



DEPARTMENT OF VETERANS AFFAIRS
Veterans Health Administration (VHA)
National Health Physics Program (NHPP)
2200 Fort Roots Drive
North Little Rock, AR 72114

September 3, 2020

Bryan Parker
Materials Licensing Branch
Division of Nuclear Material Safety
Nuclear Regulatory Commission (NRC), Region III
2443 Warrenville Road, Suite 210
Lisle, Illinois 60532-4352

Re: NRC License 03-23853-01VA

Dear Mr. Parker:

We request an amendment to the referenced NRC license to incorporate proposed revisions, detailed below, to Section 5 of Standard Operating Procedure (SOP) #1, *NHPP Permit Procedures*. The proposed revision would improve our operational efficiency with respect to issuing amendments to our permittees. The requested revisions were approved by the VHA National Radiation Safety Committee at its meeting on August 5, 2020.

Proposed revisions to Section 5 of SOP #1 are provided below in markup format:

5. PREPARATION AND ISSUANCE

a. After completion of the technical review and confirmation that a permit request meets all applicable requirements, the responsible Program Manager will prepare the permit and forward a copy of the application and all supporting documents to the RCPO or to a fully qualified Permit Reviewer per NRSC SOP #4, who is designated in writing by the RCPO, for concurrence and signature. Program Managers may sign permit actions pursuant to requests made under 10 CFR 35.14 (Notifications).

b. The RCPO or a fully qualified Permit Reviewer per NRSC SOP #4, who is designated in writing by the RCPO, acting in the capacity of NRSC Executive Secretary, will sign and forward the permit action to the facility requesting the permit. The completed permit action will be imaged and archived on the NHPP headquarters file server. A copy will be maintained in the NHPP records repository, and a copy will be forwarded to NRC (if requested). Permitting actions will be reported at the next quarterly meeting of the NRSC for concurrence.

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c. *Emergency and Non-Routine Actions.*

(1) Permit actions identified by the facility as "emergency" or "time-urgent" will be processed as soon as possible using the normal procedural steps for permit actions. In the temporary absence of the RCPO, a fully qualified Permit Reviewer, who is designated in writing by the RCPO, the most senior Program Manager at the North Little Rock, Arkansas, office may sign. Such shall be reviewed for adequacy by the RCPO or a fully qualified Permit Reviewer, who is designated in writing by the RCPO, immediately upon return.

(2) Permits involving non-standard uses of radioactive material, unregistered sealed sources or devices, or other non-standard instances and uses require approval of NRC prior to issuance.

If NRC requires further information related to this amendment request, please contact me at 707-562-8374 or Thomas E. Huston., Ph.D., CHP, at 501-257-1571.

Sincerely,

Digitally signed by
Leidholdt, Ed
Date: 2020.09.03 13:37:10
-07'00'

Edwin M. Leidholdt, Jr., Ph.D., FACR
Director, VHA National Health Physics Program

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