



**UNITED STATES
NUCLEAR REGULATORY COMMISSION**
REGION I
2100 RENAISSANCE BLVD.
KING OF PRUSSIA, PA 19406-2713

July 20, 2021

Chad Gunther, COO/QA Director
C&C Irradiator Service, LLC
1030 Evarts Street, NE
Washington, DC 20018

SUBJECT: C&C IRRADIATOR SERVICE, LLC, LICENSE AMENDMENT, MAIL CONTROL
NO. 627066

Dear Mr. Gunther:

This is in reference to your letter dated June 7, 2021, requesting to amend NRC License No. 08-35447-01. In order to continue our review, we need the following additional information:

1. You requested to add a custom device, a Mk 1-30 SN 668 located at University of Wisconsin Madison, for decommissioning and stated that there will be no source handling, transfer, cutting, or grinding near the source or source assembly.
 - a. Your current license does not list decommissioning as an authorized activity. On your list of "Authorized Work Activities" attached to the amendment request, you list this irradiator in the first group for which preventive maintenance and service work will be performed. Please review the authorized uses listed in Item 9 of the license and explain if "decommissioning" is covered by the current authorized uses. Alternately, describe the activities that will be performed during decommissioning, and the radiological safety procedures for decommissioning.
 - b. You stated that this device has been retrofitted with a tower not supplied by the original equipment manufacturer. Confirm if a custom sealed source and device (SSD) registration was issued for this device and provide the SSD registration number. If no registration was issued, please provide the following:
 - i. A description of the modification and any impact on radiation shielding or source movement.
 - ii. A description of the training you have received on this modified device.
2. During our review of the current license, we identified the following discrepancies:
 - a. On your list of devices, you have listed J.L. Shepherd Model 142-MA in the first group and Model J.L. Shepherd Model 142 in the second group. However, Condition 10 of the license lists only the Model 142. Confirm if both models should be listed in Condition 10.

- b. On your list of devices, you have listed CIS-US Model IBL 437 in the first group, but model CIS-US Model IBL 437C is listed on the license. The SSDR listed on your request is for Model 437C and we are unaware of an SSD registration for a Model 437. Confirm if Model 437 is the model you had requested, or if it should be Model 437C.

We will continue our review upon receipt of this information. Please reply to the attention of:

Juan Ayala, Health Physicist
Mail Control No. 627066
USNRC, Region I
Division of Radiological Safety and Security
2100 Renaissance Boulevard
King of Prussia, PA 19406

or you may send a pdf of the signed letter by electronic mail to

R1DRSSMail.Resource@nrc.gov
Reference – Juan Ayala
Mail Control No. 627066

In order to continue prompt review of your application, we request that you submit your response to this letter within 30 calendar days from the date of this letter.

An electronic version of the NRC's regulations is available on the NRC Web Site at: www.nrc.gov. Additional information regarding use of radioactive materials may be obtained on the NRC Web Site at: <http://www.nrc.gov/materials/miau/mat-toolkits.html>. This site also provides the link to the toolbox for updated information on the revised regulations for naturally-occurring and accelerator-produced radioactive materials (NARM).

In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice," a copy of this letter will be available electronically for public inspection in the NRC Public Document Room or from the NRC's document system (ADAMS). ADAMS is accessible from the NRC Web Site at: <http://www.nrc.gov/reading-rm/adams.html>. Please be aware that you may request that certain portions of your submittal to NRC be withheld from public disclosure as proprietary information. To do this, you must execute an affidavit as specified in 10 CFR 2.390. You must list all portions that you wish to be held proprietary, along with your reasoning as to why that is appropriate. While it is allowable, please refrain from submitting proprietary information in support of a license unless necessary. Keep in mind that all NRC licenses are considered to be in the public domain, and therefore may be viewed by any member of the public who requests to see them.

If you have any questions regarding this request for additional information, please contact Juan Ayala at (610) 337-6927 or by email to Juan.ayala@nrc.gov or to me at (610) 337-5040 or Elizabeth.Ullrich@nrc.gov.

Thank you for your cooperation.

Sincerely,

Betsy Ullrich, Senior Health Physicist
Commercial, Industrial, R&D
and Academic Branch
Division of Radiological Safety and Security
Region I

Docket No. 030-39072
License No. 08-35447-01
Mail Control No. 627066

cc: C. Nostrand, CEO/RSO

C&C IRRADIATOR SERVICE, LLC, LICENSE AMENDMENT, MAIL CONTROL NO. 627066
DATED JULY 20, 2021

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SUNSI Review Complete: Betsy Ullrich

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