

Junod, Rebecca

From: Marine, Patrick M CIV USARMY RDECOM ARL (US) <patrick.m.marine.civ@mail.mil>
Sent: Wednesday, September 23, 2015 5:30 PM
To: Ullrich, Elizabeth
Cc: Reichard, Michael
Subject: [External_Sender] Re: license error to 19-12056-02 ARL

Q-5

Thanks that will work just fine. Much appreciated.

Patrick Marine
ARL RSO

Sent from my iPhone

- > On Sep 23, 2015, at 5:23 PM, Ullrich, Elizabeth <Elizabeth.Ullrich@nrc.gov> wrote:
- >
- > LN 19-12056-02
- > DN 030-04555
- > Control No. 584191 Corrected Copy
- >
- > Patrick,
- >
- > As we discussed on the phone, your renewal application requested that
- > elements 38 AND 53 be omitted from the list, not 38 THROUGH 53.
- > However, because Condition 12 on your license requires that you
- > maintain quantities below those for which financial assurance (FA) is
- > required, there is no reason to eliminate elements 38 and 53 from the
- > list. The list also contains a catch-all for "any alpha emitter" and "any beta-gamma emitter"
- > which is included in your range of radionuclides and for which FA
- > limits are very low. While I grant that these FA limits are less than
- > the amount authorized per radionuclide, the Condition 12 would
- > override that for such radionuclides.
- >
- > You will, however, need to maintain an inventory such that those
- > elements with half-lives greater than 120 days and FA restrictions to
- > ensure that you never possess quantities for which FA is required.
- > Please keep in mind that the FA requirement also requires use of the "unity rule".
- >
- > If it is acceptable to you, the Corrected copy for line item 6.B. will
- > be for radionuclides 1 through 83, and 8.B will state "XXX
- > millicuries per radionuclide and YYY millicuries total, and see Condition 12"
- >
- > Please contact me if you have any questions.
- > Betsy
- >
- >
- > Betsy Ullrich, Senior Health Physicist Commercial, Industrial, R&D and
- > Academic Branch Division of Nuclear Materials Safety US NRC Region I
- > Office
- > (610) 337-5040 (office)
- > (484) 919-8348 (cell)
- > Elizabeth.Ullrich@nrc.gov

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> -----Original Message-----
> From: Marine, Patrick M CIV USARMY RDECOM ARL (US)
> [mailto:patrick.m.marine.civ@mail.mil]
> Sent: Wednesday, September 23, 2015 3:46 PM
> To: Ullrich, Elizabeth <Elizabeth.Ullrich@nrc.gov>
> Subject: [External_Sender] license error to 19-12056-02 ARL
>
> Hi Betsy I hope you are well.
>
> First I am reading up on how to properly write the DFP you requested
> (first time doing one) and you will have it soon, (I will address the
> DFP fully as soon as I finish annual rad refresher training this week)
>
> On another note I will be submitting an amendment to allow us to have
> Thorium 230 sources that were previously grandfathered under the
> "Small quantities of Source Material" but wanted to get my DFP
> straight before that was submitted.
>
> Lastly I just realized our 19-12056-02 Byproduct license has a typo in
> it that I didn't catch when you sent it to us.
>
> We requested for Line B, any byproduct material with atomic numbers
> 1-83 excluding atomic numbers 38 and 53 (Strontium and iodine). This
> was done as Mr. Reichard indicated we would require financial
> assurance at those activities of Iodine and Strontium so I requested
> those 2 isotopes be excluded from the unsealed line.
>
> It seems the "exclude 38 and 53 " somehow became exclude 38-53
>
> I have attached the supporting documents and highlighted the pertinent
> sections.
>
> Do you want to send a corrected copy now or just wait until the DFP
> and amendment are processed and do it all at once?
>
> We currently don't have any unsealed material between 38-53, just want
> to correct for the future.
>
> I have copied my management and chairman to keep them in the loop.
>
> Thanks
>
>
>
> Patrick Marine
> ARL @ APG RSO/LSO/RFSO
> Health Physicist
> B1132a on Spesutie Island
> 410-278-5699 work landline
> 443-619-2795 work cell
> 443-350-4281 personal cell (for afterhour emergencies if no answer on
> work