



UNIVERSITY OF MINNESOTA
TWIN CITIES

Boynton Health Service
410 Church Street S.E.
Minneapolis, Minnesota 55455

March 9, 1981

Mr. Richard E. Cunningham
Director
Division of Fuel Cycle and Material Safety
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Mr. Cunningham:

Your letter of February 11, 1981, concerning submission of information relative to radiological contingency planning, which was addressed to Mr. Clinton T. Johnson, Associate Vice President, has been referred to me for response. The orders pertaining to the contingency plan submission referred to two NRC licenses issued to the University of Minnesota; License #22-00187-46, which is the University broad license for campus use of radioactive materials, and License #22-00187-49, which is the University license for radioactive waste materials resulting from uses of authorized materials under the NRC licenses issued to the University (primarily from materials used under the Health Sciences Broad License #22-00218-29 and the Campus Broad License #22-00187-46).

On February 27, 1981, Mr. Ralph Wollan, University Radiation Protection Officer, and I called Mr. R. G. Page at your Washington Office to request clarification of conditions under which a contingency plan would or would not be necessary. The following information concerning use of radioactive materials under the licenses in question was outlined in our discussion with Mr. Page. 1) Radioactive materials under the Campus license (22-00187-46) are used in several widely separate geographic locations (i.e. Minneapolis Campus, St. Paul Campus, Duluth Campus, Hormel Institute, Waseca Campus, Morris Campus and several other University locations). In addition, radioisotope usage at these campuses, is distributed throughout several separate buildings. 2) Radioactive waste materials collected and held in on-site storage facilities under license #22-00187-49, are low specific activity wastes which are held in temporary storage buildings located on the Minneapolis Campus, Duluth Campus, Hormel Institute and Rosemount Research Center. The total activity, excluding sealed sources, stored at any one time is considerably less than the activity received under the broad licenses. This is primarily due to the decay of short half-life radioisotopes prior to transfer to radioactive waste receptacles and during storage.

Based on this information, it was agreed that it would not be required for the University of Minnesota to submit a contingency plan if the licenses are amended to restrict the total activity in any one building to within the conditions of your Enclosure 2, "Licensed Possession Limits for Which Licensee Radiological Contingency Plans are Required".

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Therefore, I request the following amendment be added to the conditions of NRC Licenses #22-00187-46 and #22-00187-49:

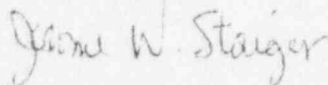
The activity of Group I, II and III radioisotopes of unsealed form present in any one building will be maintained at $< 1/10$ of the limiting possession limit designated for these radioisotopes in the document entitled, "Licensed Possession Limits for Which Licensee Radiological Contingency Plans are Required".

We presently have the capability within the University Radiation Protection Program to determine the total possession of various radioisotopes for each user on each campus and can therefore assure that at no time would the quantity of a radioisotope in a particular building exceed $1/10$ of the designated limit.

Because our Campus Broad License is in the process of review for renewal by the Region III NRC Office, Mr. Page suggested that a copy of the amendment request be forwarded to Mr. John Cooper, Region III NRC.

I wish to thank Mr. Page for the helpful suggestions and assistance he provided in answering our questions.

Sincerely,



Jerome W. Staiger
Senior Health Physicist

Department of Environmental
Health and Safety

JWS:bc

cc: Mr. John Cooper
Clinton T. Johnson