

**From:** [Ullrich, Elizabeth](mailto:Ullrich,Elizabeth)  
**To:** [wnelligan@wesleyan.edu](mailto:wnelligan@wesleyan.edu)  
**Subject:** NRC license renewal - additional questions  
**Date:** Thursday, May 28, 2015 3:31:00 PM

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License No. 06-00483-10

Docket No. 030-20108

Control No. 586854

Mr. Nelligan,

I am reviewing your April 28, 2015 renewal application for License No. 06-00483-10 and have a few additional questions:

1. You signed the application for renewal. Normally, we do not have the RSO sign license renewal or amendment applications, but have a management representative sign such letters. A letter signed by a management representative indicates that management has reviewed the application and concurs in the statements and representations contained therein. Note also that a management representative should sign all future correspondence that requests a change in your license. We understand that you are the Director of EHS and are not an authorized user, but would appreciate either a letter from your management that they have read and concurred with the renewal application, or a letter that designates that you should be the appropriate management signature for this application and on future correspondence.
2. Item 8.5.1 states that naturally occurring radioactive material (NORM) is not regulated by the NRC, nor is accelerator-produced material. As a result of the energy Policy Act of 2005, the NRC was given jurisdiction over discrete sources of NORM and over radioactive materials produced in an accelerator. Confirm if you possess any discrete sources of NORM, such as a sealed source containing radium, or if you plan to possess and use radioactive materials produced in an accelerator, such as fluorine-18. If so, provide a brief description of the materials, their uses, and who is using the materials. If additional persons need to be added to the license for such materials, include their name(s) and qualifications.
3. Item 8.6 states that your research may include the use of licensed materials in small animal studies. Confirm that your radiation safety procedures for use of licensed material in animals will incorporate the guidance from Appendix H, "Considerations for Laboratory Animal and Veterinary Uses" of NUREG-1556, Volume 7 "Program-Specific Guidance About Academic, Research & Development, and Other Licenses of Limited Scope".
4. Item 8.7.2 lists Erika Taylor as an authorized user on the license. This individual is not listed on your current amendment, or on previous license amendments, and I was unable to find documentation of her training and experience I past amendment requests. Please provide the following for this individual:
  - a. the type (on-the-job or formal course work), location, and duration of the training. Training should cover (a) principles and practices of radiation protection, (b) radioactivity measurements, standardization, and monitoring techniques and instruments, (c) mathematics and calculations basic to the use and measurement of radioactivity, and (d) biological effects of radiation.
  - b. a description of experience in the use of licensed materials, which should

include the specific isotopes handled, the maximum quantities of materials handled, where the experience was gained, the duration of experience, and the type of use.

Please respond to this request for additional information by regular mail, OR by facsimile of a signed letter to (610) 337-5269 OR by a pdf of a signed letter, attached to an email. Please include your license number, and the control number, on your letter so that the response can be processed correctly as part of this renewal action. If you have any questions, please contact me by telephone or email as shown below.

Thanks,

**Betsy Ullrich**

Betsy Ullrich, Senior Health Physicist

Commercial, Industrial, R&D and Academic Branch

Division of Nuclear Materials Safety

US NRC Region I Office

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