

From: [Lawyer, Dennis](#)
To: [Simpson, Paul D. \(CDC/OCOO/OSSAM\) \(pds1@cdc.gov\)](#)
Cc: [Stinson, Narvaez \(CDC/OCOO/OSSAM\) \(nks5@cdc.gov\)](#)
Subject: U.S. Department of Health & Human Services, Request for Additional Information Concerning Application for a License Amendment, Control 591780
Date: Tuesday, September 13, 2016 8:04:00 AM

Dear Mr. Simpson,

This is in reference to your letter dated August 24, 2016, requesting for amendment to Nuclear Regulatory Commission License No. 10-06772-01, Docket No. 03004001. In order to continue our review, we need the following additional information:

1. The submitted information associated with instrument calibration appears to be incomplete or not relevant to the requested release. Please submit the current calibration records for all survey instruments and detectors used during this release survey along with efficiency information. You provided the following calibration information: Instrument 2350-1 #186177, calibration performed October 5, 2015, which did not appear to be used in this survey; Instrument 2224-1 #187286 with 43-93, PR2994119, calibration performed April 27, 2015, which would appear to be beyond the calibration due date during the survey; Probe 43-37-1 #PR352912 attached to 2350-1 #186177, which does not appear to have been used in the survey; and Instrument 2350-01 #212234 with probe GP13A #360, calibration done July 31, 2015, which also does not appear to be used in the survey. Instrument calibration for Ludlum 2350-1 #186180 and GP13A probe, Ludlum 2224 with 43-93 probe, Ludlum 2350-1 #203439 with BP19DD detector; Ludlum 2350-1 #203447 with GP13A detector which was stated was used in the survey did not appear to have calibration information presented.
2. In section 8.3.3.1 of your report, you state: "The probability of detecting a single count while passing over the contaminated area for 100 cm² probe was not possible due to the limitations on probe size, background and detector efficiency; therefore, only the larger (821 cm²) gas-proportional detectors was used for alpha scans." However, in section 17.6 you do not present that you scanned with anything larger than a 100cm² detector. Additionally, you present MDC scan using the beta scan methodology calculation in Appendix D of your worksheet instead of the methodology presented in the report under section 8.3.3.2. Please restate how you performed alpha scans, present probability of detection for the instruments used, and present any additional results that was done for suspect areas that surveys needed to stop and perform specific fixed point surveys due to the result being higher than the MDC in a clear and comprehensive manner.
3. Sample 1 of Survey Unit 4 survey results for loose surface contamination results are 23.8 dpm/100 cm² alpha which is above the DCGL for alpha per License Condition 20. No discussion or follow up of the survey was presented, nor was it noted as being above the DCGL. Please re-perform surveys in this area to determine size of the contamination and if the area can be cleaned up. Please present further documentation to why this area may be released.
4. The static measurements displayed in the spreadsheets of appendix F show that the beta meter efficiency is 7.51% and alpha efficiency of 10.32 %. The appendix D

Analytical Worksheets show that the beta total efficiency is 10.32% and the alpha total efficiency is 7.51%. Please resubmit whichever is incorrect.

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. 591780. 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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