



UNITED STATES
ATOMIC ENERGY COMMISSION

WASHINGTON, D.C. 20545

NOTE TO: R. Purple
D. Ziemann
G. Lear

COMMENTS ON MEMO DATED OCTOBER 30, 1974 RE GENERALIZATION OF LICENSE
CONDITIONS RELATED TO SPECIAL NUCLEAR, BYPRODUCT AND SOURCE MATERIALS

The purpose of the October memo was to avoid unnecessary license amendments involving the Part 30, 40 and/or 70 authorization contained in the Part 50 license. A draft letter that explained our intent to the licensees was enclosed for your use. Since the October memo was distributed the regulatory guide (referenced in the draft letter) was revised and broadened in scope. In addition several proposed amendments to the regulations which differed slightly from our draft letter were published. This memo will clarify the present licensing objective.

Whenever a licensee requires a change to his license to accommodate special nuclear material, byproduct, and/or source material changes, it would be appropriate to request a license amendment that makes the license condition more general. To support such a change the licensee should submit the applicable information identified in Regulatory Guide 1.70.3 dated February 1974. The revised guide dated November 1974 is too broad for our present use and does not as clearly identify the needed information. We need sufficient information for the Radiological Assessment Branch to determine that the licensee's program for radioactive materials safety is acceptable. Once this determination has been made we could issue a generalized license amendment that permits the licensee to have and change materials within stated limits without AEC approval.

The suggested form of the license amendment and associated technical specification changes were an enclosure to the draft letter. The wording for the changes were taken from RPOP-515, Revision 1. The proposed changes to the regulations has a record retention requirement of 2 years versus the 5 years of the RPOP.

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The above should be considered in evaluating replies received from licensees. For licensees that have not yet been sent a letter, the attached letter with enclosures should be sent.

T. J. Carter, Technical Coordinator
for Operating Reactors
Directorate of Licensing

Enclosure:
Sample Letter

This memo was done by the above
 because I asked questions about
 what to do since Reg. 6.1 since
 1.70.3 has been revised and
 since the records retention period
 in the suggested Tech Spec. w/
 RFP-515 says 5 yrs. and Regulation
 say 2 years. Jerry gave me this
 since he was told not to formally
 send it out - just to tell me
 to use the Feb. 74 version of
 RG 1.70.3 and change years to 2
 in suggested Tech Spec.

John Rizza
 1/14/75

On letters to licensees
 10-30-74

The standard licensing format has been
modified to include activity "associated with
radioactively contaminated apparatus". This phrase
should be added to conditions B(4) and B(5)

from Carter
w/updated means.