

From: [Lawyer, Dennis](#)
To: [O'Connor, Colin](#)
Subject: U.S. Department of Homeland Security, Request for Additional Information Concerning Application for a License Amendment, Control 592913, License No. 29-13141-06, Docket No. 03030808.
Date: Thursday, February 09, 2017 10:38:00 AM

Dear Mr. O'Connor,

This is in reference to your letter dated January 19, 2017, requesting for amendment to Nuclear Regulatory Commission License No. 29-13141-06, Docket No. 03030808. In order to continue our review, we need the following additional information:

1. It appears that your application should have been signed by a management representative (Christopher Smith, Chief Engineer) rather than the Radiation Safety Officer. Please submit a letter signed by a management representative indicating that management has reviewed the application and concurs in the statements and representations contained therein. Note also that a management representative should sign all future correspondence that requests a change in your license.
2. It appears that you have requested to use sealed sources that are registered in the sealed source and device registry for research in unregistered devices. This will incur another line item on your license. Please state the maximum possession limit of nickel 63 that you would like to be licensed for each type of source that has a different maximum activity per source listed on the sealed source and device registry.
3. 10 CFR 30.32(g) requires that an application for a specific license to use byproduct material in the form of a sealed source or in a device that contains a sealed source must either identify the source or device by manufacturer and model number as registered with the U.S. Nuclear Regulatory Commission under 10 CFR 32.210 or with an Agreement State; or contain the information identified in 10 CFR 32.210(c). Since you are requesting to use sealed sources for purposes of research and development, please make a list of manufacturer and model numbers of sources you plan to use for this purpose. Alternatively, 10 CFR 30.32(g)(4) states if it is not feasible to identify each sealed source and device individually, the applicant may propose constraints on the number and type of sealed sources and devices to be used and the conditions under which they will be used, in lieu of identifying each sealed source and device.
4. Confirm in your research that you will follow the limitations and conditions as stated in the sealed source and device registry for each respective source.

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. 592913. 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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