U.S.NRC
UNITED STATES NUCLEAR REGULATORY COMMISSION
Protecting People and the Environment

Region I Office
Division of Nuclear Materials Safety
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Telephone Conversation Record

Date: April 8, 2020
License No. 01-06571-10
Docket No.*(no hyphens)*: 03003575
Mail Control/Report No. N/A
Licensee Name: National Aeronautics and Space Administration (NASA),
George C. Marshall Space Flight Center
Participant(s) Name/Title: Philip O. Brown, Radiation Safety Officer (RSO)
Work Telephone No. 256-544-5738
Business Cellphone No. 256-436-1106
NRC Representative Name/Title: Randolph C. Ragland, Jr., Senior HP

Subject: NASA's April 7, 2020, Request for Regulatory Relief RE: COVID-19

Discussion: On April 7, 2020, NASA's RSO, Mr. Philip Brown, contacted Mr. James Trapp, Director, Division of Nuclear Materials Safety, NRC Region I, by email, to notify NRC that due to the COVID-19 shutdown, NASA was unable to perform quarterly uranium bioassays and quarterly dosimeter swap outs which are conditions of NRC license, 01-06571-10, and Mr. Brown requested regulatory relief.

A review of licensing documents showed that NASA's license commitments with respect to uranium bioassays, does not specify a bioassay frequency. Because it does not specify a frequency, it would not be a regulatory violation if NASA changed the frequency of quarterly bioassays during the COVID-19 shutdown.

In NASA's January 27, 2016, license application, which is a condition of NASA's NRC license, it says:

> Personal radiation monitoring devices, TLDs, are provided and read by a certified vendor. Dosimetry is changed out quarterly. Radiation monitoring reports are received quarterly and are maintained by the MSFC RSO.

This commitment requires dosimetry to be changed out and reviewed on a quarterly basis and NASA would need relief from this commitment.

However, the license application also includes the following:

NUREG – 1556, Vol 7, "Program Specific Guidance About Academic, Research and Development, and Other Laboratory Licenses of Limited Scope", dated December 1999.

We have done a prospective evaluation and determined that unmonitored individuals are not likely to receive, in one year, a radiation dose in excess of 10% of the allowable limits in 10 CFR Part 20 or we will monitor individuals in accordance with the criteria in the section entitled "Radiation Safety Program – Occupational Dose in NUREG – 1556, Vol 7, "Consolidated Guidance about Materials Licenses: Program Specific Guidance About Academic, Research and Development, and Other Laboratory Licenses of Limited Scope", dated December 1999.

To meet this license commitment, Mr. Brown indicated that he would be able to document a prospective evaluation that demonstrated that badged (i.e., dosimetry) employees never exceed 10% of the occupational dose limits; therefore, NASA could suspend use of dosimetry during the current period in accordance with license commitments.

Based on this discussion, Mr. Brown and Mr. Ragland agreed that a formal license exemption or license amendment is not necessary to meet license committments, and that Mr. Brown could satisfy regulatory commitments with a note-to-file.

Action Required: Mr. Brown will draft a note to file.

SUNSI REVIEW

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SUNSI Review Completed by: R. Ragland April 8, 2020