

From: [Lawyer, Dennis](#)
To: Kovatsc@georgetown.edu
Subject: Georgetown University, Request for Additional Information Concerning Application for a License Amendment and Financial Assurance, Control 599816 and 600182, License No. 08-03114-05, Docket No. 03013627
Date: Wednesday, July 19, 2017 11:08:00 AM

Dear Ms. Kovats,

This is in reference to your letter dated June 7, 2017, requesting for an amendment and financial assurance for Nuclear Regulatory Commission License No. 08-03114-05, Docket No. 03013627. In order to continue our review, we need the following additional information:

1. It item 1 of your letter, you state that you wish to reduce the possession limit as indicated. For item C, you did not specify the total amount of material requested, only the amount per radionuclide. Additionally, the amount is at least twice the amount currently requested and does not appear to be a reduction. Please restate the amount of material you wish for item C.
2. A Certification of Financial Assurance Attachment A was submitted to match the amendment request. Please resubmit the Attachment A of the Certification of Financial Assurance for the total amount of Item C determined in the question above.
3. Prior to termination of a license, 10 CFR 30.35(g), 30.36(k)(4) and 30.51; 40.36(f), 40.42(k)(4) and 40.62; and 70.25(g), 70.38(k)(4) and 70.51 require that you submit to the NRC certain records. 10 CFR 30.35 (g), 40.36(f), and 70.25(g) states that you must keep the records important to decommissioning in paragraph b. below until the area is released for unrestricted use. Since you are applying for release of the S-Level of the Lombardi Cancer Center, 3800 Reservoir Road, NW., Washington, D.C., please submit the records concerning the S-Level of the Lombardi Cancer Center, or explain why such records are not applicable.
 - a. for unsealed materials with half-lives greater than 120 days, records for disposal made pursuant to 10 CFR 20.2002 (alternate disposal procedures, including burial authorized prior to January 28, 1981), 20.2003 (disposals to the sanitary sewerage system), 20.2004 (incineration of wastes), 20.2005 (disposal of specific wastes including liquid scintillation cocktail and animal tissue), and 20.2103(b)(4), evaluations of effluent releases.
 - b. records important for decommissioning as described in 30.35(g), 40.36(f) and 70.25(g). Examples of such records include but are not limited to: records of contamination, identifying the radionuclides, quantities and concentrations; as-built drawings and modifications of structures and equipment in restricted areas and locations of inaccessible contamination such as buried pipes; a single list, updated at least every 2 years, of areas to which access is limited for the purpose of radiation protection (restricted areas); and records related to the provision of financial assurance.

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. 599816 and 600182. 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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