Courtemanche, Steven; Wutoh, Anthony K.; Cahill, Christopher; Bose, Satva R.

[External_Sender] RE: Howard University, Request for 90-Day Extension of Temporary Exemption to Regulations, Request for Additional Information (Mail Control No. 622624)

Thursday, August 6, 2020 1:03:52 PM

Good Afternoon Ms. Kaufman.

Thank you so much for taking the time to speak with me this morning. As you requested, I am providing you with additional information regarding our request to extend the regulatory relief period. Please advise me if there is anything else you may need to process this request.

In your original notification, dated April 10, 2020, requesting an exemption from Title 10 of the Code of Federal Regulations 30.34(e) and License Condition 21.A of NRC License No. 08-00386-19 (ML20105A109) and in supplemental information for the request in response to a Request for Additional Information, provided in an email received April 17, 2020 (ML20112F382), you had stated that Howard University Hospital would not be receiving shipments of radioactive materials from the loading dock.

The Howard University (HU) is currently closed. The Radiation Safety Office (RSO) does not have access to any research labs until the campus is fully open. Therefore, the RSO will not be receiving shipments of radioactive materials through the Howard University Hospital (HUH) loading dock with the purpose of carrying out research, as permitted under license # 08-00386-19.

Please state whether radioactive waste is processed through the loading dock. If so, then what compensatory measures will be in place to address the requirements of 10 CFR 20.1101, 10 CFR 20.1301, 10 CFR 20.1501, 10 CFR 20.1906, and 10 CFR 35.92.

Response:

The hospital biomedical waste is processed through the loading dock area monitors. If a waste bag is found to be radioactive, it is then stored in the hospital decay in storage room for decay prior to disposal. These wastes are generated mainly due to clinical procedures performed at the hospital, but not from research activities

Kind Regards -

Satva R. Bose, Ph.D., DABR Associate Professor, Radiation Oncology Director of Radiation Safety Radiation Safety Officer Chief Medical Physicist Interim Director of Medical Physics Program Howard University Health Sciences Washington DC 20059 Phone: (202) 806-7216 Fax: (202) 234-1375 Email: satya.bose@hi

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From: Kauffman, Laurie <Laurie.Kauffman@nrc.gov>

Sent: Thursday, August 06, 2020 8:41 AM

To: Bose, Satya R. <satya.bose@Howard.edu>

Cc: Courtemanche, Steven <Steven.Courtemanche@nrc.gov>; Wutoh, Anthony K. <awutoh@Howard.edu>; Cahill, Christopher <Christopher.Cahill@nrc.gov>

Subject: Howard University, Request for 90-Day Extension of Temporary Exemption to Regulations, Request for Additional Information (Mail Control No. 622624)

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License No.: 08-00386-19 Docket No.: 03011063 Mail Control No.: 622624

Licensee Name: Howard University

This refers to Howard University's (your) notification dated July 23, 2020. (Agencywide Document Access and Management System (ADAMS) Accession No. ML20218A766). requesting an extension of relief from regulatory requirements and license commitments during the COVID-19 pandemic. In order to continue our review of your request, the following additional information is needed:

In your original notification, dated April 10, 2020, requesting an exemption from Title 10 of the Code of Federal Regulations 30.34(e) and License Condition 21.A of NRC License No. 08-00386-19 (ML20105A109) and in supplemental information for the request in response to a Request for Additional Information, provided in an email received April 17, 2020 (ML20112F382), you had stated that Howard University Hospital would not be receiving shipments of radioactive materials from the loading dock. Please confirm that this is still the case. Also, please state whether radioactive waste is processed through the loading dock. If so, then what compensatory measures will be in place to address the requirements of 10 CFR 20.1101, 10 CFR 20.1301, 10 CFR 20.1501, 10 CFR 20.1906, and 10 CFR 35.92

In order to promptly facilitate your request, please reply via email as soon as possible and copy Steven Courtemanche. We will be unable to respond to your request until your response is received

Please respond by e-mail to acknowledge that you have received the e-mail request for additional information. In addition, I left you a voicemail to notify you to expect this email request for additional information.

Your cooperation in this matter is appreciated.

Regards,

Saurie A. Kauffman Laurie A. Kauffman, Health Physicist Commercial, Industrial, R&D and Academic Branch Division of Nuclear Materials Safety Nuclear Regulatory Commission - Region I 2100 Renaissance Blvd.

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