

**From:** [Lawyer, Dennis](#)  
**To:** [Baker, Todd \(Baker.Todd@epa.gov\)](mailto:Baker.Todd@epa.gov)  
**Subject:** Environmental Protection Agency, Request for Additional Information Concerning Application for a License Amendment, Control 586227  
**Date:** Monday, April 13, 2015 1:17:00 PM

---

Dear Mr. Baker,

This is in reference to your letter dated March 2, 2015, requesting for amendment to Nuclear Regulatory Commission License No. 32-14048-04, Docket No. 03008631. In order to continue our review, we need the following additional information:

1. The scoping survey results performed by AMEC Environment & Infrastructure, Inc. are summarized in Figure 9C through 9L. Since Total Beta is displayed, it is unclear what the C-14 represents in the boxes. Please describe the differences in measurement and analysis associated with the Total Beta and the C-14 readings.
2. The Final Status Survey Report was not signed by AMEC Environment & Infrastructure, Inc. It is unclear if this report was modified or is the final report. Please confirm that the submitted report is the final report and has not been modified.
3. The Final Status Survey Report did not state the areas that were impacted. It can be inferred by the report and scoping surveys, but the laboratories and other areas should be stated along with the isotopes that impact that laboratory. Additionally, there are outbuildings around the main building which may have been used for radioactive material storage, receipt, or shipping. Please include these areas, surveys of these areas, or state why they are not included.
4. The survey size was based on the results of the operational clearance and exit surveys of each lab done. The surveys were performed in accordance the site Radiation Safety Manual. Please submit the operational clearance and exit surveys. Please submit procedures, portions of procedures, or portions of the Radiation Safety Manual that describe how these surveys are completed and a description of the instrumentations that is used.
5. The Final Status Survey Report, section 1.5 stated that the following isotopes were used at the facility: iodine-125; phosphorus-32, phosphorus-33; and sulfur-32. It is not clear why surveys were not performed for these radionuclides. Please provide a detailed basis for not including these isotopes in the Final Status Survey.
6. The Final Status Survey Report, section 3.2 states that no elevated readings from scans were noted, and thus investigational surveys were not performed. Table 3.1 states that the maximum reading on the scans was 304 net counts per minute. Table 2.6 states that the minimum detectable count rate above background for detection is 113 counts per minute above background. Please state why static readings were not performed in areas where elevated readings appear to have been found or explain why this is not considered an elevated reading.

We will continue our review upon receipt of this information. Please reply to my attention at the Region 1 Office (Address below) and refer to Mail Control No. 586227. If you have

technical questions regarding this letter, please call me at (610) 337-5366.

*Please note that you may not reply to this letter by return e-mail. Your reply must be in writing by letter, facsimile (610-337-5269), or signed letter attached to an email. If we do not receive a reply from you within 30 calendar days from the date of this e-mail, we will assume that you do not wish to pursue your application.*

Region 1 Office Mailing Address: Licensing Assistance Team, US Nuclear Regulatory Commission Region I, 2100 Renaissance Boulevard, Suite 100, King of Prussia, PA 19406-2713.

Dennis Lawyer  
Health Physicist  
U.S. Nuclear Regulatory Commission  
Division of Nuclear Material Safety  
610-337-5366  
610-337-5269 (F)