

From: [Lawyer, Dennis](#)
To: [Goldberg, Craig S CIV USARMY CECOM \(US\) \(craig.s.goldberg.civ@mail.mil\)](mailto:craig.s.goldberg.civ@mail.mil)
Subject: Department of the Army, Request for Additional Information Concerning Application for a License Renewal, Control 594638, License No. 19-31447-02, Docket No. 03038479
Date: Wednesday, May 31, 2017 3:13:00 PM

Dear Mr. Goldberg,

This is in reference to your application dated April 24, 2017, requesting for renewal to Nuclear Regulatory Commission License No. 19-31447-02, Docket No. 03038479. In order to continue our review, we need the following additional information:

1. You have requested the following items to be removed from your license: Items 6.H, 6.I., 6.M., 6.O. Please provide a letter from the recipient documenting the receipt of these items or other documentation which shows the material was transferred. Also provide the last leak test for those sources if leak test was required. Alternately, you can state that leak tests were taken and no sources were found to be leaking prior to transfer.
2. The sealed source and device registry for Table 1, Element I in your application states that the device may contain four sources. However, your application states that it may contain five sources. Please explain why the your model is different than the as stated in the sealed source device registry.
3. The application did not discuss records of decommissioning. As stated in NUREG-1556, Volume 11, Rev. 1, Consolidated Guidance About Materials Licenses Program-Specific Guidance About Licenses of Broad Scope, section state the following: "Pursuant to 10 CFR 30.35(g), 10 CFR 40.36(f), and/or 10 CFR 70.25(g) and 10 CFR 70.51(b)(3), we will maintain records important to decommissioning and transfer these records to an NRC or Agreement State licensee before licensed activities are transferred or assigned in accordance with 10 CFR 30.34(b), 10 CFR 40.46, and/or 10 CFR 70.36. Furthermore, pursuant to 10 CFR 30.51(f), 10 CFR 40.61(f), and /or 10 CFR 70.51(a)(3), prior to license termination, we will forward the records required by 10 CFR 30.35(g), 10 CFR 40.36(f), and/or 10 CFR 70.25(g) to the appropriate NRC Regional Office." Please make this statement.
4. Please confirm that your Certification of Financial Assurance dated September 4, 2013 [ML13270A152] and your Statement of Intent dated October 6, 2011 [ML112920545] are still valid and supports the financial assurance requirement for this license.
5. The application does not appear to state the criteria to become a member of the Radiation Safety Committee (RSC) and the number of RSC members that constitute a quorum. NUREG-1556, Volume 11, Revision 1, states in section 8.7.2 to provide the criteria used for selecting members of the RSC, including what members and the number of members constituting a quorum. Please provide this information.
6. The application does not appear to describe the procedures for the RSC to approve new uses. NUREG-1556, Volume 11, Revision 1, states in section 8.7.2 to provide criteria and procedure describing the approval process used by the RSC for authorizing new uses. Please provide the criteria and procedure to describe the approval process for authorizing new uses.
7. The application does not appear to state the duties and responsibilities of the Radiation Safety Officer (RSO). NUREG-1556, Volume 11, Revision 1, states in section 8.7.3 to submit a statement delineating the RSO's duties and responsibilities. Please submit this statement of RSO duties and responsibilities.
8. The application does not appear to have submitted the RSO delegation of authority. NUREG-1556, Volume 11, Revision 1, states in section 8.7.3 to submit a radiation

safety officer delegation of authority memorandum signed by the licensee's executive management. Please submit this memorandum for the RSO's delegation of authority.

9. NUREG-1556, Volume 11, Revision 1, states in section 8.8 to submit a description of the radiation safety training program developed for each group of workers, including: topics covered, qualifications of the instructors, method of training, method for assessing the success of the training, and the frequency of training and refresher training. In your application, Supplement D, it states that annual training of radiation workers is conducted by the RSO or a qualified designee. Please describe the topics covered, the method of training, and the method for assessing the success for the training. Additionally, describe the program for other groups of workers that get trained.
10. The application does not appear to describe the procedures for the RSC to approve new facilities. NUREG-1556, Volume 11, Revision 1, states in section 8.9 to describe the criteria the RSC will use to review and approve facilities and equipment (research laboratories, iodination facilities, waste storage facilities, survey and counting equipment, etc.). Also describe the procedures for control, review, and approval of significant facilities or equipment modifications. Please provide this information.
11. The application does not appear to address a commitment to follow the National Source Tracking System. NUREG-1556, Volume 11, Revision 1, says in section 8.9 to make the statement, "We will comply with the National Source Tracking System (NSTS) reporting requirement as described in 10 CFR 20.2207." Please make this statement.
12. It did not appear that you fully described your safe use of radionuclides and emergency procedures. NUREG-1556, Volume 11, Revision 1, says in section 8.10.6 to submit procedures for safe use of radionuclides and emergencies. Submissions should include procedures for maintaining security of licensed radioactive materials. As an alternative, state, "We will adopt the procedures for the safe use of radionuclides and emergencies as published in Appendix K of NUREG-1556, Volume 11, Revision 1, 'Consolidated Guidance About Materials Licenses: Program-Specific Guidance About Licenses of Broad Scope.'" Please provide the procedures or make this statement.
13. Your application does not appear to contain information about performing surveys. NUREG-1556, Volume 11, Revision 1, says in section 8.10.6 to submit procedures to evaluate radiological hazards, both external and internal. As an alternative, the applicant may state, "We will survey our facility and maintain contamination levels and perform bioassays of occupationally exposed workers in accordance with the survey frequencies and contamination levels published in Appendix L of NUREG-1556, Volume 11, Revision 1, " Consolidated Guidance About Materials Licenses: Program-Specific Guidance About Licenses of Broad Scope.'""
14. Your application does not appear to contain information about performing the leak tests. NUREG-1556, Volume 11, Revision 1, says in section 8.10.6 to submit leak test procedures. As an alternative, the applicant may state, "We will implement the model leak test program published in Appendix M of NUREG-1556, Volume 11, Revision 1, " Consolidated Guidance About Materials Licenses: Program-Specific Guidance About Licenses of Broad Scope.
15. Your license currently authorizes decay-in-storage before disposal. Your application did not address this as part of your license renewal. NUREG-1556, Volume 11, Revision 1, says in section 8.11 to provide procedures for any of the methods

described in section 8.11. Please provide your procedures for release of material after decay-in-storage.

16. Please describe what service associated with analysis of test samples you provide.

Is service more than leak testing and if so what types of analysis is being provided.

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. 594638. 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.

[optional] 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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