



National Institutes of Health  
Bethesda, Maryland 20892  
www.nih.gov

January 19, 2017

U.S. Nuclear Regulatory Commission  
Division of Radiation Safety and Safeguards  
Region I  
2100 Renaissance Blvd.  
King of Prussia, PA 19406

*Br. 2  
03008478*

Ref: License #19-00296-17

Dear Sir or Madam:

This is to request an exemption from 10 CFR 71.5 for an upcoming transport of a [REDACTED] quantity of radioactive material. The National Institutes of Health (NIH) would like to utilize 49 CFR 171.1(d)(5) for allowing a self-shielded irradiator move by a government employee solely for noncommercial purposes. This request is being made due to the circumstances of the very short distance involved, the uncertain availability of a Type B transport container, and the anticipated great cost of a transport container should one be available. Furthermore, the NIH is in the unique position of easily being able to meet the conditions of 49 CFR 171.1(d)(5), since we are a federal facility. The below information is provided for your consideration of the irradiator relocation details:

The irradiator will be transported a distance of 0.3 miles, from [REDACTED] MD to [REDACTED] MD. The attached map demonstrates the intended route of transport. The irradiator will be moved through a [REDACTED] across [REDACTED] which is a [REDACTED] public road, and through another [REDACTED] to reach its destination. The public road, [REDACTED] will be briefly closed off to traffic by the Montgomery County Police Department (MCPD) while the irradiator is transported across.

Irradiator information:

[REDACTED]

The irradiator will be transported as-is in its shielded and intact housing and the source rod will be secured in place to prevent movement during transport. An NRC licensed service provider will prepare and secure the irradiator on a forklift capable of handling a load of [REDACTED]

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NRC/STONI MATERIALS-002

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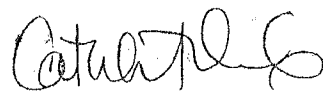
federal government employee who is forklift-certified will drive the forklift to move the irradiator along its transport route. Multiple armed officers from the MCPD will be providing security during the loading, transport, and unloading process. The MCPD serves as a Local Law Enforcement Agency to the NIH and officers have participated in multiple joint training exercises, in addition to actual irradiator moves, with the NIH in the past.

Shipment information will be coordinated with the governor's office per 10 CFR 37.75(a) and advance notification will be given to the NRC and governor's office following the requirements listed in 37.77.

The move will take place early in the day on a [REDACTED] to be determined. NIH will provide a health physicist from the Division of Radiation Safety (DRS) who will be present during the entire move. NIH will utilize MCPD officers for physical protection during the irradiator movement. MCPD officers will maintain direct visual contact with the irradiator on the forklift during loading, movement, and offloading, in addition to posting unmarked patrols throughout the area to eliminate vehicular traffic in the parking lots and on [REDACTED]. Officers will use encrypted secure radio communication throughout the move and will directly communicate with all other individuals involved with the project. Personal radiation detectors (PRDs) and ion chambers will be used by DRS staff, the service provider, and MCPD officers throughout the irradiator move.

Written normal and contingency procedures will be provided by DRS staff to the government employee forklift driver, the service provider, and all onsite police officers responsible for providing protection during the irradiator move.

I hope that you can offer your concurrence to this exemption request at your earliest convenience. If you have any questions, please feel free to contact me at 301-594-1303 or via e-mail at [cribaudo@nih.gov](mailto:cribaudo@nih.gov).



Catherine A. Ribaudo  
Radiation Safety Officer, NIH

cc: Dr. Brad Wood, Chairman, NIH Radiation Safety Committee

**Transport Route – Map Removed**