



December 7, 2015

Mr. Dennis Lawyer  
Licensing Assistance Team  
U.S. Nuclear Regulatory Commission, Region I  
2100 Renaissance Boulevard, Suite 100  
King of Prussia, PA 19406-2713

License Number 07-01579-19  
Docket No. 030-10925  
Mail Control No. 589256

Dear Mr. Lawyer

Below is the additional information you requested in order to complete the review of our application dated October 15, 2015.

1. To insure efficient delivery of mail to our office, please include "General Services Building, Room 132" in our mailing address. This was mistakenly excluded from the NRC Form 313 we submitted.
2. Item 5.D. is intended to allow the use of disk and rod sources for calibration of instruments. 10CFR 30.32(g)(4) seems to allow these to be identified as a group and not individually. Possession limit for Item 5.D. can be more realistically set at 5 millicuries per source and 100 millicuries total. If our use of rod and disk calibration sources can be covered under Items 5.A, 5.B, and 5.C, then Item 5.D can be deleted.
3. Instructors who provide radiation safety training meet the qualifications for RSO or authorized user on the license and are familiar with the University's radiation safety program. Presently, all didactic training is provided directly by the RSO or by another Environmental Health and Safety staff member who has been trained by the RSO in the pertinent safety topics. On-the-job training is provided in the lab by the Radiation Permit Supervisor or his/her designee who is trained and experienced in the radioactive protocol(s) to be performed.

The success of training is assessed primarily during radiation safety audits of radiation work locations. Audit deficiencies that may indicate a weakness in the training program prompt adjustments in the training presentation. Additionally, workers are interviewed during safety audits to confirm they are knowledgeable in the safe and compliant use of radioactive material.

4. Here are more details on the training of personnel who care for laboratory animals.
  - a. In most cases, care of animals will be the responsibility of the lab researcher who subjected the animals to radioactive material, and thus, the caretaker will have already undergone radiation safety training. The researcher will be obligated to follow specific animal care requirements reviewed and approved by the Radiation Safety Committee (RSC) during the protocol approval process. The RSO will meet with the researcher prior to animal work to ensure that all animal care requirements are understood. Typically, the RSC requires that the RSO be present to supervise initial procedures of a new animal protocol.
  - b. In the rare case when an animal care facility worker will care for radioactive animals (provide food/water, change/dispose of bedding, clean/dispose of cages, etc.), the RSO will meet with the worker to provide training in radiation, radiation health effects, dose minimization practices, security, contamination control measures, correct disposal, and emergency response. This will be conducted in the animal care facility at the site of animal care. The RSO will observe the worker employ contamination control measures, use survey equipment, and manage waste to ensure that training has been effective. Written radiation safety procedures will be posted at the site of animal care.
  - c. Those animal care workers who are not caretakers of radioactive animals but work in the room where radioactive animals are housed will be provided radiation safety awareness training by the RSO or his/her qualified designee.

Please contact me if you have questions regarding the additional information that has been provided.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'W. Fendt', with a long horizontal stroke extending to the right.

William Fendt  
Radiation Safety Officer