

From: [DeBoer, Briana](mailto:DeBoer.Briana)
To: JOHN.M.BRISBIN@USA.dupont.com
Subject: E.I. du Pont de Nemours and Company, Inc. Request for Additional Information Concerning Application for a License Amendment, Control 608751, License No. 07-13441-02, Docket No. 03020681
Date: Wednesday, January 16, 2019 2:03:00 PM

License No. 07-13441-02
Docket No. 03020681
Control No. 608751

Dear Mr. Brisbin,

This is in reference to your letter dated May 2, 2018, requesting for amendment to Nuclear Regulatory Commission License No. 07-13441-02, Docket No. 03020681. In order to continue our review, we need the following additional information:

1. Page 3 of the report states, "Procedures for Dupont limited annual activity to 10 mCi per year for the 20 year period of use. Under this restriction, the potential total activity was 200 mCi." Please provide the actual annual activity that was used each year at the Field Test Plot area.
2. Please provide copies of the procedures used for the activities at the Field Test Plot at the Stine-Haskell Research Center.
3. Page 6 of the report states, "Using the assumptions above, the relative shift of 6, and using table 5.3 from NUREG 1757, Multi-Agency Radiation Survey and Site Investigation Manual (MARSSIM), 9 sample locations should be used for this Class 1 area. An extra 20% was added to make 11 locations in the area where radioactive materials were used." This table implies the use of the Wilcoxon Rank Sum test which requires the same number of samples be taken in the background, but only four samples were taken in the background. Although C-14 is present in the environment, it does not appear that you are subtracting background from your sample results, therefore you may meet the requirements of the Sign test. Please state if you are using the Wilcoxon Rank Sum test or the Sign test.
4. Page 6 of the report states, "The surveyor's discretion was used for sample number and the method of choosing locations in the Class 3 area." Later on the same page it states, "5 soil sample locations of the non-impacted area; coordinates randomly chosen using the Microsoft excel Rand() function." NUREG 1757, Multi-Agency Radiation Survey and Site Investigation Manual (MARSSIM) states to take random samples in a class 3 area. Further, the first sentence refers to the area as a class 3 and the second sentence refers to the area as non-impacted. Please state if this area is a class 3 or non-impacted area and if the samples taken were chosen at the surveyors discretion or randomly.

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. 608751. If you have technical questions regarding this letter, please call me at (610) 337-5370.

Your reply must be an originally signed and dated letter. The letter may be scanned and submitted as a pdf documents 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 amendment request.

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

Thank you,
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