

From: Mark Haenchen
To: [Kennedy, Erin](#)
Cc: [Pelke, Patricia](#)
Subject: [External_Sender] Re: Potential Impacts of NRC 2018 Fee Rule Revisions
Date: Thursday, June 28, 2018 4:36:13 PM
Attachments: [Outlook-1511803523.png](#)

Dear Erin,

Thank you for your email and your inquiry.

Regarding Condition 10.A. thru 10.F. our our NRC license, it is true that several locations listed in Conditions 10.B. thru 10.F. are within the geographic boundaries described in Condition 10.A. Specifically, locations specified in Conditions 10.B., 10.E., and 10.F. are located within those boundaries defined within Condition 10A.

Only the two locations defined in Condition 10.C. and Condition 10.D. are not within the boundaries described in Condition 10.A.

Important license updates that we have been planning during recent months, including during our recent inspection when discussed with Kevin Null in April 2018:

1. We plan to submit a license amendment to remove the location that is described in Condition 10F. That location was not used after we amended the Saint Louis University License to include it because Cardinal Glennon Children's Hospital decided to instead get their own NRC license and eventually did.
2. We plan to submit a license amendment to remove the location that is described in Condition 10C., a solitary research laboratory at St. Mary's Health Center, operated by our department of Obstetrics and Gynecology. Radioactive materials have not been used or stored there in quite some time, and the department chair agreed that they no longer plan to use radioactive materials in that location.

Your email is a reminder to submit the license amendment for No. 1. We have had a third party do final status surveys for No. 2, and I expect to have the completed final status survey report by tomorrow, which will facilitate sending that amendment as well. My plan has been to submit separate amendments for each update. I hope to be able to submit those by the end of next week.

Once the amendments are completed and approved by NRC, we will retain the current Conditions 10.A., 10.B., 10.D., and 10.E. Only the location specified in Condition 10.D. will be outside of the geographic boundaries described in Condition 10.A.

Please let me know if you have any questions, or need additional information.

Sincerely,

- Mark Haenchen

Mark Haenchen, M.S., J.D.

*Executive Director, Research Integrity and Safety Group (COIR, EHS, IACUC and IRB Teams)
and Radiation Safety Officer
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From: Kennedy, Erin <Erin.Kennedy@nrc.gov>
Sent: Thursday, June 28, 2018 3:31:31 PM
To: Mark Haenchen
Cc: Pelke, Patricia
Subject: Potential Impacts of NRC 2018 Fee Rule Revisions

License No. 24-00196-07
Docket No. 030-11789

Dear Mr. Haenchen:

On June 22, 2018, the NRC amended Title 10 of the Code of Federal Regulations (10 CFR) Sections 170.31 and 10 CFR 171.16 to add new subcategories for seven fee categories. The NRC staff determined that additional resources are required for licenses with six or more locations of use compared to licenses in the same fee category with fewer than six locations. The NRC revised its fee categories to include new subcategories, to more accurately reflect the cost of services provided by the NRC. Based on these changes to the fee categories, the Region III Materials Licensing Branch needs to confirm the locations of use listed on your NRC Material License No. 24-00196-07, based on the "location of use" guidance below.

A location of use has been defined as the following:

1. An individual building or facility at one address.
2. A contiguous licensee-controlled geographic area, such as a campus or licensee- owned/operated/controlled business campus or park, is considered a single

"location of use" and only one address is listed on the license. Sites that are not contiguous but are located in separate parts of a city, different city or state, are separate "locations of use" and separate addresses are listed on the license.

Although Condition 10. of your license has six separate locations of use listed, an evaluation by the staff has identified that several of those locations may be on one contiguous campus. Please review the locations of use on your materials license and provide clarification as to which locations should be considered one contiguous campus. Please respond at your earliest convenience and no later than July 10th.

If you have any questions concerning this assessment, please contact Erin Kennedy at 630-829-9876.

Thank you,

Erin Kennedy

U.S. Nuclear Regulatory Commission, Region III
Health Physicist- Materials Licensing
Email: erin.kennedy@nrc.gov
Office: 630-829-9876

Song, Taehoon

From: Kennedy, Erin
Sent: Friday, June 29, 2018 8:51 AM
To: Pavon, Sandy; Sandrik, Lauren; Song, Taehoon
Cc: Tomczak, Tammy
Subject: Please add the attached document to ADAMS
Attachments: [External_Sender] Re_ Potential Impacts of NRC 2018 Fee Rule Revisions.pdf

Good morning,

Can you please add the attached email to ADAMS?

License No. 24-00196-07
Docket No. 030-11789

Thanks,

Erin Kennedy

U.S. Nuclear Regulatory Commission, Region III
NSPDP- Materials Licensing
Email: erin.kennedy@nrc.gov
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