

## Lawyer, Dennis

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**From:** Lawyer, Dennis  
**Sent:** Thursday, March 31, 2016 3:18 PM  
**To:** 'barry.s.davidson.civ@mail.mil'  
**Cc:** Wilson, Scott  
**Subject:** Department of the Army, Request for Additional Information Concerning Application for a License Renewal, Control 590461

Dear Mr. Davidson,

This is in reference to your application dated March 10, 2016, requesting for renewal to Nuclear Regulatory Commission License No. 19-31127-01, Docket No. 030-37133. In order to continue our review, we need the following additional information:

1. Title 10 CFR 30.32(g), in part, states for byproduct material that you must provide the manufacturer and model number of the sources as registered in the sealed source or device registry. Several alternate forms of information can be provided as stated in the section of that regulation. The following sources could not be identified in the list: Americium-241 Model PHI-241 (Note there is a Model PHI-241 GFS); Americium-241 DuPont Model No. NES-128S and Amersham Source No. 72658-1; Americium-241 No source model number given; and Radium-226, no source model number given. Please provide the manufacturer and model number for these sources as registered in the sealed source and device registry or provide the alternative information as stated in the associated sections of 10 CFR 30.32(g). Note that alpha emitting sources of less than 10 microcuries only need the manufacturer, model number, and amount of activity for the sources you possess.
2. There are multiple locations of use on the license. Please provide enough information for an inspector to locate personnel who are in response for the material on site. Command name, general telephone number, and address within the complex.
3. On page 3 and 4 of your application, you have submitted information associated with individuals responsible for radiation safety program and their training. Your training program is unclear. Section 8.8 of NUREG-1556, Volume 7, "Program-Specific Guidance About Academic, Research and Development, and Other Licenses of Limited Scope Including Gas Chromatographs and X-Ray Fluorescence Analyzers" states to provide, "A description of the radiation safety training program, including topics covered, groups of workers, assessment of training, qualifications of instructors, and the method and frequency of training." It appears the groups of workers are: authorized users and for individuals working in or frequenting restricted areas along with special training requirements for those involved with Cf-252. It did not appear that you clearly described the topics covered for each of these groups. It is unclear how training for individuals working in or frequenting restricted areas training is assessed. It did not appear what the frequency of training is required. Additionally, you have stated additional training is given but is not clear if these courses are required and to what group of workers. An outline of training topics is given Appendix J, of NUREG-1556, Volume 7. Please provide a clear statement for each group of workers what topics covered, how assessment of training is performed, the method, and frequency of training.
4. In section 9 of your application, you state that the sources are stored in shielded drums. You describe the storage in yard areas as secured but did not appear to describe if the storage in buildings are secured. Please describe the security of materials that are stored in buildings.
5. In section 9 of your application, you state that storage is a principal activity under the license. In general, storage is not a principal activity and does not appear to be a principal activity for this license. You may wish to review a recent Regulatory Issue Summary 2015-0019

<http://pbadupws.nrc.gov/docs/ML1522/ML15226A397.pdf>. The Commission may grant an exception to the decommissioning requirements under 10 CFR 30.36(f). Guidelines for submission can be found in NUREG-1757, Volume 3, Revision 1, Consolidated NMSS Decommissioning Guidance - Financial Assurance, Recordkeeping, and Timeliness <http://www.nrc.gov/reading-rm/doc-collections/nuregs/staff/sr1757/v3/>. No response is required for this section.

6. You appear to have used the guidance in NUREG-1556, Volume 7, Revision 1, for your application. Unfortunately, that revision is currently in Draft. Please make the following similar statements in your application about instruments and leak testing:

“We will use instruments that meet the radiation monitoring instrument specifications published in Appendix M to NUREG -1556, Vol. 7, 'Program-Specific Guidance About Academic, Research and Development, and Other Laboratory Licenses of Limited Scope,' dated December 1999.” And

“Leak tests will be performed by an organization authorized by NRC or an Agreement State to provide leak testing services to other licensees or using a leak test kit supplied by an organization authorized by NRC or an Agreement State, to provide leak test kits to other licensees and according to the sealed source or plated foil manufacturer's (distributor's) and kit supplier's instructions. As an alternative, we will implement the model leak test program published in Appendix R to NUREG -1556. Vol. 7, "Consolidated Guidance about Materials Licenses: 'Program-Specific Guidance About Academic, Research and Development, and Other Licensees of Limited Scope' dated December 1999.”

7. In section 10.3 Calibration of your application, you stated that contamination survey equipment is calibrated and maintained by your units. In section 8.10.2, it states to make the following statement if you wish to calibrate instruments: “Additionally, we will implement the model survey meter calibration program published in Appendix M to NUREG -1556, Vol. 7, 'Program-Specific Guidance About Academic, Research and Development, and Other Licenses of Limited Scope,' dated December 1999.” Or you can provide a description of alternative equipment and/or procedures for ensuring that appropriate radiation monitoring equipment will be used during licensed activities and that proper calibration and calibration frequency of survey equipment will be performed.
8. In section 10.6 Safe Use of Radionuclides and Emergency Procedures of your application, you make a statement that you are not required to post Caution-High Radiation Area signs inside exclusion areas in accordance with 10 CFR 20.1902. Please note that nothing written in your application may contradict what is required by regulation. As permitted under 10 CFR 20.1903, exceptions in posting requirement, authorizes the posting exception.
9. The last paragraph in section 10.6, Safe Use of Radionuclides and Emergency Procedures of your application, states that you may revise procedures. Procedures as submitted to the NRC in this application may not be changed as written in Condition 17 of your license. This submitted section is reserved for broadscope A licensee and not limited scope licensee. Please state that you understand that procedures and commitments made in your application may not be changed without further amendment.

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. 590461. If you have technical questions regarding this letter, please call me at (610) 337-5366.

Your reply must be an originally signed and dated letter. The letter may be scanned and submitted as a pdf document attached to an email; or it may be transmitted by facsimile to (610) 337-5269; or it may be sent by regular mail. 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 OR amendment request.

Please respond by e-mail to acknowledge that you have received the e-mail request for additional information.

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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