



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION III
2443 WARRENVILLE ROAD, SUITE 210
LISLE, ILLINOIS 60532-4352

APR 16 2019

Liesje Myers, CNMT
Radiation Safety Officer
Boone Hospital Center
1600 East Broadway
Columbia, MO 65201

Dear Ms. Myers:

Enclosed is Amendment No. 90 to your NRC Material License No. 24-01565-01 in accordance with your request.

Please review the enclosed document carefully and be sure that you understand all conditions. If there are any errors or questions, please notify the U.S. Nuclear Regulatory Commission, Region III office at (630) 829-9887 so that we can provide appropriate corrections and answers.

If you have any questions concerning this amendment please contact me at either (630) 829-9841 or (800) 522-3025, ext. 9841. My fax number is 630-515-1078. My email address is colleen.casey@nrc.gov.

Upon receipt of this letter, please contact me via email to arrange a date and time for a telephone call to discuss this letter and the information we are seeking.

Please do not submit a response to us unless we have a telephone call first to discuss these matters, which will help to ensure that the information you provide fully resolves our remaining questions and concerns.

- A. This also refers to your letter ("the letter") dated January 7, 2019, in which you requested that materials permitted by 10 CFR 35.400 be deleted from your license as follows: strontium-90, iodine-125, palladium-103 and cesium-131.

We were unable to approve the deletion of these materials because the information in your letter was insufficient to complete our review.

If you wish to pursue this matter, please provide only one complete, written response that is addressed to my attention at the above address, as "additional information to control number 611141."

The enclosed document contains sensitive security-related information.
When separated from this cover letter this letter is uncontrolled.

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Please be sure to accompany/transmit your response with a brief business style letter that identifies your license by name, mailing address and license number; control number as given above; is currently dated; is physically and legibly signed by a senior management representative; is addressed to my attention; and completely resolves the information requested below to continue our review. This will help ensure that your response is processed correctly in our offices. We will then continue our review.

Under no circumstances should you submit more than one, complete, written response, even by different means of transmission, such as email, regular mail, etc. To do so will introduce confusion and delay in the processing and review of your response.

1. Your letter states that you "currently have no strontium-90, iodine-125, palladium-103 and cesium-131 in your possession" but that is insufficient to justify the removal of these sources from your license.

For historical context, please state when the approximate last date of use was for each of these sealed sources, strontium-90, iodine-125, palladium-103 and cesium-131.

If you never received or possessed any or all of these materials, please so state specifically. Please note that we will corroborate your response with a review of your inspection history.

2. Your letter did not indicate whether it was also your intention to remove areas of use and/or locations of use from the license, where the strontium-90, iodine-125, palladium-103 and cesium-131 sealed sources were ever received, possessed, used or stored, for unrestricted use.

In your response, please clearly state whether you wish to have areas of use and/or locations of use removed from the license where these materials were ever received, possessed, used or stored, for unrestricted use.

Please state specifically which areas of use and/or locations of use you wish to have removed from the license for unrestricted use.

Please submit complete diagrams of each affected facility (area(s) of use and/or locations/addresses of use) with exposure rate survey and wipe test results keyed to specific locations, as appropriate. In the alternative, it may be possible for you to submit the final leak tests for these sealed sources prior to their final transfer for disposal.

Please submit complete diagrams of each affected facility (area(s) of use and/or locations/addresses of use) with exposure rate survey and wipe test results keyed to specific locations, as appropriate.

Do not submit blueprints or copies of blueprints. The diagrams you used to add the affected areas of use to the license; the diagrams you used for routine exposure rate surveys and wipe tests; and/or diagrams prepared in accordance with NUREG 1556

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Vol. 9, Rev. 2, Figure 9.1 (add the direction of north) are examples of diagrams that will facilitate our understanding of the areas you wish to release for unrestricted use.

Submitting diagrams of only certain components/fragments of the areas you are requesting to be released for unrestricted use, such as certain walls, hoods, sinks, floors, etc., without the full context of each entire affected area, is unacceptable and leads to confusion.

3. Please note that we cannot authorize licensees to release the "locations/addresses of use" or "areas of use" from licenses for unrestricted use (even by other staff members) until we have received and reviewed a copy of the results of final status surveys, i.e., "decommissioning" and "close-out surveys," for the affected facilities.

The final status surveys must include a complete historical review of all actual licensed materials possessed, used, stored, etc., including sealed sources and unsealed materials, spills, and contamination.

For the removal of the strontium-90, iodine-125, palladium-103 and cesium-131 sealed sources from your license, if sources were transferred or disposed of please provide a copy of the final leak test result for the sealed source; a copy of an acknowledgment of receipt from the licensed entity who took possession of the source, with an appropriate level of detail to identify the source and recipient; the NRC license number or license copy of the recipient/transferee; and if the recipient/transferee is an Agreement State licensee, please include a current and complete, un-redacted copy of its license that clearly shows it is licensed to receive your sources.

The final leak test results and inventory results must contain the information required by 10 CFR 35.2067(a) and (b), respectively.

If your sealed sources were transferred to another appropriately licensed entity or transferred for disposal, and if the source transfer took place within 6 months of the source's receipt under your license, it may be possible to use the leak test provided by the vendor that accompanied the source initially.

If the transfer took place 6 months or more after the sources were initially received by you, then a leak test must have been performed prior to transfer or disposal.

Please note that common documents we often see submitted for the purpose of demonstrating that sealed sources have been transferred or disposed of to appropriately licensed entities, such as bills of lading, shipment manifests and shipping papers, do not usually contain sufficient information to demonstrate that materials have been safely received. They typically indicate that materials were prepared for shipment or transfer only, not that they were received and accepted into the recipient's inventory under its license.

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In addition, bills of lading, shipment manifests and shipping papers typically are prepared with a printing font too small to read. It may be necessary to adjust the copying function for such documents to permit readability, such that a font of approximately 11 results.

- B. Your letter also requested that your authorization for cesium-137 listed in Subitem Nos. 6. through 9.G. be changed to "storage only incident to disposal."

In this amendment, we were only able to approve your request to change the authorization for cesium-137 listed in Subitem Nos. 6. through 9.G. to "storage only incident to disposal."

However, please be cautioned that this authorization is not expected to be in effect for an indefinite period of time.

It is expected that you are actively arranging the final transfer and disposal of this material, as well as the other cesium-137 materials listed on your license for "storage only incident to disposal."

This is because 10 CFR 35.92 restricts the disposal of licensed material for "decay -in-storage" (DIS) to only those materials with a half- life of 120 days or less, provided that those materials meet the other requirements in 10 CFR 35.92.

Cesium-137 has a half- life of 30.17 years, which excludes it from DIS.

In your written response, please also describe the measures you are taking to dispose of all the cesium-137 materials on your license that are currently authorized only for "storage incident to disposal."

Please also include a reasonable, approximate near term timeframe when you expect to have these materials disposed of to an appropriately licensed entity. It appears that some of these materials have already been in "storage incident to disposal" for more than 2 years.

Please note that the information in A. above will also apply to your disposal of all of the cesium-137 sealed sources currently listed on your license "for storage only incident to disposal."

The following references may assist you: 10 CFR 30.41; 10 CFR 30.51; 10 CFR 35.92; 10 CFR 35.2092; NUREG 1556 Vol. 9, Rev. 2, section 11, "Termination of Activities and NUREG 1757, Vol. 1, Rev. 2 at <http://www.nrc.gov/reading-rm/doc-collections/nuregs/staff/sr1757/v1/>.

Please also be reminded that 10 CFR 30.9(a) requires: "(a) Information provided to the Commission by an applicant for a license or by a licensee or information required by statute or by the Commission's regulations, orders, or license conditions to be maintained by the applicant or the licensee shall be complete and accurate in all material respects."

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NRC's Regulatory Issue Summary (RIS) 2005-31 provides criteria to identify security-related sensitive information and guidance for handling and marking of such documents. This ensures that potentially sensitive information is not made publicly available through ADAMS, the NRC's electronic document system.

Pursuant to NRC's RIS 2005-31 and in accordance with 10 CFR 2.390, the enclosed license document is exempt from public disclosure because its disclosure to unauthorized individuals could present a security vulnerability.

The RIS may be located on the NRC Web site at: <http://www.nrc.gov/reading-rm/doc-collections/gen-comm/reg-issues/2005/ri200531.pdf> and the link for frequently asked questions regarding protection of security related sensitive information may be located at: <http://www.nrc.gov/reading-rm/sensitive-info/fag.html>.

A copy of this letter will be available electronically for public inspection in the NRC Public Document Room or from the Publicly Available Records (PARS) component of NRC's document system (ADAMS). The NRC's document system is accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html> (the Public Electronic Reading Room).

You will be periodically inspected by NRC. Failure to conduct your program in accordance with NRC regulations, license conditions, and representations made in your license application and supplemental correspondence with NRC will result in enforcement action against you.

This could include issuance of a notice of violation, or imposition of a civil penalty, or an order suspending, modifying or revoking your license as specified in the General Statement of Policy and Procedure for NRC Enforcement Actions.

Since serious consequences to employees and the public can result from failure to comply with NRC requirements, prompt and vigorous enforcement action will be taken when dealing with licensees who do not achieve the necessary meticulous attention to detail and the high standard of compliance which NRC expects of its licensees.

The NRC's Safety Culture Policy Statement became effective in June 2011. While a policy statement and not a regulation, it sets forth the agency's *expectations* for individuals and organizations to establish and maintain a positive safety culture.

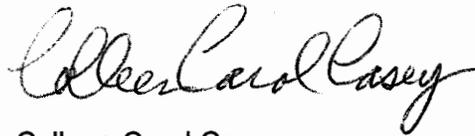
You can access the policy statement and supporting material that may benefit your organization on NRC's safety culture Web site at <http://www.nrc.gov/about-nrc/regulatory/enforcement/safety-culture.html>.

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We strongly encourage you to review this material and adapt it to your particular needs in order to develop and maintain a positive safety culture as you engage in NRC-regulated activities.

Sincerely,

A handwritten signature in cursive script that reads "Colleen Carol Casey".

Colleen Carol Casey
Materials Licensing Branch

License No. 24-01565-01
Docket No. 030-02304

Enclosure:

Amendment No. 90