

## Lawyer, Dennis

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**From:** Lawyer, Dennis  
**Sent:** Thursday, December 03, 2015 1:01 PM  
**To:** 'george.mills@vermont.gov'  
**Subject:** Vermont Department of Health, Request for Additional Information Concerning Application for a License Amendment, Control 589443

Dear Mr. Mills,

This is in reference to your letter dated November 18, 2015, requesting for amendment to Nuclear Regulatory Commission License No. 44-11382-01, Docket No. 03006501. In order to continue our review, we need the following additional information:

1. Please provide the contact telephone number, facsimile number and email address for the proposed Radiation Safety Officer, Jessica M. Eisenhauer.
2. 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 confirm that you have the following records, if applicable, and have transferred them to your new location so that you are able to submit them to the NRC when the license is terminated.
  - 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.
3. You have submitted surveys of your facility, but it is not clear that survey follows the guidance in NUREG-1757, Volume 1, "Consolidated Decommissioning Guidance: Decommissioning Process for Materials Licensees." It appears that you have used the simplified survey procedure listed in Figure 8.1 of NUREG-1757, Volume 1. Figure 8.1 states to perform one hundred percent scanning of all surfaces in the area of the facility where licensed material was used or stored, using an appropriate radiation detection instrument (including scan sensitivity); and to perform evaluations for total and removable radioactive material at each area exhibiting elevated radiation levels. Please state how much scanning was performed of your lab areas where licensed material was used, its scan sensitivity, and if you detected any area exhibiting elevated radiation levels. Please include the results of the evaluation of total and removable radioactive material at these elevated locations.
4. Based on a review of your license and the inspection history, you have possessed sealed sources. Please state if you have or have not had any sealed sources that have leaked.

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. 589443. 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)