From:	Lawyer, Dennis
To:	"haleem@cua.edu"
Subject:	The Catholic University of America, Request for Additional Information Concerning Application for a License Renewal, Control 588274
Date:	Wednesday, November 04, 2015 7:02:00 AM

Dear Mr. Haleem,

This is in reference to your letter dated June 29, 2015, requesting for renewal to Nuclear Regulatory Commission License No. 08-02075-03, Docket No. 03000638. In order to continue our review, we need the following additional information:

1. 10 CFR 30.35 requires that licensees authorized to possess and use unsealed licensed material with a half-life greater than 120 days in quantities greater than those described in 10 CFR 30.35(a) must submit decommissioning funding plan (DFP) in any new or renewal application. This plan must include an actual estimate of the costs for decommissioning your facility and a description of the methods of assuring funds in accordance with 10 CFR 30.35(e). The appropriate level of detail for the cost estimate is discussed in Appendix A.3 to Volume 3 of NUREG-1757, "Consolidated NMSS Decommissioning Guidance." If the DFP cost estimate is greater than your current certification of financial assurance, you must submit a revised financial assurance instrument in the prescribed amount of the cost estimate and a Certification of Financial Assurance. Please follow closely the recommended wording for financial assurance mechanisms found Appendix A to Volume 3 of NUREG-1757. Please submit these documents in a separate enclosure. Financial instruments need to be submitted with an original signature.

2. In your material request in Item No. 5, specific isotope requested allowances for lead-210, lead-214, and bismuth-210 are all less than the broadscope allowance of 10 millicuries per nuclide. Please state why you wish to be licensed for less than the broadscope authorization for these isotopes or remove these specific isotopes from your request. Please note that removal of the isotopes will need to be changed in the certification of financial assurance.

3. In your material request for Cobalt-57 sealed source, Nickel-63 foils, and Samarium-151 sealed source in item 5 letters AA., CC., and DD., please include the manufacturer and model number as registered in the sealed source registry. The current identifiers are not complete or can't be found. 10 CFR 30.32(g) requires applicants to submit the source or device by manufacturer and model number as registered with the commission, with other alternatives submission discussed in the regulation. Please review the regulation and provide as much information as possible about the sources to assist in identifying the sources.

4. The material request in Item 5, letter BB. Nickel-63 foils appears to be sources that should be contained within a Perkin-Elmer Gas Chromatograph Detector Cell Models 009-0282 or 009-0270. Please confirm if this is correct or if in a different device.

5. In item 6, you did not request for use of the material for animal studies which is currently authorized on your license. Section 9.3.14 of your application suggests that you may wish to continue to use material for animal studies. Please provide

what additional information about facilities, radiation safety precautions, and training for users associated with animal care.

6. In item 9 of your application, you described some conditions associated with your facilities. Section 8.9 of NUREG-1556, Volume 11, "Consolidated Guidance About Material Licenses, Program-Specific Guidance About Licenses of Broad Scope," states to include your method of classifying laboratories based on type, toxicity and quantity of byproduct material being requested. Sample diagrams should be provided for each classification scheme that take into consideration shielding, the proximity of radiation sources to unrestricted areas and other items related to radiation safety. When reviewing facilities where radioactive materials may become airborne, sample diagrams should take into considerations descriptions of ventilation systems including pertinent airflow rates, pressure, filtration equipment an monitoring systems. For special application facilities such as alpha laboratories, radioactive waste processing facilities, radioactive waste storage facilities, and sealed source storage areas, you will need to specify their locations and special considerations that your RSC will use in authorizing byproduct material use.

7. License Condition 23 currently authorizes you for additional flexibility in changing your program. It appears that you have not requested this authorization with your renewal. Please confirm. Alternatively, NRC will provide even greater flexibility to Type A Broad Scope licensees to make programs changes and changes to procedures specifically identified in documents which were previously approved by the Commission and incorporated into the license, without prior Commission approval. If you would like authorization for this flexibility, please provide the following statements.

    a. Changes to your program and procedures will be limited to the following areas: training; audit program; radiation monitoring instruments; material receipt and accountability; safe use of radionuclides and emergency procedures; and radiation surveys. In addition, state that you will apply for, and receive an amendment to your license prior to implementing any other programmatic or procedural changes.

    b. The proposed revision will be documented, reviewed, and approved by your Radiation Safety Committee in accordance with established procedures prior to implementation. At a minimum, documentation shall state the reason for the change and summarize the radiation safety matters that were considered prior to approval of the change.

    c. The revised program will be in accordance with regulatory requirements, will not change the license conditions, and will not decrease the effectiveness of the Radiation Safety Program.

    d. Your staff will be trained in the revised procedures prior to implementation.

    e. Your audit program will evaluate the effectiveness of the change and its implementation.

8. In your application, you appeared to describe a training program in item 8 and

section 9.2.12 for radiation workers and ancillary personnel (maintenance, security, etc.). The training program did not appear to meet the response guidance as stated in NUREG-1556, Volume 11, section 8.8. Please submit a description of the radiation safety training program developed for each group of workers, including topics covered, and the frequency of training and refresher training. Appendix J of NUREG-1556, Volume 7 addresses radiation safety training topics and may be helpful in developing your response.

9. In your application, it did not appear that you stated how you would obtain calibrated survey instruments. As stated in NUREG-1556, Volume 11, section 8.10.2, it states to submit procedures for instrument calibration or state that the instruments will be calibrated by a vendor who is licensed by NRC or an Agreement State to perform instrument calibrations. Licensees who want authorization to calibrate their own survey instruments may commit to implementing the model procedures published in Appendix O of NUREG-1556, Volume 11. Please state how you will obtain calibrated survey instruments.

10. Your application did not appear to include leak test procedures. As stated in NUREG-1556, Volume 11, section 8.10.7, please submit your leak test procedures. As an alternative, you may sate, "We will implement the model leak test program published in Appendix T of NUREG-1556, Volume 11, 'Program-Specific Guidance About Licenses of Broad Scope."

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. 588274. 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)