

**DATE OF TRIP:** October 22, 2015

**MEMORANDUM TO:** File

**LOCATION:** 3635 Vista Avenue  
St. Louis, Missouri

**LICENSE NOS.:** 41-32720-04MD  
41-32720-03

**DOCKET NO.:** 030-38228  
030-38230

**PARTICIPANTS:** **PETNET Solutions, Inc.**

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**U.S. Nuclear Regulatory Commission (NRC)**

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**PURPOSE:** TO DISCUSS THE DOCUMENTATION DATED JUNE 23, 2015  
SUBMITTED TO NRC (ML15180A340) CONCERNING  
PROPOSED DECOMMISSIONING ACTIVITIES AT THE  
LICENSEE'S FACILITY

**BACKGROUND:** In a letter received June 23, 2015, the licensee requested a  
license amendment concerning proposed decommissioning  
activities at the site. Although the licensee submitted the

document as a Decommissioning Plan, the discussion during the licensing visit was to determine the status of the program to date.

**DISCUSSION:**

The NRC staff met with licensee management and staff, including contractor personnel, to discuss NRC policies and documentation that would be required as part of any decommissioning activities, remediation methodologies, proposed final status survey activities and methods used to quantify the waste. The NRC inspectors also had questions regarding the total source term and whether the licensee had intended to request a waste disposal exemption under 10 CFR 20.2002.

The NRC toured the facility where decommissioning operations will occur with licensee personnel.

**CONCLUSION:**

The licensee agreed to provide an addendum to the document submitted in June 2015 to support decommissioning operations at the site which was to include total source term of the project, how and when the cyclotron is to be disposed of, and additional clarification on the facility characterization and remediation plan and the 10 CFR 20.2002 request. The licensee also agreed to provide procedures for dismantling of the cyclotron and the method used to quantify the radiological activity of the cyclotron components.

The NRC committed to review the additional documentation to determine whether a decommissioning plan or other significant licensing actions would be required to start decommissioning operations.

The licensee committed to submit the new information within 2 months.

The NRC indicated that an inspection is to be planned on-site to observe the dismantlement of the cyclotron and quantification of the radiological activity of each component of the cyclotron.

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