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To: ["radiation@montana.edu"](mailto:radiation@montana.edu)
Cc: [Browder, Rachel](#); [Hammond, Michelle](#); [Kellar, Ray](#)
Subject: Summary of phono conversation regarding release of Molecular Biology Building at Montana State
Date: Wednesday, April 18, 2018 10:39:00 AM

Nick,

The following summarizes our phone conversation on April 16, 2018 regarding the planned decommissioning and release for unrestricted use of the Molecular Biology Building (MBB) at Montana State University (MSU) in Bozeman, MT. The information should be documented or clarified further as part of the decommissioning package maintained by the licensee.

- Confirmed that "Main Campus" per License Condition 10 includes all locations in and around Bozeman, including the MBB.
- Clarified that MSU is currently the lessee for its spaces in the MBB (960 Technology Blvd). The licensee is unaware of any isotope use by other (non-MSU) occupants of the building.
- MBB activities will be relocated to other buildings that are already included in the MSU license.
- No MSU equipment will be left behind at the MBB when the lease ends.
- Confirmed that three of the 16 rooms where RAM was used in the MBB do not appear in the 2014 decommissioning funding plan. The list of 16 MBB rooms in the licensee's February 24, 2018 letter to the NRC is the most complete listing of affected spaces in the MBB.
- The licensee does not plan to conduct any use of radioactive materials at the new building they have purchased, next door to the MBB (2155 Analysis Drive, formerly home to Takeda Vaccines).
- Licensee stated that no sink disposal of RAM was conducted at MBB, with the exception of instrument washing. Licensee agreed that surveying sink traps would be conducted as part of final survey.
- Licensee agrees to maintain the following documentation as part of the decommissioning package:
 - o Scaled maps of MBB rooms where RAM was used to include the locations of items such as sinks, hoods, drains, and cabinets; also including floor maps to document the specific location of the rooms.
 - o Leak test results of sealed sources that had been used in the facility, such as the gamma irradiator, which was moved out of the MBB in July 2017.
 - o Copies of disposal / transfer of unsealed materials, if available or applicable
 - o Copies of last surveys that were performed in the MBB
- Staff recommended that the MARSSIM methodology be used when planning and implementing the final status survey, particularly regarding the number of wipe tests/measurements in each Survey Unit (~1000 m²).
- Staff agreed that the instrumentation listed by the licensee in their preliminary final status survey plan would be appropriate and sufficient.
- Staff agreed that performing wipe tests, analyzed by MSU's liquid scintillation counter (LSC), would be appropriate for the final survey. Staff agreed that the licensee would not have to obtain a new scintillation probe for the purpose of counting Fe-55, and that LSC would be sufficient.
- The licensee should specifically document the fraction of removable surface contamination to clearly demonstrate that it is less than 10%. Please refer to the note under Table B-1, NUREG-1757, Volume 1, Revision 2.
- The licensee should consider using the Screening Levels for Unrestricted Use (Table B-1, NUREG-1757, Volume 1, Revision 2) when performing the non-parametric Sign Test when determining the number of data points to collect/analyze, so the number of data points would be reasonable value.

We understand that MSU is a Type A Broad Scope licensee, and as such is authorized to internally establish, terminate, and resume uses of licensed materials at separate locations under your license. Since the location of MBB is not specifically listed on your license, but is captured under the Main

Campus of MSU, then a license amendment is not required as specified in the current guidance provided in NUREG-1757, Volume 1, Revision 2, Section 15.5.3. As we discussed, the agency is currently reviewing this particular guidance, so expectations and guidance may be different in the future.

If you have any questions, please contact either myself at the number below, or Rachel Browder at (817) 200-1452.

Sincerely,

Austin Roberts
Health Physicist
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(817) 200-1209