

**From:** [Ullrich, Elizabeth](#)  
**To:** [Steve Langlois](#)  
**Cc:** [David Durkee](#); [Pfungsten, Jonathan](#)  
**Subject:** RE: Change of Requested NRC License Type  
**Date:** Thursday, June 14, 2018 2:20:00 PM

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LN 06-09241-02, DN 030-39110  
Control No. 608770

Steve,

Just a few additional questions:

1. In accordance with "Response from Applicant" for Section 8.9, "Facilities and Equipment" of NUREG 1556, volume 11 "Revision 1, "Program Specific guidance about Licenses of Broad Scope" (Volume 11), describe the criteria you will use to review and approve facilities and equipment. Criteria should include classification of laboratories, sample diagrams of typical labs of various classifications, and specific descriptions of facilities used for special applications such as iodinations, synthesis, animal facilities, etc. You may wish to review Appendix E, "Facilities and Equipment Considerations" in developing your response. You may limit your response if, as Section 8.A.(1) of your application states, if you commit only to use microcurie quantities. Please be aware, however, that a Type C license of broad scope authorizes you to possess up to curies quantities of several radionuclides and 10s to 100s of millicuries of many others. For example, you could possess up to 1 curie of tritium or carbon-14, 100 millicuries of sulfur-35 or 10 millicuries of phosphorus-32. Therefore, we normally would expect you to address facilities and equipment suitable for the range of activities authorized by a Type C broad license.
2. In Section 8.A.(4) of your application, you referred to Appendix K of Volume 11. Clarify if this is Appendix K, "Radionuclides Classified According to Relative Toxicity" from Revision 0; or if this is Appendix K, "General Topics for Safe Use of Radionuclides and Model Emergency Procedures" from Revision 1.
3. Confirm if you will, or will not, possess sealed sources. If you will possess sealed sources, confirm that you will perform physical inventory of all sealed sources every 6 months.
4. The following items refer to Section H of your application, "Radiological Surveys".
  - This section did not address the criteria for determining the types of surveys to be performed.
  - The frequency of surveys was not clear: It appears that you will require authorized users to perform surveys daily, but it is not clear if this intended to be daily regardless of use, or daily each day of use. It appears that all other areas will be surveyed at least monthly, regardless of use.
  - You provided criteria for leak testing, however, you did not request any sealed sources, and stated earlier that you only expect to need microcurie quantities of tritium.

In accordance with Section 8.10.7, "Surveys and Leak Tests", of Volume 11, submit

procedures to evaluate radiological hazards. Alternately, you may state "We will survey our facility and maintain contamination levels and perform bioassays of occupationally exposed workers in accordance with the survey frequencies and contamination levels published in Appendix L of Volume 11, Revision 2.for conducting radiological surveys. Below is the link to Volume 11, Revision 2:

<https://www.nrc.gov/reading-rm/doc-collections/nuregs/staff/sr1556/v11/>

Please respond with a signed letter. The letter may be sent through regular mail; scanned as a pdf file and emailed to me; or faxed to 610-337-5269. If you have any questions, please call or email. I will be out of the office Friday, June 15 but will be available all next week.

Thanks,  
Betsy

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