

From: [Tran, Frank](#)
To: [Krzyaniak, Nathan A CIV USARMY TACOM \(USA\)](#)
Subject: Request for additional information for NRC License No. 21-32838-01
Date: Thursday, March 11, 2021 2:26:00 PM

Dear Mr. Krzyaniak:

This refers to the amendment request dated January 28, 2021 for NRC License No. 21-32838-01. We have reviewed the application and have the following concern.

Title 10 of the Code of the Federal Regulations (10 CFR) 20.1501 (a) states that each licensee shall make or cause to be made, surveys of areas, including the subsurface, that

- (1) May be necessary for the licensee to comply with the regulations in this part; and
- (2) Are reasonable under the circumstances to evaluate—
 - (i) The magnitude and extent of radiation levels; and
 - (ii) Concentrations or quantities of residual radioactivity; and
 - (iii) The potential radiological hazards of the radiation levels and residual radioactivity detected.

License Condition 13.D. states that no sealed source shall be stored for a period of more than 10 years without being tested for leakage and/or contamination; the sealed sources discussed here are not radioactive waste. This requirement relates to the sealed sources which have been in storage and not being used; but they may be used in the future or transferred to other authorized licenses in accordance with 10 CFR 30.41, "Transfer of byproduct material". The purpose of the requirement is to detect a contamination in the storage area where the sealed sources undergo an aging process and to mitigate the extend of the contamination, if any, for the health and public and environment safety.

If you consider the sealed sources in the question are radioactive waste, they can be disposed of in accordance with Section 20.2006 in Subpart K, "Waste Disposal", to 10 CFR part 20. License Condition 13 does not apply to radioactive waste.

The Limitations in the Sealed Source and Device Registry (SSDR) MD-0263-D-102-G requires a leak test every six months; this does not apply to your license which is specific, not general. The NR-1129-D-802-S and NR-1129-D-801-S which apply to your licensed material requires the areas where the cell modules are repaired or stored should be tested for removable contamination at a time interval to be determined by the Department of the Army. However, we could not locate information related to the removeable contamination monitoring for the areas where the cell modules (devices) are stored in your applications.

Note that, the NRC policy is to release an area for unrestricted use if the area was used or stored only sealed sources which License Condition 13.C. did not apply and has no records of leaking source for the area (see NRC Form 314 for references).

Based on the above, we will need the following.

1. A confirmation that cell modules (devices) which will be used in the future or transferred in accordance with 10 CFR 30.41 are kept and stored separate from the radioactive waste.
2. A description of the removeable contamination monitoring for the storage areas and the survey frequency to ensure contamination, if any, timely detected and mitigated.
3. A description of the removeable contamination monitoring for the waste storage areas and the survey frequency.
4. Based on the SSDR associated with the device(s), the expected useful life of the device(s) is 15 years. Please address the sealed sources leak test to monitor the removeable contamination for the device(s), with a more focus on device(s) older than 15 years. If you will not use the device(s) beyond their useful life of 15 years, please state.

To continue review of your application, we request that you submit your response with date and authorized signature to this correspondence by April 1, 2021. In your response, please refer the license number, docket number and Mail Control No. 624448. We will assume that you do not wish to further pursue this licensing action if we do not receive a reply within the specified timeframe noted above.

If you have questions, require additional time to respond, or require clarification on any of the information stated above, please contact me at 630-829-9623 or reply to this email.

In accordance with Title 10 of the *Code of Federal Regulations* (10 CFR) 2.390 of the NRC's "Rules of Practice," a copy of this correspondence will be made available electronically for public inspection in the NRC Public Document Room or from the NRC's Agencywide Documents Access and Management System (ADAMS), accessible from the NRC Web site at <https://www.nrc.gov/reading-rm/adams.html>.

Best regards,

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