

From: [Tran, Frank](#)
To: [Bill Peters](#)
Subject: Request for additional information for CN621136
Date: Tuesday, January 19, 2021 9:42:00 PM

Dear Dr. Peters:

After the review of your application and subsequent correspondences, we will need the following information.

1. Niowave requests authorization for sealed sources which may be required to leak tested every six months or at an interval listed in the Sealed Source and Device Registry (SSDR). Niowave provided a commitment in Section 10.8, "Surveys and Leak Tests" of the application dated May 18, 2020. However, the commitment did not specifically address the sealed source leak tests. Please provide a statement that: "Leak tests will be performed at the intervals approved by the NRC or an Agreement State and specified in the Sealed Source and Device Registration Certificate. Leak tests will be performed by an organization authorized by the NRC or an Agreement State to provide leak testing services to other licensees. Leak tests may be collected by the licensee using a leak test kit supplier's instructions. Such leak test kits will be supplied by an organization authorized by the NRC or an Agreement State to provide leak testing services."

If Niowave would like to perform leak test of its sealed sources in-house, in addition to the above statement please provide "Alternatively, we will implement the model leak test program published in Appendix J to the current NUREG-1556, Vol. 17, 'Program Specific Guidance About Special Nuclear Material of Less Than Critical Mass Licenses.'"

2. Niowave discussed the receipt and accountability of licensed material in Sections 10.4 and 10.7 of the application dated May 18, 2020; however, the information did not specifically focus on the sealed sources requested. Based on NUREG-1556, Volume 17, Revision 1, please provide the following: "Physical inventories will be conducted at intervals not to exceed 6 months, to account for all sealed sources and devices received and possessed under the license. Records of inventories will be maintained for 3 years from the date of each inventory and will include the radionuclides, quantities, manufacturer's name, model numbers, and the date of the inventory."
3. Section 5.2.2, "Recordkeeping for Decommissioning", of the application dated May 18, 2020 described the record keeping related to the decommissioning; however, it did not cover all records required by 10 CFR 70.25(g), such as records of the cost estimate and financial assurance instrument. Based on the NUREG-1556, Volume 17, Revision 1, please provide the statement: "Pursuant to 10 CFR 70.25(g) and 10 CFR 70.51(b)(3), we will maintain records important to decommissioning and transfer these records to an NRC or Agreement State licensee before licensed activities are transferred or assigned, in accordance with 10 CFR 70.36. Furthermore, pursuant to 10 CFR 70.51(a)(3), we will forward the records required by 10 CFR 70.25(g) to the

appropriate NRC regional office before the license is terminated.”

4. In Item 11, “Waste Management”, of the application dated May 18, 2020, Niowave provided that it will transfer radioactive waste containing long-lived isotopes to an authorized license. However, this section did not discuss the disposal of radioactive waste containing isotopes with less than 120 days half-life, if any. If Niowave will possess radioactive waste containing isotopes with less than 120 days half-life and will dispose them by decay-in-storage, please provide “We will use the decay-in-storage disposal waste procedure that is published in Appendix P in NUREG–1556, Volume 7, Revision 1, ‘Program-Specific Guidance About Academic, Research and Development, and Other Licenses of Limited Scope.’” If you will possess radioactive waste containing isotopes with less than 120 days half-life but will use an alternate approach to dispose it, please describe.

Please provide a response in writing with date and signature by February 2, 2021. We appreciate if you could reference Mail Control No. 621136 in the cover letter to facilitate proper mail handling in our office. If you have any questions, please reply to this email or call me at 630-829-9623.

Thank you very much.

Frank Tran

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