



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

November 22, 2021

Jason C. White, Director
The Connecticut Agricultural Experiment Station
123 Huntington Street,
New Haven, CT 06511-2016

**SUBJECT: THE CONNECTICUT AGRICULTURAL EXPERIMENT STATION, REQUEST
FOR ADDITIONAL INFORMATION, MAIL CONTROL NO. 628239**

Dear Mr. White:

This is in reference to your application dated July 26, 2021, requesting to renew NRC License No. 06-03754-01. In order to continue our review, we need the following additional information:

1. The following refer to Sections 5 and 6 of our application, which describe the materials to be authorized and their uses:
 - a. You requested the use of authorized materials in small animals. Confirm that, if licensed material will be used in animals, you will follow the applicable guidance Appendix D of NUREG-1556, Volume 7, Appendix D, "Guidance for Laboratory Animal and Veterinary Medicine Uses." Alternately, you may provide equivalent procedures for our review.
 - b. Condition 16 of your current license limits the use of C14 to the field studies described in the letter dated December 7, 1984. Confirm that you understand that any new or different field studies from those described in that letter, must be approved by the NRC prior to implementation.
 - c. As stated in your application, the items that are under a general license or are exempt from licensing requirements will not be listed on the specific license.
2. Section 7 of your application did not list Dr. Blair Steven, who is presently listed on the license. Please either confirm: (1) you wish for Dr. Steven to be removed from your list of Authorized Users; or (2) you wish to maintain Dr. Steven on the NRC license.
3. In accordance with NUREG-1556, Volume 7, Revision 1, Section 8.8 "Training for Individuals Working in or Frequenting Restricted Areas," please provide a description for how you will assess the effectiveness of training.
4. In accordance with NUREG-1556, Volume 7, Revision 1, Section 8.10.4, "Occupational Dose," confirm that you will monitor individuals for internal dose when quantities and forms of tritium are handled that could result in an uptake. Regulatory guide 8.32 "Criteria for Establishing a Tritium Bioassay Program" suggests bioassay be performed if more than 100 millicuries of H3 is handled at one time on a benchtop, and more than 1 curie in a hood or other enclosure

5. Section 10.c., "Occupational Dose" of your application states that you will monitor individuals in accordance with the current guidance in NUREG_1556 Volume 7, Revision 1. Because you stated this, we will consider that references to the potential use of film badges could be substituted by thermoluminescent dosimetry (TLD), optically-stimulated luminescent dosimeters, or other equivalent methods. No response to this is necessary because of the standing regulatory requirement in 10 CFR 20.1501(d) which, with some exceptions, requires personnel dosimetry to be supplied by a dosimetry processor that is NVLAP accredited for the type(s) of radiations for which individuals are being monitored.

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

Betsy Ullrich
Mail Control No. 628239
USNRC, Region I
Division of Radiological Safety and Security
2100 Renaissance Boulevard
King of Prussia, PA 19406

Alternately, you may attach a pdf of your signed response to email which is sent directly to Elizabeth.Ullrich@nrc.gov.

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 and Procedure," 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.

J. White

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If you have any questions regarding this request for additional information, please contact me at (610) 337-5040 or via electronic mail at 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

License No. 06-03754-01

Docket No. 030-03787

Mail Control No. 628239

cc: Joseph Pignatello, Radiation Safety Officer

THE CONNECTICUT AGRICULTURAL EXPERIMENT STATION, REQUEST FOR
ADDITIONAL INFORMATION, MAIL CONTROL NO. 628239 DATED NOVEMBER 22, 2021

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SUNSI Review Complete: Betsy Ullrich

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DATE	11/17/2021 (JEV)				11/22/21 exu			

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