



UNITED STATES
NUCLEAR REGULATORY COMMISSION

REGION III
2443 WARRENVILLE RD. SUITE 210
LISLE, IL 60532-4352

AUG 02 2017

Glenn P. Sullivan
Corporate Radiation Safety Officer
Cardinal Health 414, LLC
7000 Cardinal Place
Dublin, OH 43017

Dear Mr. Sullivan:

Enclosed is Amendment No. 52 to your NRC Material License No. 34-29200-01MD in accordance with your April 28, 2017 (ML17124A299) request to update the diagrams for your Swartz Creek, Michigan and Laurel, Delaware locations of use.

Please review the enclosed document carefully and be sure that you understand all conditions. If there are any errors or questions, please notify the U.S. Nuclear Regulatory Commission, Region III office at (630) 829-9887 so that we may provide appropriate corrections and answers.

This letter also refers our August 1, 2017 discussion concerning the receipt of radioactive packages in vestibules, not labeled as restricted areas in the diagrams contained in the above referenced letter. We have noted that your August 1, 2017 letter confirmed that posting requirements in Title 10 of the *Code of Federal Regulations* Part 20 would be met. As discussed, additional information is needed to clarify how the posting requirements for areas where incoming packages are received and stored would be met.

Please provide additional information within 30 days of the date of this letter, as described below:

As we discussed, the term "restricted area" as defined in 10 CFR 20.1003 appears to apply to the vestibule areas described above, as radioactive materials packages are delivered there and left unattended "after hours," for any duration. Accordingly, the NRC understands that this area should be designated, posted, and controlled appropriately.

Pursuant to 10 CFR 20.1902(e) and 10 CFR 20.1903, it appears that, when packages of radioactive materials are left in the vestibule "after hours," then the vestibule would be required to have the "Caution, Radioactive Materials" posting, especially because the quantities of licensed material in the packages could easily exceed the thresholds in 10 CFR 20.1902 and "10 times the quantity of such material specified in appendix C to part 20." It also appears that the "Exceptions to posting requirements" in 10 CFR 20.1903 would not apply.

These regulations are available on our website at:
<http://www.nrc.gov/reading-rm/doc-collections/cfr/part020/>

The enclosed document contains sensitive security-related information.
When separated from this cover letter this letter is uncontrolled.

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To clarify how the vestibule areas will meet the requirements outlined in 10 CFR Part 20. Further, please describe how after-hours delivery persons, especially those delivering radioactive materials packages, will be permitted access to the drop-off area in the vestibule for packages but still be prevented from accessing the rest of the licensed and restricted space in the laboratory. If any changes are made to one or both of the facility diagrams, please include those updates as part of your response.

Please submit your response under a signed and dated letter and reference Mail Control Number 594669 as part of your response. You may submit your response via facsimile to 630-515-1078, via regular mail, or as a pdf file attached to an email addressed to me at sara.forster@nrc.gov. Do not hesitate to email or call (630-829-9892) if you have any questions or need additional time to respond.

You will be periodically inspected by NRC. Failure to conduct your program in accordance with NRC regulations, license conditions, and representations made in your license application and supplemental correspondence with NRC will result in enforcement action against you. This could include issuance of a notice of violation, or imposition of a civil penalty, or an order suspending, modifying or revoking your license as specified in the General Statement of Policy and Procedure for NRC Enforcement Actions. Since serious consequences to employees and the public can result from failure to comply with NRC requirements, prompt and vigorous enforcement action will be taken when dealing with licensees who do not achieve the necessary meticulous attention to detail and the high standard of compliance which NRC expects of its licensees.

The NRC's Safety Culture Policy Statement became effective in June 2011. While a policy statement and not a regulation, it sets forth the agency's *expectations* for individuals and organizations to establish and maintain a positive safety culture. You can access the policy statement and supporting material that may benefit your organization on NRC's safety culture Web site at <http://www.nrc.gov/about-nrc/regulatory/enforcement/safety-culture.html>. We strongly encourage you to review this material and adapt it to your particular needs in order to develop and maintain a positive safety culture as you engage in NRC-regulated activities.

NRC's Regulatory Issue Summary (RIS) 2005-31 provides criteria to identify security-related sensitive information and guidance for handling and marking of such documents. This ensures that potentially sensitive information is not made publicly available through ADAMS, the NRC's electronic document system. Pursuant to NRC's RIS 2005-31 and in accordance with Title 10 of the *Code of Federal Regulations* (CFR) Section 2.390, the enclosed license document is exempt from public disclosure because its disclosure to unauthorized individuals could present a security vulnerability. The RIS may be located on the NRC Web site at: <http://www.nrc.gov/reading-rm/doc-collections/gen-comm/reg-issues/2005/ri200531.pdf> and the link for frequently asked questions regarding protection of security related sensitive information may be located at: <http://www.nrc.gov/reading-rm/sensitive-info/faq.html>.

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A copy of this letter will be available electronically for public inspection in the NRC Public Document Room or from the NRC's Agencywide Documents Access and Management System (ADAMS), accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html>.

Sincerely,



Sara A. Forster, M.S.
Health Physicist
Materials Licensing Branch

License No. 34-29200-01MD
Docket No. 030-36973

Enclosure: Amendment No. 52