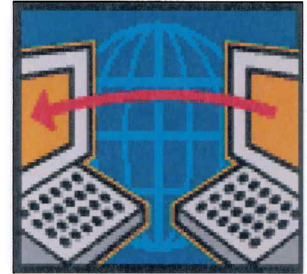




UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
REGION IV  
1600 EAST LAMAR BLVD  
ARLINGTON, TEXAS 76011-4511

# EMAIL



**Name:** Blake Vance/Ronald Frick License: 53-00515-01  
**Organization:** Hawaii Agriculture Research Center Docket: 030-06839  
**Phone:** 808-621-1201/808-373-7009 Control: 601657  
**E-mail Address:** [BVance@harc-hspa.com](mailto:BVance@harc-hspa.com)/[rfrick@gammacorp.com](mailto:rfrick@gammacorp.com)  
**From:** Jacqueline D. Cook  
**Date:** January 26, 2018  
**Subject:** Application dated October 31, 2017 for Renewal Application  
**Pages:** 3

Mr. Vance/Mr. Frick:

Per your application dated October 31, 2017, the items on the next page are deficiencies which require your response. **Please respond to this e-mail by Monday, February 12, 2018.** Our fax number is (817) 200-1263. Please provide a response in a signed and dated letter in pdf format when responding via email. My email address is [Jackie.Cook@nrc.gov](mailto:Jackie.Cook@nrc.gov). When responding to this e-mail, please include the docket and control numbers located at the top of this page.

Please note that your renewal application was reviewed using Policy and Guidance Directive PG 1-27, "Reviewing Requests To Convert Active Licenses To Possession-Only Licenses", specifically Enclosure 1 (Please see attached).

Thanking you in advance for your cooperation, assistance, and prompt response in this matter.

*/RA/*  
Jacqueline D. Cook  
Senior Health Physicist

**PUBLIC**

- Immediate Release  
 Normal Release

**NON-PUBLIC**

- A.3 Sensitive-Security Related  
 A.7 Sensitive Internal  
 Other:

Reviewer: JDC Date: 1/26/18

1. In looking at the program scope from the last inspection dated September 23, 2016 (NRC Form 591M Part 3), it appears that only small amounts of carbon-14 and tritium and in reviewing you renewal letter dated June 30, 2015 inventory list, this material and exempt quantities of nickel-63 are in storage and in sealed steel drums ready for disposal.

Please note that your current license authorizes phosphorus-32, phosphorus-33, sulfur-35, and chromium-51 on your license in Items 6.A., 6.B., 6.E., and 6.F., respectively.

Please clarify this discrepancy.

2. Please submit a detailed description of all efforts made to dispose of the licensed material, including telephone calls, letters, facsimiles, personal contacts, etc.
3. Please note that in Item 3 of your renewal application dated October 31, 2017, you listed the location of storage authorized in Condition 10.A. of your license; however, currently your license authorizes another storage location in Condition 10.B. of your license.

In addition, please note that in the program scope from your routine inspection on July 18, 2013 (NRC Form 591M Part 3), the storage location in Condition 10.B. of your license is described as where you have 6 drums of radioactive waste and a trash compactor that is contaminated which you have packaged for disposal.

Please clarify this discrepancy.

4. Please describe an acceptable accountability program for assuring that the licensed material remains in secure storage and is not used (inventory at least annually). The program provides reasonable assurance that the licensee will maintain security.
5. Please describe all planned changes to limit/decrease the licensee's radiation safety program as a result of placing the licensed material in storage. These changes may include, but are not limited to, the following:

- A. Dosimetry services
- B. Worker training programs
- C. Instrument calibration service
- D. Inventories
- E. Internal audits
- F. Maintenance and visual inspection of equipment and facilities
- g. Maintenance of records

6. If applicable, describe a commitment to leak test sealed sources and devices containing sealed sources at least once every 10 years and within 6 months before use or transfer to an authorized recipient.
7. Please commit: "The licensee will continue to take all actions within its ability to dispose of its material and notify NRC within 30 days if disposal is achieved."