

**From:** [Register, Cade](#)  
**To:** [LaFranzo, Michael](#)  
**Cc:** [Houts, Todd A.](#); [Wilson, Charles](#)  
**Subject:** [External\_Sender] Follow-up to October 5th Phone Call Between MU and the NRC  
**Date:** Wednesday, October 13, 2021 1:53:18 PM  
**Attachments:** [image001.png](#)

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Mike,

During our phone call on October 5, we discussed the possibility of moving responsibility for the Pickard Hall decommissioning to Chase. To clarify, we are not transferring Pickard Hall and all responsibility for decommissioning to Chase. We will, however, be making minor adjustments to the descriptions of certain activities within the Pickard Hall Decommissioning Plan (PHDP). I hope this allows you to move forward reviewing all of the RAI responses as they are submitted.

Here is the current list of the proposed changes:

- Page 2 of the DP states “Decommissioning activities will be conducted under the provisions of the MU broad scope radioactive materials license number 24-00513-32.”

We are changing this to “Decommissioning work will be performed by Chase Environmental Group, Inc. (Chase) under contract with MU. Chase activities will be performed by trained and qualified personnel under the terms and conditions of Chase’s Commonwealth of Kentucky Radioactive Materials License number 201-605-15, as described in Section 8.0 below. Reciprocity will be applied for and granted prior to performing decommissioning activities. As the licensee for Pickard Hall, MU will oversee Chase’s decommissioning activities and will maintain responsibility for surrounding property maintenance, fire, utility shutoff, security, and other functions. There will be clear separation of licensed activities between Chase and MU, and activities will be coordinated such that neither violates the license of the other.”

- Page 39 of the DP states “Licensed decommissioning activities will be performed under the MU broad scope radioactive material license and the PHDP Radiation Safety Manual (RSM). Chase will provide assistance to MU in the design and performance of decommissioning.”

We are changing this to “MU has retained Chase to provide decommissioning services to include performing final status surveys to demonstrate compliance with the release criteria. Radiological work will be performed under Chase's Commonwealth of Kentucky Radioactive Materials License number 201-605-15 utilizing a reciprocal agreement with the NRC. All decommissioning activities will be performed in accordance with this DP, Chase’s Radioactive Materials License, and NRC regulations.”

- Page 41 of the DP states “Decommissioning activities will be conducted under the provisions of the MU radioactive materials license and in accordance with this DP. Activities involving licensed material will be conducted in accordance with written and approved procedures, work plans, RWP, and/or FSS survey packages to ensure adequate worker protection and to comply with the radioactive materials license and this DP.”

We are changing this to “Decommissioning activities will be conducted under the provisions of Chase's Commonwealth of Kentucky Radioactive Materials License number 201-605-15 and in accordance with this DP. Activities involving licensed material will be conducted in accordance with written and approved procedures, work plans, RWP, and/or FSS survey packages to ensure adequate worker protection and to comply with the radioactive materials license and this DP.”

- Page 46 of the DP states “8.4 Project Training Requirements – Chase will provide all project personnel with radiation worker training required by the radioactive materials license, as well as training for project-specific programs, plans, and procedures. 8.4.1 Radiological Training – Radiological training will be completed and documented in accordance with MU license requirements. The PM will maintain a copy of each individual’s certification on site in the project file.”

We are changing this to “8.4 Project Training Requirements – Chase will provide all project personnel with radiation worker training required by the radioactive materials license, as well as training for project-specific programs, plans, and procedures. 8.4.1 Radiological Training – Radiological training will be completed and documented in accordance with Chase license requirements. The PM will maintain a copy of each individual’s certification on site in the project file.”

Please let me know if you have any questions.

Thank you,

**Cade Register**

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