



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
REGION I  
2100 RENAISSANCE BLVD.  
KING OF PRUSSIA, PA 19406-2713

May 1, 2018

Wayne R. Munns, Jr.,  
Director, Atlantic Ecology Division  
U.S. Environmental Protection Agency  
27 Tarzwell Drive  
Narragansett, RI 02882-1154

SUBJECT: U.S. ENVIRONMENTAL PROTECTION AGENCY, REQUEST FOR  
ADDITIONAL INFORMATION, MAIL CONTROL NO. 602461

Dear Mr. Munns:

This is in reference to your letter dated February 12, 2018, requesting to renew NRC License No. 38-11957-01. In your letter you requested: (1) an extension of your NRC License, (2) a change of Radiation Safety Officer (RSO) from Dr. Robert Burgess to Mr. Gino Begluitti, and (3) the removal of Nickel-63 from the authorized materials list of your license. On April 27 and April 30, 2018, I discussed several aspects of the application with Mr. Gino Begluitti, your contact for this application. The questions that were discussed are documented below.

In order to continue our review, we need the following additional information:

1. In your February 12, 2018 letter, you stated that you experienced delays resulting in the need for a license extension, had conducted a partial MARSSIM survey of approximately 50% of the areas of concern, completed a Historical Survey, and are currently developing closure plans, in accordance with NUREG-1757.
  - a. According to 10 CFR 30.36(h), decommissioning of the site or separate building or outdoor area shall be completed as soon as practicable but no later than 24 months following the initiation of decommissioning. We expected that the decommissioning of your facility would have been completed no later than December 15, 2015. Please describe the reason for the significant delays.
  - b. Independently from your response to this request for additional information, and under a separate cover, submit a decommissioning plan to the NRC no later than June 15, 2018. Refer to 10 CFR 30.36(g) and NUREG-1757, *Consolidated NMSS Decommissioning Guidance*, Vol. 2, Rev. 1, dated, September 2006. <https://www.nrc.gov/reading-rm/doc-collections/nuregs/staff/sr1757/> for details.
2. In your cover letter, dated February 12, 2018, you provided Attachment A for specific responses to NRC Form 313, *Application for Materials License* Items 5 through 11. We noted two sections that need attention. Please check the appropriate item in Box 1 to indicate the appropriate action request, complete Box 13, "Certification", and re-submit an amended NRC Form 313.

3. In Item #6 of your letter, dated February 12, 2018, you stated that Items #5 A, B, C, and D will be used in laboratory studies. Please describe the laboratory studies for which you are currently using the licensed byproduct materials, and include the length of time you have been using them.
4. In Item #10, dated February 12, 2018, you stated that your facility has not had any uses of radioactive materials since November 2010. However, in your Item #6, you stated that you are using radioactive materials for laboratory studies. Please resolve the two contradictory statements and provide a clear statement of the intended use of the radioactive materials regarding laboratory studies.
5. In Item #11, dated February 12, 2018, you stated that all known contaminated waste has been removed from the facility. Please provide copies of the waste manifests for all the waste that has been removed.

Through a review of NRC inspection records from 2014 and 2016, we also identified the following for which we need additional information:

6. We understand that you disposed of your unsealed byproduct materials, tritium, and carbon 14. Please provide the waste manifests for these radioactive materials.
7. We understand that you possess four gas chromatographs and one liquid scintillation counter that contain generally licensed sources. Please indicate whether or not you currently possess this equipment and when you will either transfer or dispose of them under the requirements of 10 CFR 31.5. Please provide the associated documentation to demonstrate either transfer or disposal of this equipment. Note: This equipment must be either properly transferred or disposed of prior to termination of your license. Refer to 10 CFR 30.36(k) for details.

We will continue our review upon receipt of this information. Please reply to my attention at:

Laurie A. Kauffman  
Mail Control No. 602461  
USNRC, Region I  
Division of Nuclear Materials Safety  
2100 Renaissance Boulevard  
King of Prussia, PA 19406

In order to continue prompt review of your application, we request that you submit your response to this letter within 30 calendar days from the date of this letter.

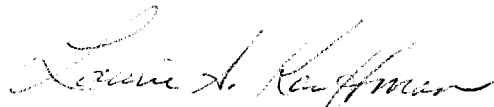
An electronic version of the NRC's regulations is available on the NRC Web Site at: [www.nrc.gov](http://www.nrc.gov). Additional information regarding use of radioactive materials may be obtained on the NRC Web Site at: <http://www.nrc.gov/materials/miau/mat-toolkits.html>. This site also provides the link to the toolbox for updated information on the revised regulations for naturally-occurring and accelerator-produced radioactive materials (NARM).

In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice," a copy of this letter will be available electronically for public inspection in the NRC Public Document Room or from the NRC's document system (ADAMS). ADAMS is accessible from the NRC Web Site at: <http://www.nrc.gov/reading-rm/adams.html>. Please be aware that you may request that certain portions of your submittal to NRC be withheld from public disclosure as proprietary information. To do this, you must execute an affidavit as specified in 10 CFR 2.390. You must list all portions that you wish to be held proprietary, along with your reasoning as to why that is appropriate. While it is allowable, please refrain from submitting proprietary information in support of a license unless necessary. Keep in mind that all NRC licenses are considered to be in the public domain, and therefore may be viewed by any member of the public who requests to see them.

If you have any questions regarding this request for additional information, please contact me at 610-337-5323 or via electronic mail at [Laurie.Kauffman@nrc.gov](mailto:Laurie.Kauffman@nrc.gov).

Thank you for your cooperation.

Sincerely,



Laurie A. Kauffman, Health Physicist  
Decommissioning, ISFSI, and Reactor HP  
Branch  
Division of Nuclear Materials Safety  
Region I

License No. 38-11957-01  
Docket No. 03006356  
Mail Control No. 602461

cc: Dr. R. Burgess, Radiation Safety Officer  
Mr. G. Begluitti, Safety, Health, and Environmental Manager

In order to continue prompt review of your application, we request that you submit your response to this letter within 30 calendar days from the date of this letter.

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If you have any questions regarding this request for additional information, please contact me at 610-337-5323 or via electronic mail at [Laurie.Kauffman@nrc.gov](mailto:Laurie.Kauffman@nrc.gov).

Thank you for your cooperation.

Sincerely,

Laurie A. Kauffman, Health Physicist  
Decommissioning, ISFSI, and Reactor HP  
Branch  
Division of Nuclear Materials Safety  
Region I


License No. 38-11957-01  
Docket No. 03006356  
Mail Control No. 602461

cc: Dr. R. Burgess, Radiation Safety Officer  
Mr. G. Beglitti, Safety, Health, and Environmental Manager

DOCUMENT NAME: G:\WBL Documents\WBL License RAIL38-11957-01.602461.docx  
[LAT to enter ADAMS Accession No.]

**SUNSI Review Complete: Laurie A. Kauffman**

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