

From: [Lawyer, Dennis](#)
To: "svann@odu.edu"
Subject: Old Dominion University, Request for Additional Information Concerning Application for a License Amendment, Control 588977
Date: Thursday, October 29, 2015 2:31:00 PM

Dear Ms. Vann,

This is in reference to your NRC Form dated September 18, 2015, and letter dated September 21, 2015, requesting to terminate Nuclear Regulatory Commission License No. 45-09599-03, Docket No. 030-16045. In order to continue our review, we need the following additional information:

Your application should have been signed by a management representative rather than the Radiation Safety Officer. Please submit a letter signed by a management representative indicating 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.

Your license has authorized temporary job sites in federal jurisdiction and aboard research vessels since September 11, 1979. Please confirm that you did not use unsealed materials other than on the ship SLOVER. If other sites were used, please submit release surveys.

Your license authorizes the use of nickel 63 foil or plated sources. Confirm that these were not used at any temporary job site or aboard research vessels, or provide the last leak test from sources used in these locations, or alternatively state that there has been no leaking sources identified.

Prior to termination of a license, 10 CFR 30.35(g), 30.36(k)(4) and 30.51 require that you submit to the NRC certain records. Please submit the following records, or state that such records are not applicable because these activities were not performed and records are not applicable.

- a. for unsealed materials with half-lives greater than 120 days, records for disposal made pursuant to 10 CFR 20.2002 (alternate disposal procedures, including burial authorized prior to January 28, 1981), 20.2003 (disposals to the sanitary sewerage system), 20.2004 (incineration of wastes), 20.2005 (disposal of specific wastes including liquid scintillation cocktail and animal tissue), and 20.2103(b)(4), evaluations of effluent releases.
- b. records important for decommissioning as described in 30.35(g). Examples of such records include but are not limited to: records of contamination, identifying the radionuclides, quantities and concentrations; as-built drawings and modifications of structures and equipment in restricted areas and locations of inaccessible contamination such as buried pipes; a single list, updated at least every 2 years, of areas to which access is limited for the purpose of radiation protection (restricted areas); and records related to the provision of financial assurance.

No license will be terminated until the required records are received by the NRC. Records may be transferred to the U.S. Nuclear Regulatory Commission, Region I, 2100 Renaissance Blvd, Suite 100, King of Prussia, PA 19406-2713, or to the new licensee if

licensed activities will continue at the same location under another Commission license.

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. 588977. 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.

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