



Homeland  
Security

March 9, 2017

United States Nuclear Regulatory Commission  
Region 1  
2100 Renaissance Boulevard; Suite 100  
King of Prussia, Pennsylvania 19406-2713

Re: License Number: 29-13141-06  
Docket Number: 030-30808

Dear Mr. Dennis Lawyer,

This letter is in response to your request for additional information on February 9<sup>th</sup>, 2017 concerning our amendment request dated January 19, 2017. TSL had requested to amend Nuclear Regulatory Commission (NRC) license number 29-13141-06 to allow the authorized use of registered sealed sources for research and development in type, form and quantity stated in sections 6 and 7 in electron capture detector (ECD) or ion mobility spectrometer (IMS) devices that have not been registered with the U.S. Nuclear Regulatory Commission. The questions are shown in italics, with the responses provided in standard font.

- 1. 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.*

Answer: TSL requests to use sealed sources that are registered in the sealed source and device registry for research and development in unregistered devices up to the maximum possession limit of 15mCi per source and 150mCi total nickel 63.

- 2. 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.*

Answer: In accordance with 10 CFR 30.32(g)(4) we plan to possess up to 10 registered sealed sources in unregistered devices for use in electron capture detectors or ion mobility spectrometers.

3. *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.*

Answer: TSL will follow the limitations and conditions as stated in the sealed source and device registry for each respective source.

All sealed sources at the TSL will be inventoried, tracked and leak tested in accordance with license requirements regardless of whether the device has been registered. TSL personnel are qualified by sufficient training and experience and have sufficient facilities and equipment to safely use and handle the radioactive material.

This license covers sealed radioactive sources at the Transportation Security Laboratory located at the William J. Hughes Technical Center in Atlantic City, New Jersey.

If you have questions or need additional information, please contact Colin O'Connor, Safety and Environmental Manager at (609) 813-2820 or by email at [colin.oconnor@hq.dhs.gov](mailto:colin.oconnor@hq.dhs.gov).

Sincerely,



Colin O'Connor  
Safety and Environmental Manager  
Transportation Security Laboratory