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**To:** [christina.kaba@fmc.com](mailto:christina.kaba@fmc.com)  
**Cc:** [PETRILLO, KELLY L](mailto:PETRILLO, KELLY L)  
**Subject:** revised Request for Additional Information  
**Date:** Tuesday, September 19, 2017 8:53:00 AM

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FMC Corporation  
License No. 37-35439-01  
Docket No. 030-39063  
Control No. 600409

To: Christina Kaba, Director, EH&S, FMC

From: Betsy Ullrich, Senior Health Physicist, NRC Region I

We have the following questions regarding you application for a new license:

1. Please provide further detail of the authorized locations of use you are requesting in the application. Your application refers to the "Stine" portion of the Stine-Haskell Research Center. It is not clear if this is a single building, or a portion of a building, or a portion of the site. The application also refers to "...23 existing commissioned radioactive materials storage/use areas..." We do not usually authorize multiple licenses at the same address, without a clear understanding of which licensee is responsible for which part(s) of the facility, and how access between the licensees is controlled with respect to the storage and use of licensed materials.
  - a. Provide more details regarding the facilities at 1090 Elkton Road which will be authorized under this license. Explicitly state which portions of the site will be under the control of FMC Corporation if that address will be shared with another company. If licensed activities are to be limited to specific buildings rather than authorizing use anywhere at that address, please designate those buildings.
  - b. If licensed activities will take place at the site or in a building in which another licensee also is authorized to perform licensed activities, describe the controls you will have in place to keep your activities separate.
  - c. Confirm if you are requesting to restrict your use to the 23 existing areas. If so, state the building and room number, or other appropriate designation, of those areas.
2. Confirm that you will develop, implement and maintain procedures for ensuring accountability of licensed materials at all times.
3. Item 11 of your application includes a section "Disposal as Normal Waste", which states that "Notwithstanding 10 CFR 20.2001, the licensee may dispose of hydrogen-3 and carbon-14 in plant and soil material as normal waste. If the plant and soil material contain less than 0.002 microcurie per gram averaged over the weight of the plant and soil material, and the quantity per disposal does not exceed 100 microcuries for hydrogen-3 and 10 microcuries for carbon-14." This is a

special license condition currently listed on the DuPont license that currently authorizes activities at the address you are planning to use. Such license conditions are approved on a case-by-case basis. If you wish this authorization, you must submit all the information requested in 10 CFR 20.2002 to support your request for this special license condition. Please submit this information, or confirm that you do not require this authorization.

4. We cannot issue a new license unless the financial assurance is in place. The cost estimate is acceptable. Please let us know how long you expect it to take to submit the financial assurance instrument.

Please respond with a signed letter in hard copy, or a pdf or fax of that signed letter. If we do not receive a response within 30 days, we may consider that you have abandoned your application for a license. . If you have any questions, please contact me by email or at the numbers shown below.

Thanks,  
Betsy

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