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**To:** [tamartinson@alaska.edu](mailto:tamartinson@alaska.edu)  
**Cc:** [Browder, Rachel](#); [Hammond, Michelle](#)  
**Subject:** UAF license amendment request  
**Date:** Friday, March 23, 2018 6:33:40 AM  
**Attachments:** [UAF Safety Evaluation Report.pdf](#)

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Tracey,

This email is to document our call regarding University of Alaska, Fairbanks (UAF) license amendment request dated December 13, 2016 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML16356A229) and May 5, 2017 (ADAMS Accession No. ML17128A506). The amendment request provided dose modeling results based on sample analyses that indicated some areas at the Large Animal Research Station (LARS) would not meet unrestricted release criteria under 10 CFR 20.1402, until 2020. Accordingly, you requested that the LARS site be released for restricted use in the meantime, so that three pens at LARS which did meet unrestricted use criteria could be used for other animal operations not involving licensed materials, including meat production.

The NRC performed independent analyses that provided dose results that were lower than the values included in your submittal and concluded that, based on the characteristics of the site, the University of Alaska, Fairbanks would not have to wait until 2020 to meet the NRC's 10 CFR 20.1402 unrestricted use dose requirements. As a result of our analysis, we cannot take an action on your license amendment request for restricted use as submitted. We suggest that you supersede your license amendment request with a request for unrestricted use of the LARS facility, referencing the conclusions in the enclosed Safety Evaluation Report (SER) (ADAMS Accession No. ML18039A825). The enclosed SER documents the NRC's evaluation of the LARS facility and its environmental characteristics, the dose modeling performed for the LARS facility, and the conclusion of the unrestricted use criterion for the LARS facility.

Please note that while the LARS facility remains as a location of use on the University of Alaska, Fairbanks' NRC radioactive materials license, it would preclude selling the meat of animals raised at the LARS site for human consumption, according to 10 CFR 20.2005(b). However, once the LARS site has been removed from your license, then the UAF may relocate its current reindeer herd from its Experimental Farm to LARS for husbandry studies and for research on meat production, including human consumption of meat. Please recognize that UAF would still have to meet any food production requirements from the State of Alaska as well as agencies like the FDA.

Finally, in your license amendment request, you included the location of one land burial of radioisotopes, which was authorized at the time by the NRC regulations under 10 CFR 20.304, "Disposal by burial in soil" (deleted January 28, 1981). This burial site included three 55-gallon drums, a large footlocker, and 12 smaller footlockers, containing vials of tritium, carbon-14, selenium-75, chromium-51, ruthenium-103, iodine-125, sulfur-35, cerium-141, and scandium 46. The burial occurred in an ice lens located on the southern edge of the property, in an area that is not currently used for animals, and is separate from the LARS site. Specifically, 10 CFR 30.36 timeliness requirements do not apply to your previous land burial site which were terminated under your NRC license, provided those operations were not continued under your current NRC license. Once you have decided to

pursue decommissioning for this previously authorized burial site, then please submit a Decommissioning Plan in accordance with NUREG-1757, Consolidated Decommissioning Guidance.

If you have any questions, please let me know.

Sincerely,  
Austin Roberts

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