

Lawyer, Dennis

From: Lawyer, Dennis
Sent: Monday, November 16, 2015 2:43 PM
To: 'svann@odu.edu'
Subject: Old Dominion University, Request for Additional Information Concerning Application for a New License, Control 589282

Dear Ms. Vann,

This is in reference to your application dated October 23, 2015, requesting for a new Nuclear Regulatory Commission License No. 45-09599-05, Docket No. 03038886. In order to continue our review, we need the following additional information:

1. 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. Please include the management representative's name, title, telephone number, facsimile number, and electronic mail address. Note also that a management representative should sign all future correspondence that requests a change in your license.
2. The amount of material you requested requires financial assurance. The possession limits requested in your licensing action require that you submit financial assurance in accordance with the requirements of 10 CFR 30.35. Submit the required financial assurance or modify your licensing request such that financial assurance is not required. You may wish to refer to Volume 3 of NUREG-1757, "Consolidated NMSS Decommissioning Guidance" for assistance in formulating your response. Alternately, you may request for a lower quantity of material which does not require financial assurance.
3. Your application discusses animal studies. Do you need authorization for the use of animal studies aboard research vessels?
4. You requested only for the use licensed material aboard the sea vessel, *Slover*. The license location of use is normally written as aboard research vessels of the licensee anywhere in the United States where the U.S. Nuclear Regulatory Commission maintains jurisdiction for regulating the use of licensed material, including areas of exclusive Federal jurisdiction within Agreement States. Please confirm you wish to only be licensed aboard the sea vessel, *Slover* or on research vessels of the licensee anywhere the United States maintain jurisdiction for regulating the use of licensed material.
5. As discussed in NUREG-1556, Volume 7, "Consolidated Guidance About Material Licenses, Program-Specific Guidance About Research and Development, and Other Licenses of Limited Scope," section 8.9, please describe the facilities and equipment that would be typically aboard research vessels for performing licensed activities. Please submit a typical diagram of the lab used on the research vessel.
6. As discussed in NUREG-1556, Volume 7, Section 8.10.2, please provide a description of the instrumentation that will be used to perform required surveys.
7. You state in section XX of your application, all radiation dose greater than 10 percent of the occupation dose limits shall be issued appropriate personal monitoring devices. Your application does not state what will be done for those that are less than 10 percent of the occupational dose limits. As stated in NUREG-1556, Volume 7, section 8.10.4, please state, "We have done a prospective evaluation and determined that unmonitored individuals are not likely to receive, in one year, a radiation dose in excess of 10% of the allowable limits in 10 CFR 20."

8. In section XVIII.E, of your application, you described "Acceptable" contamination levels for unconditional release of areas. Please state when these surveys would be required when associated with the use of licensed materials on sea vessels.

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.589282. 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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