

34-13219

JUN 27 1979

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(98306)

Radiation Management Corporation
Science Center Building 2
ATTN: Mr. Stephen M. Kim
3508 Market Street
Philadelphia, PA 19104

Gentlemen:

This refers to your application dated January 23, 1979 for renewal of Radiation Management Corporation (RMC) License No. 37-13129-01. Additional information is needed in support of your application.

Our review of your application reveals additional information is needed in support of your application. Enclosed for your guidance is a copy of Guide 10.7, GUIDE FOR THE PREPARATION OF APPLICATIONS FOR LICENSES FOR LABORATORY USE OF SMALL QUANTITIES OF BYPRODUCT MATERIAL. You should note that Guide 10.7 describes the minimum information needed for review of applications for use of limited quantities of byproduct material. Although, you may of course exceed our established guidelines, we require, as a minimum, that you meet the guidelines as described in Guide 10.7. In the following we have described certain additional information which was not provided or was not clear in your application for which we need additional information. Where applicable, we have referenced pertinent sections in Guide 10.7, and as will be shown in the following, we have provided two (2) other guides which are applicable to your program. Please provide additional information concerning the following:

- ✓ 1. Licensed material to be possessed in RMC facilities. Although, Attachment 3 to your application specifies an extensive list of licensed material to be possessed under your license, it is not clear to us the specific licensed materials and total quantities to be possessed in each RMC location at 3508 Market Street, Philadelphia, Pennsylvania, your Chicago office, and at the Pottstown Ecological Laboratory. Please specify the kinds and quantities of licensed material to be possessed at each specific location. Also, please provide more specific locations for your Chicago and Pottstown locations. (Street names and numbers or other specific location information.) Refer to Items 1(b), 6(a) and 6(b) in Guide 10.7.

We have noted that Attachment 3 of your application requests authorization to possess up to 10 microcuries of protactinium-231. This is not byproduct material and may be possessed and used without a license issued by the Nuclear Regulatory Commission.

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2. Licensed material to be possessed at temporary job-sites RMC. Item 5 and Attachment 16 and 17 of your application appear to indicate that you use licensed material at three (3) locations only. Attachment 3, Items 8.E.1, 2., 7., and 17. specify that you possess certain licensed material at customers sites (temporary job-sites). Please describe the licensed material you will possess at temporary job-sites. If you perform instrument calibrations at temporary job-sites, we need a description of the licensed material to be used including the kinds and quantities. If you possess licensed material incident to the performance of other activities such as leak tests of sealed sources and sample analysis, you should describe in general terms the kinds and quantities of licensed materials to be possessed. For example, for test samples, leak test wipes, etc., you may want to specify any byproduct material, in any form, not to exceed 10 millicuries total.
3. Activities to be performed under your license. Attachment 3, Item 8.E. of your application specifies that you possess and store licensed material in performing instrument calibrations, sample analysis, leak tests of sealed sources, and perform certain research studies involving californium-252 sources. We are not certain that we have a clear understanding of each activity to be performed on your license. Although Attachment 12, Item 11 of your application, for example, describes your procedures for leak testing of sealed sources, we are unable to determine if you meet our guidelines concerning leak testing of sealed sources. (Refer to Item 14.d. in Guide 10.7.) We need a description of each activity you will perform in RMC facilities and at temporary job-sites. For services to be performed for your customers, leak test, radiation surveys, decontamination, etc., you should provide a description of each activity and a description of the procedures RMC employees will follow during the performance of each activity. Since each activity you are authorized to perform will be specified in your license, it is important that we understand each activity you will perform that you will employ good procedures. Refer to Item 7 in Guide 10.7 for general guidance. Please note that the information requested in Items 1, 2 and 3 herein may be combined in your reply.
4. Performance of activities at customers' locations. Your application specifies certain activities to be performed at customers' sites. We need to know the following:
- Procedures to be followed by RMC employees to assure that any licensed material brought in to customers' facilities by RMC employees is secured against any unauthorized use or removal.
 - Procedures to be followed by RMC employees to assure that the radiation levels and radiation exposures to personnel do not exceed the limits of 10 CFR Part 20.

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- c. Procedures to be followed by RMC in obtaining written approval from each customer to possess licensed material and/or to perform certain activities involving licensed material to the customer's facilities. (contracts, letters, etc.)
5. Radiation Surveys. Attachment 12 of your application describes your radiation protection procedures and Section 6 of this attachment describes your radiation survey program. Your application does not describe your radiation survey program in sufficient detail to enable us to have a clear understanding of the kinds and frequencies of radiation surveys you will perform in RMC facilities. Also, we have noted that your application does not describe your radiation protection procedures and your radiation survey program during the performance of activities at temporary job-sites. Refer to Item 14 in the enclosed Guide 10.7 and also to the enclosed copy of Guide 8.21, HEALTH PHYSICS SURVEYS FOR BYPRODUCT MATERIAL AT NRC-LICENSED PROCESSING AND MANUFACTURING PLANTS. Although Guide 8.21 is not entirely applicable to your program it will provide you with good information concerning the kinds of radiation survey program you should have in effect. If you perform radiation survey services for your customers we would expect these surveys to be in accordance with the guidelines in Guide 8.21. Please provide additional information concerning your radiation protection procedures and radiation survey program.
6. Bioassays. Attachment 12, Items 5.3.4. and 5.3.5. in the attachment to your application provide a description of your bioassay program for employees handling tritium. Your tritium bioassay program should meet the minimum guidelines described in the enclosed GUIDELINES FOR BIOASSAYS REQUIREMENTS FOR TRITIUM and the enclosed Regulatory Guide 8.20, APPLICATIONS OF BIOASSAY FOR I-125 AND I-131. Please provide information to show that your bioassay program will meet the guidelines as described in the two (2) guides. You should note that under certain conditions bioassays are not required. If you consider bioassays are not necessary, you should provide information to justify your position.
7. Sealed source manufacturing. Attachment 3, Item 8.b.17 of your application indicates that you manufacture sealed sources. We need a description of your procedures for manufacturing these sources including descriptions of the source capsules, kinds of licensed material, and the amount of licensed material to be contained in each source.

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Our review of your application will continue upon receipt of the above information. Please provide two (2) copies of your reply and reference Mail Control No. 98306.

Sincerely,

Paul R. Guinn
License Management Branch
Division of Fuel Cycle and
Material Safety

Enclosures: As stated

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