

From: [Tran, Frank](#)
To: ["Western, Evan"](#)
Subject: Request for additional information for NRC License No. 34-31473-03MD (Attn: CN624739)
Date: Friday, April 30, 2021 8:47:00 AM

Dear Mr. Western:

We have reviewed your amendment request dated February 26, 2021 for NRC License No. 34-31473-03MD for Cardinal Health 414, LLC. We will need additional information to complete our review.

1. It appears that your licensed material quantity meets the threshold set forth in 10 CFR 30.72; therefore, in accordance with 10 CFR 30.32(i) you must submit an emergency plan or an evaluation showing that the maximum dose to a person offsite due to a release of radioactive materials (in a worst case accident scenario) would not exceed 1 rem effective dose equivalent or 5 rems to the thyroid. Helpful information regarding the emergency plan could be found in Section 8.5.1 in NUREG-1556, Volume 13, Revision 2.
2. Regarding the proposed facility (Suite 500), please describe: i) the radiation shielding which will be utilized for the hot cells, ii) how licensed material will be transferred between the hot cells and the Solution Prep room or Dispensing rooms, and iii) dimensions or scale for the facility diagrams. In addition, provide a confirmation that fume hoods and hot cells will be built, tested, operated and maintained in accordance with manufacturer manuals and applicable industrial standards or codes.
3. Regarding the proposed upgraded ventilation system and expanding in licensed material and licensed activities, please reevaluate the air effluent release to ensure that the release meets the requirements in 10 CFR 20.1101. You could provide a hand calculations or a report from the use of an acceptable industrial code (software), including all reasonable assumptions (i.e., maximum licensed material released, maximum release air concentration, minimum flow rate, minimum wind speed, minimum release point height, urban area, surrounding building height, etc.) Additionally, provide i) a confirmation that the ventilation system including, but not limited to, exhaust fans, decay plenum, HEPA filters, activated carbon filters, and air effluent release monitor system will be installed, tested, operated and maintained in accordance with manufacturer manuals and applicable industrial standards or codes, ii) the minimum different pressures between the designated areas (negative pressure rooms) and the surrounding unrestricted areas, and iii) a description of the procedures for monitoring filter blockage and exchange.
4. The NRC considers the person responsible for the radiation protection program is the RSO. The RSO is the key to overseeing and ensuring safe and secure operation of the licensee's radiation protection program. The responsibilities of the RSO may not be transferred to other individuals. Many tasks and duties associated with managing the program may be assigned or delegated to other qualified individuals; however, the responsibility for these tasks and duties remains with the RSO. The NRC

recognizes that a qualified individual will on occasion fill in for the RSO when the RSO is away for short periods of time (e.g., professional conferences, vacation, illness). Absences that have a major impact on licensed activities should not occur for extended or indefinite periods of time.

Please confirm that the Alternate RSO will only act on behalf of the RSO when the RSO is absent for a short period of time and that the RSO is the main person responsible for the radiation protection program. Provide i) a copy of a bachelor degree diploma in science or engineering or describe equivalent training and experience in physical, chemical, or biological sciences or in engineering for Mr. Kevin Stahl, and ii) information that he has been trained with tasks associated with duties and responsibilities of RSO applicable to your program listed in Appendix D to NUREG-1556, Volume 13, Revision 1, including name of the qualified trainer(s) and the duration of the training.

5. You provided that radioactive waste will be compacted in the Waste Processing and Decay area. Please provide i) description of the compactor (manufacturer's specifications, annotated sketches or photographs, and other information about the compactor design), ii) the type, quantities, and concentrations of waste to be compacted, an analysis of the potential for airborne release of radioactive material during compaction activities, iii) the methods used to monitor worker breathing zones in this area, iv) the types and frequencies of surveys that will be performed for contamination control in the compactor area, and v) a discussion of the instruction provided to compactor operators, including instructions for protective clothing, checks for proper functioning of equipment, method of handling uncompacted waste, and method of examining containers for defects.

We would appreciate if you could provide the response by May 20, 2021. In your response, please refer the license number, docket number and Mail Control No. 624739. If you have any questions, please feel free to reply to this email or call me at 630-829-9623.

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>.

Thank you,

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