

FEB 24 1986

Docket No. 030-22168
Control No. 104937

Eastern Connecticut State University
ATTN: Gloria J. Colurso
Department of Biology
Willimantic, Connecticut 06226-2295

Gentlemen:

This is in reference to your application dated January 15, 1986 for a byproduct material license. In order to continue our review, we need the following additional information:

1. Item 10, Paragraph VII., B. of your application appears to exempt certain packages containing licensed material from safe opening procedures. There are no exemptions from safe opening procedures in 10 CFR 20.205. Basically, 10 CFR 20.205 is divided into four parts:
 - a. Paragraph (b) refers to monitoring for surface contamination upon receipt of packages containing licensed material. This paragraph contains the exemption referred to in paragraph VII, B.
 - b. Paragraph (d) refers to procedures for safely opening packages containing licensed material. There are no exemptions in Paragraph (d).

Appendix F of Regulatory Guide 10.8 (which we have enclosed) contains a method that is acceptable to the NRC staff for implementing the regulation in 10 CFR 20.205(d), which applies to all packages containing licensed material. You cannot use the exemptions in 10 CFR 20.205(b) which apply to receiving packages, as a substitute for the procedures in Appendix F which apply to opening packages.

We will continue our review upon receipt of this information. Please reply in duplicate to my attention at the Region I office and refer to Mail Control No. 104937.

Sincerely,

Original Signed By:
Thomas K. Thompson

John E. Glenn, Ph.D., Chief
Nuclear Materials Safety Section B
Division of Radiation Safety
and Safeguards

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Enclosure:
Regulatory Guide 10.8

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Glenn
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