



**UNITED STATES
NUCLEAR REGULATORY COMMISSION**
REGION IV
1600 E. LAMAR BLVD
ARLINGTON, TX 76011-4511

May 11, 2017

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SUBJECT: REQUEST FOR ADDITIONAL INFORMATION

The Nuclear Regulatory Commission (NRC) has initiated the technical review of the renewal application of NRC License No. 27-05861-02 and additional information is needed to complete the review process. Please provide your response in a signed and dated letter within 30 days. Make reference to mail control number 593093 in your response.

1. Page 4 of 9 and page 5 of 9 of the renewal application show that the sealed sources listed below have been disposed. Provide copies of decommissioning records for all these sealed sources and copies of their final leak test results.
 - A. Item 6G: Cobalt 60, U.S. Nuclear Model 375, 5 millicuries (1 source) – Disposed on December 14, 2016.
 - B. Item 6I: Cesium 137, U.S. Nuclear Model 375, 300 millicuries (1 source) – Disposed on December 14, 2016.
 - C. Item 6J: Cesium 137, J.L. Shepherd & Associates Model 6810, 10 millicuries (1 source) – Disposed on September 30, 2016.
 - D. Item 6K: Cesium 137, U.S. Nuclear Model CCS-100, 100 millicuries (1 source) – Disposed on September 30, 2016.
 - E. Item 6L: Cesium 137, J.L. Shepherd & Associates Model 6810, 330 millicuries per source and 2 curies total – Disposed on December 14, 2016. Indicate how many Model 6810 sources were disposed and their activities.
 - F. Item 6M: Americium 241, Amersham Model AMC.D2, 30 millicuries per source and 60 millicuries total – Disposed on September 30, 2016. Indicate how many Model AMC.D2 sources were disposed and their activities.

- G. Item 6N: Curium 244, Amersham Model CLCL or Isotope Products Model XFB Series, 100 millicuries per source and 200 millicuries total – Disposed on September 30, 2016. Indicate how many Model CLCL sources were disposed and their activities. Indicate how many Model XFB Series sources were disposed and their activities.
 - H. Item 6O: Cesium 137, AEA Technology QSA Model CDCW556, 9 millicuries (1 source) – Disposed on May 19, 2011.
 - I. Item 6P: Americium 241, AEA Technology QSA Model AMNV.997, 44 millicuries (1 source) – Disposed on May 19, 2011.
2. Condition 6.C. of license amendment number 51 shows authorization for 10 millicuries of Iodine 129 in any form and 10 millicuries of Strontium 90 in any form. Both these radionuclides have half-lives greater than 120 days. The license renewal application did not list Iodine 129 and Strontium 90.
 - A. Indicate if the licensee ever possessed Iodine 129 and Strontium 90 and their physical form (liquid, solid, powder, sealed source). If the answer is that the licensee never possessed these radionuclides then please state so.
 - B. If the answer is that the licensee possessed these radionuclides (in a form other than sealed source) and have disposed of them provide decommissioning records and final status surveys (ambient radiation surveys and wipe tests) of the areas where Iodine 129 and Strontium 90 were stored or used.
 - C. If the answer is that the licensee possessed these radionuclides (in sealed source form) and have disposed of them provide decommissioning records and leak test results for the Iodine 129 and Strontium 90 sealed sources.
 3. Provide a description of the criteria used by the licensee for selecting members to the radiation safety committee.
 4. Describe the criteria the radiation safety committee and/or radiation safety officer will use to review and approve facilities and equipment located in areas where radioactive material will become airborne, taking into consideration description of the ventilation systems, including pertinent airflow rates, pressures, filtration equipment and monitoring systems. Provide procedures for control, review and initial approval of such areas and modifications made to facilities and equipment in such areas.
 5. Licensees who want authorization to calibrate their own radiation monitoring instruments may commit to implement the model procedures published in Appendix H of NUREG-1556, Volume 11, Revision 1, Program-Specific Guidance About Licenses of Broad Scope, or submit their own procedures. The license renewal application indicated that the licensee will calibrate their own instruments.

- A. Submit procedures used by the licensee to perform calibration of radiation monitoring instrumentation.
 - B. If calibration is not performed by the licensee state that: "Instruments will be calibrated by a vendor who is licensed by NRC or an Agreement State to perform instrument calibrations".
 - C. Another alternative is to provide procedures for calibration of radiation monitoring instrumentation in conjunction with a request to have the flexibility to also send instrument to vendors for calibration.
6. Submit procedures used by the licensee to perform leak test and analysis, or as an alternative, state that: "We will implement the model leak test program published in Appendix M of NUREG-1556, Volume 11, Revision 1, Program-Specific Guidance About Licenses of Broad Scope."
 7. The renewal application requests authorization to use portable instruments containing radioactive material. Describe the types of portable instruments and sealed sources that will be used at temporary job sites for analyses, calibration and training purposes. Provide a description of the type of activities that will be conducted at temporary job sites involving analyses, calibration and training.

You can contact me at 817-200-1189 if you have any questions about the contents of this letter.

Thank you for your cooperation.

Sincerely,

/RA/

Roberto J. Torres, M.S., Senior Health Physicist
Materials Licensing and Inspection Branch

Docket: 030-06981
License: 27-05861-02
Control: 593093