

From: [Lawyer, Dennis](mailto:dave.morgan@stsint.com)
To: dave.morgan@stsint.com
Subject: STS International, Inc., Request for Additional Information Concerning Application for a License Amendment, Control 608763, Lic. No. 47-35296-01, Docket 03038909
Date: Thursday, June 07, 2018 2:47:00 PM

Dear Mr. Morgan,

This is in reference to your letter May 8, 2018, requesting for amendment to Nuclear Regulatory Commission License No. 47-35296-01 Docket No. 03038909. In order to continue our review, we need the following additional information:

1. You have requested to perform non-routine maintenance with licensed material you are currently allowed to provide routine maintenance and training. It appeared that you did follow the main items associated with NUREG-1556, Volume 18, Rev1, "Consolidated Guidance About Materials Licenses Program-Specific Guidance About Service Provider Licenses," Appendix K, but the following items did not seem to be contained in your letter:
 - Ensure emergency procedures will be developed and reviewed for all likely accident scenarios.
 - Commit to providing the customer a service report describing the work that was completed, especially replacement parts and/or sources.
 - Specify where and when surveys will be conducted during non-routine operations.
 - a. Please state that you will ensure emergency procedures will be developed and reviewed for all likely accident scenarios and that you will provide the customer a service report describing the work that was completed, especially replacement parts and/or sources.
 - b. Please specify where and when surveys will be conducted during non-routine operations.
2. NUREG-1556, Volume 18, Rev. 1 Appendix K also requests you to describe the as low as is reasonably achievable (ALARA) aspect of performing non-routine maintenance (e.g., use of shielded containers or shielding). Please describe how ALARA is achieved when changing out the source holder. Include description or diagram of any devices used. Please describe any critical points where the source is directly exposed or could be directly exposed.

We will continue our review upon receipt of this information. Please reply to my attention at the Region 1 Office (Address below) and refer to Mail Control No. 608763. If you have technical questions regarding this letter, please call me at (610) 337-5366.

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. If we do not receive a reply from you within 30 calendar days from the date of this e-mail, we will assume that you do not wish to pursue your application OR amendment request.

Region 1 Office Mailing Address: Licensing Assistance Team, US Nuclear Regulatory Commission Region I, 2100 Renaissance Boulevard, Suite 100, King of Prussia, PA 19406-2713.

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