NRC FORM 699 (03-2013)

U.S. NUCLEAR REGULATORY COMMISSION

CONVERSATION RECORD

DATE OF SIGNATURE: 09/25/2019

NAME OF PERSON(S) CONTACTED OR IN CONTACT WITH YOU	DATE OF CONTACT	TYPE OF CONVERSATION
See below.	08/28/2019	☐ E-MAIL ☐ TELEPHONE ☐ INCOMING ☑ OUTGOING
E-MAIL ADDRESS	TELEPHONE NUMBER	
	(888) 390-0922	

ORGANIZATION	DOCKET NUMBER(S)
Croft Associates	71-9338
LICENSE NUMBER(S)	CONTROL NUMBER(S)

SUBJECT

Content Specification Teleconference

SUMMARY

NRC participants: Chris Allen and Veronica Wilson
Croft participants: Alex Ferguson
Los Alamos National Laboratory: Kevin John
Brookhaven National Laboratory: Cathy Cutler
Oak Ridge National Laboratory: Kevin Felker

The phone call between NRC staff and Croft Associates Limited to discuss the content specification in amending the Model No. 3977A Certificate of Compliance began at approximately 10 A.M. eastern standard time. Croft provided in the original application a table of nuclides generated by the proton irradiation of a Thorium-232 disc but did not identify the nuclides as proprietary information. However, in their response to a request for additional information, Croft provided a more extensive list of nuclides and requested the list of nuclides be withheld as proprietary information. NRC staff explained that, because Croft had chosen to specify the contents by the nuclides generated by irradiating the thorium disc, this would create problems in modifying the certificate of compliance and suggested that the contents be specified using parameters associated with the proton irradiation of the thorium disc (e. g., cooling time). It was explained to NRC staff that this might require additional amendments if the irradiation parameters were

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ACTION REQUIRED (IF ANY)

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NAME OF PERSON DOCUMENTING CONVERSATION

Chris Allen

SIGNATURE

William C. Allen

CONVERSATION RECORD (continued)

SUMMARY: (Continued from page 1)

were changed. There was some discussion of modifying the shielding analysis approach. However, because the current analysis had very little margin to the regulatory dose rates, changing the shielding analysis was not considered viable. NRC staff then suggested specifying the content using the source term (i.e., using the number of particles emitted from the irradiated thorium disc as well as the energy associated with the particles emitted) since this method had previously been used to approve packages. This was acceptable to Croft. The call concluded at approximately 11:00 A.M. eastern standard time.

CONVERSATION RECORD (continued)

ACTION REQUIRED (Continued from page 1)