individual's personal identity easily traceable. Note that personal identity is distinct from an individual's professional identity; that is, an employee's name, title, work telephone number, official work location, and work email address are not considered to be PII. PII is not information related to the workplace such as the work address, work phone number or work email address. Additionally, the Office of General Counsel has advised that it is not necessary to remove home addresses, home phone numbers, or home email addresses from adjudicatory filings, documents associated with agency rulemakings, and correspondence received from the public on regulatory matters.

6. For your emergency procedures, please provide some examples and indicate that emergency procedures will be developed for all likely scenarios. Some examples may be: medical emergency, leaking source, unintended exposure (internal or external), unusually high (and unexpected) dose rates, natural disasters (e.g., flood, fire, tornado, earthquake, etc.).

This is much better than the last version. I can see you have worked really hard on this effort. Can you please make the changes as soon as possible and resend the entire package to me?

Thanks,

Kathy Modes

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From: Doherty, Claire [mailto:Claire.Doherty@CBIFederalServices.com]
Sent: Thursday, November 20, 2014 1:24 PM
To: Modes, Kathy
Cc: Somerville, Mark O; Donahue, Christine
Subject: CB&I Radioactive Materials License Amendment 20-31340-01

Kathy,

Please see attached revised submittal (ZIP). I am not sure what your limits are for email size. A hard copy will be sent to you also.

I can set up a call to discuss if you have any questions.

Thank you for your guidance.

Claire



Claire Doherty
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