



**UNITED STATES  
NUCLEAR REGULATORY COMMISSION**  
REGION IV  
1600 E. LAMAR BLVD  
ARLINGTON, TX 76011-4511

March 30, 2021

Nicholas G. Childs, Ph.D.  
Assistant Teaching Professor of Physics  
Radiation Safety Officer  
Montana State University – Bozeman Campus  
123 Hamilton Hall  
Bozeman, MT 59717

SUBJECT: LICENSE AMENDMENT

Dear Dr. Childs,

Please find enclosed Amendment No. 72 to NRC License No. 25-00326-06 renewing your license in its entirety. An environmental assessment for this licensing action is not required since this action is categorically excluded under 10 CFR 51.22(c). You should review this license carefully and be sure that you understand all conditions. You can contact me at [Latischa.Hanson@nrc.gov](mailto:Latischa.Hanson@nrc.gov) if you have any questions about this license.

Please note that you should particularly review license conditions relating to authorized radioactive material use, authorized use/storage locations with dated reference letters contained in them, as well as any license condition with dated reference letters listed in them. Notify this office if you have any discrepancies or questions.

We need to request the following additional information:

- 1) Section 10 – Radiation Safety Program, Radiation Monitoring Instruments, you requested the following authorizations:

***Montana State University specifically requests authorization to perform calibrations on its inventory of radiological detection instruments. Additionally, Montana State University requests authorization to perform radiological instrument calibrations as a commercial service.***

**The enclosure transmitted herewith contains Official Use Only – Security-Related Information. When separated from this enclosure, this document is decontrolled.**

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- Submit updated procedures for instrument calibration or state that instruments will be calibrated by a vendor licensed by the NRC or an Agreement State to perform instrument calibrations. Licensees that want authorization to calibrate their own survey instruments may commit to implementing the model procedures published in Appendix H of NUREG 1556, Volume 11, Revision 1 (February 2017); and
- Describe the instrumentation that will be used to perform the required radiological surveys and state that: “We will use instruments that meet the radiation monitoring instrument specifications published in Appendix F of NUREG–1556, Volume 18, Revision 1, ‘Consolidated Guidance About Materials Licenses: Program-Specific Guidance About Service Provider Licenses.’ We reserve the right to upgrade our survey instruments as necessary.”; or
- Describe the instrumentation that will be used to perform the required radiological surveys and state, “We will use instruments that meet the radiation monitoring instrument specifications published in Appendix F NUREG–1556, Volume 18, Revision 1, ‘Consolidated Guidance About Materials Licenses: Program-Specific Guidance About Service Provider Licenses.’ Additionally, we will implement the model radiation survey meter calibration program published in Appendix F of NUREG–1556, Volume 18, Revision 1, ‘Consolidated Guidance About Materials Licenses: Program-Specific Guidance About Service Provider Licenses.’ We reserve the right to upgrade our survey instruments as necessary.”; or
- Describe the instrumentation that will be used to perform the required radiological surveys and state, “We will use instruments that meet the radiation monitoring instrument specifications published in Appendix F NUREG–1556, Volume 18, Revision 1, ‘Consolidated Guidance About Materials Licenses: Program-Specific Guidance About Service Provider Licenses.’ Additionally, we will implement the model radiation survey meter calibration program published in Appendix F of NUREG–1556, Volume 18, Revision 1, ‘Consolidated Guidance About Materials Licenses: Program-Specific Guidance About Service Provider Licenses.’ We reserve the right to upgrade our survey instruments as necessary.”; or
- Describe alternative equipment and/or procedures for ensuring that appropriate radiation-monitoring equipment will be used during licensed activities, and that proper calibration and calibration frequency of survey equipment will be performed. Include a statement that: “We reserve the right to upgrade our survey instruments as necessary.”; and
- commit to retain records of the calibration of instruments and equipment used for quantitative radiation measurements for 3 years after the record is made in accordance with 10 CFR 20.2103(a).

<https://www.nrc.gov/reading-rm/doc-ollections/nuregs/staff/sr1556/v18/index.html>

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2) **Mossbauer spectroscopy system:**

- Submit the Sealed Source & Device Registry certificate you have regarding the sealed sources you listed as used in this system:
  - **RITVERC GmbH, Model MCo7115**

The NRC's Safety Culture Policy Statement became effective in June 2011. While a policy statement is not a regulation, it sets forth the agency's expectations for individuals and organizations to establish and maintain a positive safety culture. You can access the policy statement and supporting material that may benefit your organization on NRC's safety culture Web site at [www.nrc.gov/about-nrc/regulatory/enforcement/safety-culture.html](http://www.nrc.gov/about-nrc/regulatory/enforcement/safety-culture.html). We strongly encourage you to review this material and adapt it to your particular needs in order to develop and maintain a positive safety culture as you engage in NRC-regulated activities.

NRC expects licensees to conduct their programs with meticulous attention to detail and a high standard of compliance. Because of the serious consequences to employees and the public that can result from failure to comply with NRC requirements, you must conduct your radiation safety program according to the conditions of your NRC license, representations made in your license application, and NRC regulations. In particular, note that you must:

1. Operate by NRC regulations 10 CFR Part 19, "Notices, Instructions and Reports to Workers: Inspection and Investigations," 10 CFR Part 20, "Standards for Protection Against Radiation," and other applicable regulations.
2. Notify NRC in writing of any change in mailing address.
3. By 10 CFR 30.36(d) and/or license condition, notify NRC, promptly, in writing, and request termination of the license:
  - a. When you decide to terminate all activities involving materials authorized under the license whether at the entire site or any separate building or outdoor area;
  - b. If you decide not to acquire or possess and use authorized material; or
  - c. When no principal activities under the license have been conducted for a period of 24 months.
4. Request and obtain a license amendment before you:
  - a. Change Radiation Safety Officers;
  - b. Order byproduct material in excess of the amount, radionuclide or form authorized on the license;
  - c. Add or change the areas or address(es) of use identified in the license application or on the license; or

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- d. Change the name or ownership of your organization.
5. Submit a complete renewal application or termination request at least 30 days before the expiration date on your license. You will receive a reminder notice approximately 90 days before the expiration date. Possession of radioactive material after your license expires is a violation of NRC regulations.

In addition, please note that NRC Form 313 requires the applicant, by signature, to verify that the applicant understands that all statements contained in the application are true and correct to the best of the applicant's knowledge. The signatory for the application should be the licensee or certifying official rather than a consultant. Since the NRC also accepts a letter requesting amendment of an NRC license, the signatory for such a request should also be the licensee or certifying official rather than a consultant.

NRC will periodically inspect your radiation safety program. Failure to conduct your program according to NRC regulations, license conditions, and representations made in your license application and supplemental correspondence with NRC may result in enforcement action against you. This could include issuance of a notice of violation; imposition of a civil penalty; or an order suspending, modifying, or revoking your license as specified in the NRC Enforcement Policy. The NRC Enforcement Policy is available at: [www.nrc.gov/about-nrc/regulatory/enforcement/enforce-pol.html](http://www.nrc.gov/about-nrc/regulatory/enforcement/enforce-pol.html).

NRC's Regulatory Issue Summary (RIS) 2005-31, Revision 1, provides criteria to identify security-related sensitive information and guidance for handling and marking of such documents. This ensures that potentially sensitive information is not made publicly available through the NRC's Agencywide Documents Access and Management System (ADAMS). The RIS may be located on the NRC Web site at: [www.nrc.gov/reading-rm/doc-collections/gen-comm/reg-issues/2005/](http://www.nrc.gov/reading-rm/doc-collections/gen-comm/reg-issues/2005/). Pursuant to NRC's RIS 2005-31, Revision 1, the enclosed materials license will not be made publicly available.

Thank you for your cooperation.

Sincerely,

*/RA/*

Latischa M. Hanson, M.Sc., Health Physicist  
Materials Licensing and Decommissioning  
Branch

Docket: 030-00871  
License: 25-00326-06  
Control: 622931

Enclosure: As stated

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