

**From:** [Lawyer, Dennis](mailto:Lawyer.Dennis)  
**To:** ["kevin@budneyoverhaul.com"](mailto:kevin@budneyoverhaul.com)  
**Cc:** [Durkee, David J. \(David.J.Durkee@pfizer.com\)](mailto:Durkee.David.J.(David.J.Durkee@pfizer.com))  
**Subject:** Budney Overhaul & Repair, LTD., Request for Additional Information Concerning Application for a License Amendment, Control 590955  
**Date:** Thursday, July 21, 2016 10:56:55 AM

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Dear Mr. Budney,

This is in reference to your letter dated May 11, 2016, requesting to terminate Nuclear Regulatory Commission License No. STB-1530, Docket No. 04008974. In order to continue our review, we need the following additional information:

1. Prior to termination of a license, 10 CFR 40.36(f), 40.42(k)(4) and 40.62 require that you submit to the NRC certain records. Please submit the following records, confirm that you did not perform these activities, or explain why such records are not applicable.
  - 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 10 CFR 40.36(f). 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; and a single list, updated at least every 2 years, of areas to which access is limited for the purpose of radiation protection (restricted areas).
  - c. No license will be terminated until the required records are received by the NRC. Records may be transferred to the U.S. Nuclear Regulatory Commission, Region I, 2100 Renaissance Blvd, Suite 100, King of Prussia, PA 19406-2713, or to the new licensee if licensed activities will continue at the same location under another Commission license.
2. The waste storage container has been surveyed for loose surface contamination and radiation readings, but it does appear to have been included in the direct survey readings for contamination, nor did it appear to be included in the class 3 random direct readings in the building. Please conduct a couple random fixed point surveys in the waste storage container which has been used to store radioactive material for multiple years.
3. In the Decommissioning Funding Plan dated March 12, 1997, the attachment one diagram shows a restricted area, and a waste storage area within the building which based upon the review of documents had been maintained for many years. Because the diagram of the building is different than the diagram of the facility submitted in your letter, it is unclear if any of the random direct readings were in these two areas. If no direct surveys were performed, it is recommended you consider use of a separate zone or at least some judgmental surveys taken in these two zones along with direct survey scanning.
4. NUREG-1575, Rev 1, "Multi-Agency Radiation Survey and Site Investigation Manual (MARSSIM)," Table 2.2 shows for class 3 areas to perform scanning per judgement.

You did not perform any scans. Please state the reasons for not performing any scan surveys.

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. 590955. 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 10 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.