



CONVERSATION RECORD

NAME OF PERSON(S)/TITLE CONTACTED OR IN CONTACT WITH YOU Dominico Luongo, Laboratory Compliance Manager and RSO		DATE OF CONTACT 08/06/2019	TYPE OF CONVERSATION	
E-MAIL ADDRESS luongo@oakland.edu		TELEPHONE NUMBER (248) 370-4314	<input type="checkbox"/> E-MAIL	<input type="checkbox"/> INCOMING
			<input checked="" type="checkbox"/> TELEPHONE	<input checked="" type="checkbox"/> OUTGOING
ORGANIZATION Oakland University		DOCKET NUMBER(S) 030-00823		
LICENSE NAME AND NUMBER(S) 21-10725-03		MAIL CONTROL NUMBER(S) 612375		

SUBJECT
Additional Information Request concerning the licensee's request to amend the referenced U.S. NRC radioactive materials license, including to remove radionuclides (Ca-45, Rb-86, Cr-51, Cu-67); to decrease RSC mtg. frequency from quarterly to semiannual; and to change who does internal program audits

SUMMARY AND ACTION REQUIRED (IF ANY)

This record concerns the licensee's May 31, 2019 letter (NRC Accession No. ML19155A2186) requesting (1) to remove calcium-45, rubidium-86, chromium-51, and copper-67 authorizations from Item No. 6 of the referenced radioactive materials license; (2) to reduce the frequency at which the licensee's radiation safety committee (RSC) meets; and (3) to change the individuals completing the licensee's internal audits.

Upon review, we have noted that this request is lacking some details needed to complete the review. First, regarding the request to remove radionuclides, it lacks a description of the licensee's radioactive materials use history for radionuclides requested to be removed. Second, also regarding the request to remove radionuclides, it lacks final disposition information and closeout surveys for areas where those radionuclides were used, under the license. Finally, regarding the request to reduce the frequency at which the RSC meets, additional information is needed concerning how issues will be handled if they during the longer intervals between meetings. As discussed, please see attached for information needed to complete our review of your request.

Please submit additional information as described. Include a signed and dated cover letter transmitting your response. Submission of your response via facsimile to 630-515-1078 or as a pdf file attached to an email will allow for the quickest processing. Please call or email me with any questions you may have, or if you are unable to respond within 14 days (on or before August 20, 2019).

NAME OF PERSON DOCUMENTING CONVERSATION
 Sara A. Forster, M.S., Health Physicist, Materials Licensing Branch, DNMS, RIII office, sara.forster@nrc.gov

SIGNATURE <i>Sara A. Forster</i>	DATE OF SIGNATURE 08/06/2019
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CONVERSATION RECORD (continued)

LICENSE NAME AND NUMBER(S)

MAIL CONTROL NUMBER(S)

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SUMMARY AND ACTION REQUIRED (IF ANY) (Continued)

1. Radioactive Materials Use History for calcium-45, rubidium-86, chromium-51, and copper-67:

As discussed, in accordance with Section 7.4, "Group 2: Unrestricted Release Using Screening Criteria; No Decommissioning Plan Required," to NUREG 1757, Vol. 1, rev. 2, "Consolidated Decommissioning Process - Decommissioning Process for Materials Licensees," please provide the following information - Descriptions of each area where each of these four radionuclides were received, used, stored (including for decay-in-storage, as applicable), and disposed of (or transferred, as applicable) - regarding the historical use of calcium-45, rubidium-86, chromium-51, and copper-67 at the licensee's facilities located at 2200 N Squirrel Rd., Rochester, Michigan:

- A. List Room number(s) and provide a facility diagram - drawn to the scale of an 8 1/2 " x 11" sheet of paper - showing refrigerators, storage cabinets, work benches, hoods, sinks used for sewerage disposals, and waste, as applicable.
- B. Provide the maximum radioactive quantity (millicuries or microcuries) received per vial and/or stored at the licensee's facility
- C. Provide the maximum radioactive quantity stored at the licensee's facilities and the maximum quantity used per experiment or other manipulation.
- D. Provide the most recent dates on which the radionuclide was received, used, stored, and dispositioned (disposed of via sewerage, decay-in-storage, or dry active waste, etc.; transferred to another licensee or authorized recipient).

2. Radioactive Materials Use History for calcium-45, rubidium-86, chromium-51, and copper-67:

As discussed, provide the most recent area surveys or Final Closeout surveys, as well as final disposition information, for areas where each of these four radionuclides were received, used or stored, showing no residual material or contamination in those areas;

- A. Include radiation area surveys and wipe tests as part of your request. Identify locations where surveys were taken on the submitted facility diagram
- B. Confirm that either the radionuclide was never used at the licensee's facilities or that all residual material has been disposed of (including any shipments or final surveys and disposals of decay-in-storage wastes).
- C. For all waste disposed of via transfer to authorized recipient, please provide (i) a confirmation (such as a signed and dated letter) from the recipient of receipt and (ii) a copy of the recipient's radioactive materials license, authorizing receipt of the licensed material.

3. Plans for addressing issues arising with a reduced Radiation Safety Committee (RSC) reduced meeting frequency

As discussed, please provide additional details as to measures the licensee will take to assure that a semi-annual meeting frequency will be adequate for the program.

- A. Confirm that the RSC will meet at least twice per year.

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CONVERSATION RECORD (continued)

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SUMMARY AND ACTION REQUIRED (IF ANY) (Continued)

3. Plans for addressing issues arising with a reduced RSC reduced meeting frequency (continued):

B. Confirm either that:

1. If issues arise - such as spills, releases, new radioactive materials uses or users, or other items of radiological concern, as identified by the Radiation Safety Officer (RSO), an Authorized User (AU), or other member of the licensee's program, the RSC will convene on an as-needed, ad-hoc basis, to discuss those issues in a timely way;

OR

2. To assure that issues are addressed as they arise or in a timely way, another method (please describe) will be utilized to assure those issues of radiological concern.