



# NIOWAVE, INC.

1012 North Walnut Street  
Lansing, MI 48906  
Phone: (517) 999-3475

November 14, 2018

NRC Region III Office  
2443 Warrenville Road, Suite 210  
Lisle, IL 60532-4352

Attn: Mr. Frank Tran, Ms. Cassandra Frazier, Ms. Patricia Pelke, Dr. Peter Lee

Subj: Mail Control No. 608427, Niowave Additional Information for Submission of Amendment 07 to License No. 21-35144-02

Dear colleagues,

In response to your request for additional information dated November 8, 2018, we provide the following:

1. Oversight of Radiation Protection Program and Authorized Users
  - a. Dr. Valeriia Starovoitova is still available to assist Niowave's program on a consulting basis.
  - b. We acknowledge that since Dr. Starovoitova is no longer a full-time employee at Niowave, she cannot satisfy description of duties as the RSO according to NUREG-1556, Volume 7, Revision 1, Appendix E, "Radiation Safety Duties and Responsibilities" or as an Authorized User according to NUREG-1556, Volume 7, Revision 1, Section 8.7.2, "Authorized Users".
  - c. We confirm that we have stopped using unsealed and dispersible licensed radioactive materials until the NRC has approved another authorized user for unsealed and dispersible licensed radioactive material. Additional authorized users were requested in letter dated September 10, 2018.
  - d. Dr. Terry Grimm, President and Senior Scientist, remains ultimately responsible for Niowave's Radiation Protection Program. Dr. William Peters is Niowave's Acting RSO pending NRC approval as the RSO for Licenses No. 21-35144-02 and 21-35145-01.
2. Dr. Peters is registered for a 40-hour formal course designed for an RSO which includes training in NRC regulatory requirements and standards commensurate with the uses authorized on Niowave's licenses (December 3-7, 2018). We will send his certificate of completion and a document elaborating on his experience with similar types, forms, quantities, and uses of radioactive materials upon completion of the course.

Thank you for your guidance and oversight throughout the amendment process.

Sincerely,

Dr. Terry Grimm  
President and Senior Scientist

**Extremely Urgent**

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