

**From:** [Hamilton, Daniel Stephen \(Dan\) CIV USARMY CCDC ARL \(USA\)](#)  
**To:** [Ullrich, Elizabeth](#); [Borisky, Michael J CIV USARMY FUTURES COMMAND \(USA\)](#)  
**Cc:** [Morrone, Christopher J CIV USARMY CCDC ARL \(USA\)](#)  
**Subject:** [External\_Sender] RE: your request for an exemption (License No. 19-12056-02) (UNCLASSIFIED)  
**Date:** Wednesday, April 22, 2020 5:24:03 PM

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**CLASSIFICATION: UNCLASSIFIED**

Ms. Ullrich,

In response to your email dated 21 April 2020, the CCDC-Army Research Laboratory (CCDC-ARL) is providing the following additional information per Part 30, Code of Federal Regulations. We acknowledge our NRC license of broadscope is not bound by Part 39.

License No. 19-12056-02

1. We confirm CCDC-ARL's request for relief from the leak test frequency required by License Condition 15.
2. We confirm CCDC-ARL's request for relief from the physical inventory at 6 month intervals as listed in License Condition 17 and identified in License Condition 20 (the requirement to implement the commitment in our letter to the NRC dated October 1, 2014, stating in Section 10.3 that we will perform a semi-annual inventory).
3. We confirm CCDC-ARL's request for relief from the survey frequency described in the letter dated October 1, 2014, to be in accordance with NUREG-1556, Volume 11, and the monthly surveys required by the letter dated December 9, 2016 (these survey commitments are required by License Condition 20, in the letters listed).

If you have any questions or require additional information, we can be contacted by email.

Sincerely,

Dan Hamilton

ARL Radiation Safety Officer/LSO/RFSO  
APG CCDC-Army Research Laboratory

Mike Borisky

ARL Radiation Safety Officer/LSO/RFSO  
Adelphi Laboratory Center, Adelphi MD

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**From:** Ullrich, Elizabeth <Elizabeth.Ullrich@nrc.gov>

**Sent:** Tuesday, April 21, 2020 1:54 PM

**To:** Hamilton, Daniel Stephen (Dan) CIV USARMY CCDC ARL (USA) <daniel.s.hamilton.civ@mail.mil>; Borisky, Michael J CIV USARMY FUTURES COMMAND (USA) <michael.j.borisky.civ@mail.mil>

**Subject:** [Non-DoD Source] your request for an exemption

License Nos. 19-12056-02, Mail Control No. 618657

SMB-141, Mail Control No. 618670  
Department of the Army/CCDC-ARL

Dan and Mike,

In order to complete the exemption requests, we need additional information. Also, I will need you do address your request for the broad scope license under Part 30 separately from the request(s) for the Part 40 license. In addition, please note that you are not bound by Part 39, which is applicable to persons licensed to perform well-logging, therefore the leak testing requirement there is not applicable to your license.

License No. 19-12056-02

1. Confirm if you are requesting relief from the leak test frequency required by License Condition 15.
2. Confirm if you are requesting relief from the physical inventory at 6 month intervals as listed in License Condition 15. Please note that a review of your license requirements did not identify any commitment for quarterly inventory. You are also required by License Condition 20 to implement the commitment sin the letters listed. The letter dated October 1, 2014 stated in Section 10.3 that you would perform a semi-annual inventory. If you believe there is a commitment to perform quarterly inventory, you should identify the document that contains that commitment and request exemption from that.
3. Confirm if you are requesting relief from the survey frequency described in the letter dated October 1, 2014, to be in accordance with NUREG-1556, Volume 11, and the monthly surveys required by the letter dated December 9, 2016. If there are other commitments for surveys for which exemption is needed, please identify the commitment and the document in which it is contained. These survey commitments are required by License Condition 20, in the letters listed.

License No. SMB-141

1. Confirm if you are requesting relief from License Condition No. 15, which requires inventory be performed every 6 months, and License Condition xx which includes the letter dated September 18, 205 which commits to performing inventory every 6 months. If you believe there is a commitment to perform inventory quarterly and need relief from that commitment, you should identify the document that contains that commitment and request exemption from that.
2. Confirm if you are requesting relief from License Condition 16, which lists the letter dated September 18, 2015. This letter requires, in part, that surveys be performed at the frequency described in NUREG-1556, Volume 11, and that leak tests be performed in accordance with NUREG-1556, Volume 11.

You may respond to this directly be email, and that email should come directly to me. If you have any questions, contact me by email. If we need to discuss, we can set up a time to call.

Thanks,  
Betsy

Betsy Ullrich, Senior Health Physicist  
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