

From: [Ullrich, Elizabeth](mailto:Ullrich,Elizabeth)
To: chris@ccirradiator.com
Subject: your request for an NRC license
Date: Tuesday, November 07, 2017 1:34:00 PM

C&C Irradiator Service, LLC
License No. 08-35447-01
Docket No. 030-39072
Control No. 601392

Chris,

I spoke with Chad yesterday but do not have an email address for him. You are listed as contact, and I do have some additional questions:

1. Item 5.a. of your application requests five radionuclides to be authorized on your license.
 - a. Confirm you intended to request cobalt-60, rather than cobalt-50 as listed on your application.
 - b. Section 8.5.1 of NUREG-1556, Volume 18, Revision 1, "Program Specific Guidance About Service Provider Licenses" (NUREG-1556, Vol. 18) requires that you specify (1) the maximum activity for each source, and the maximum activity total to be possessed or used at any one time; and (2) the manufacturer/.distributor and model number for the sources, or the Sealed Source and Device (SSD) registration certificate number for the sources. Please provide this information.
 - c. Section 10.3 of your Radiation Safety Manual refers to returning leak test samples to your office; Section 4.D. of your QA Procedures state that you will maintain NIST-traceable radiation source standards in-house; and Section 10.4 refers to performing surveys at your facility and inventory of sources. If you will possess any samples, calibration or check sources, or other licensed materials at your own facility, please provide the type, form and quantity of those materials to be listed on the license for use at your facility; and a facility diagram that shows where licensed materials will be used and stored as requested in Section 8.9 of NUREG-1556, Vol. 18. If you will possess materials at your facility, you also should provide information related to waste disposal.
2. Item 6 of your application states that you plan to collect leak test samples, and perform analysis of test samples for customers. Confirm if the leak tests and sample analysis is limited to routine servicing of the irradiators, or if it also includes collection of leak test samples for customers as a separate service (such as by providing them leak test kits, and analyzing the returned samples at your facilities). Also, if the analysis of test samples is other than the leak tests, provide additional information about the types of samples to be analyzed.
3. Section 3.0 of your Radiation Safety Manual states that certain areas "should" be posted. Confirm that areas will be posted if required pursuant to 10 CFR 20.1902 unless they meet one of the exceptions in 10 CFR 20.1903

As I discussed with Chad yesterday, a pre-licensing visit will be needed. You should be contacted by Steve Courtemanche of this office shortly to schedule that visit.

In addition, it is not necessary for you to submit your program for compliance with Part 37 in your application. This will be reviewed during inspection. For your information, here is a link to a recent Regulatory Issue Summary related to implementation of Part 37 by Service Provider licensees:

RIA 2017-02 APPLICABILITY OF TITLE 10 OF THE *CODE OF FEDERAL REGULATIONS*
PART 37 TO NON-MANUFACTURING AND DISTRIBUTION SERVICE PROVIDER
LICENSEES

<https://www.nrc.gov/docs/ML1702/ML17023A159.pdf>

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. Please reply from within 30 calendar days from the date of this e-mail. If we do not hear from you within 30 days, we will assume you do not wish to pursue this application.

If you have any questions, please contact me as shown below.

Betsy

Betsy Ullrich, Senior Health Physicist
USNRC Region I
2100 Renaissance Boulevard, Suite 100
King of Prussia, PA 19406
610-337-5040 (office)
240-704-4575 (cell)
Elizabeth.ullrich@nrc.gov