

From: Goodman, Jenny
To: [Park, James](#)
Cc: [McCullough, James](#); [Orlando, Paul](#)
Subject: [External_Sender] EA for Water Remediation Technology's (WRT) source material license
Date: Friday, July 27, 2018 8:39:49 AM

Dear Mr. Park

Thank you for providing us with the opportunity to comment on the draft Environmental Assessment for WRT's license renewal application for source material. Staff of the Bureau of Environmental Radiation (BER) has a fundamental difference with the way in which the NRC licenses WRT. In New Jersey, we believe it is the owner of the facility that should be responsible for the licensed material at their site, just as with any other licensee. Therefore, the private and public community water systems are the licensee in NJ. We license WRT as a service provider. Some community water systems hire WRT personnel as their RSO. We also have a requirement that the RSO is available within a reasonable amount of time in case of accidents. Because water chemistry is so varied from place to place in NJ (and even more so in the country), there are issues that occur unique to each facility. Several of our licensees have multiple treatment systems that could capture radionuclides incidentally. For example, there could be an iron removal tank that captures radium, or arsenic treatment that also has an affinity for uranium. Contractors may stop where their contractual agreement ends, but it is the facility which actually owns/possesses/accumulates the radioactive material. Therefore, we license the local water system. Water licensees are not like cardiologist offices. There are not routine nuclides, procedures, or a cookie cutter licensing guidance that can be applied across the board.

Staff believe that the NRC's environmental impacts of the proposed action is adequate. Staff believe there is no justification for the request for a 20 year renewal of their license.

If you have any questions regarding this review, please contact me or James McCullough at james.mccullough@dep.nj.gov or 609-984-5480.

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