



UNITED STATES
NUCLEAR REGULATORY COMMISSION

REGION III
2443 WARRENVILLE RD. SUITE 210
LISLE, IL 60532-4352

January 7, 2022

Jeffrey L. Hirsch
Radiation Safety Officer
Confluence Discovery Technologies, Inc.
STE. 400
St. Louis, MO 63110

Dear Mr. Hirsch:

We have reviewed the licensee's request dated September 9, 2021, to renew its U.S. Nuclear Regulatory Commission (NRC) Material License No. 24-32829-01 for Confluence Discovery Technologies, Inc.

Based on our review of the information, we have identified that additional information is needed to proceed with the renewal process. Please refer to NUREG 1556, Volume 7, Revision 1, "Consolidated Guidance About Materials Licenses: Program-Specific Guidance About Academic, Research and Development and Other Licenses of Limited Scope," which is accessible at <https://www.nrc.gov/reading-rm/doc-collections/nuregs/staff/sr1556/v7/index.html> for guidance when preparing your response.

In a signed by management and dated letter, please provide the following information by February 7, 2022:

1. Please expand/provide details regarding your research and development activities.
2. Please specify whether I-125 is volatile.

If any radioactive material is used in a volatile form, please provide description of any specialized equipment such as fume hoods and the schematics/description of the ventilation system, filtration equipment, monitoring systems, etc.

3. Please provide a Delegation of Authority Letter signed by management and the Radiation Safety Officer (RSO). Please see Appendix E in NUREG 1556, Volume 7, Revision 1 for a sample letter.

Please note that we do not name Assistant RSO's on the license.

4. Please name the individuals authorized to use the material (there is no need to provide their qualifications at this time unless you are requesting to add a new individual as an Authorized User in Condition No. 12).
5. Please provide the dimensions of the laboratory where radioactive material is used.
6. Please describe methods to control and secure the material when in storage.

7. Radiation Monitoring Instruments:

Please provide the statement, "We will use instruments that meet the radiation monitoring instrument specifications published in Appendix I in NUREG–1556, Volume 7, Revision 1, Program-Specific Guidance About Academic, Research and Development, and Other Licenses of Limited Scope. We reserve the right to upgrade our survey instruments as necessary."

8. Instrument Calibration:

Please provide the statement, "Instruments will be calibrated before first use, at least annually thereafter, and after any repair, by a vendor that the NRC or an Agreement State has licensed to perform instrument calibration."

OR

"We will implement the model radiation survey meter calibration program published in Appendix I in NUREG–1556, Volume 7, Revision 1, Program-Specific Guidance About Academic, Research and Development, and Other Licenses of Limited Scope."

9. Material Receipt and Accountability:

Please provide the statement, "We will develop, implement, and maintain procedures for ensuring accountability of licensed materials at all times."

10. Occupations Dose:

Please provide the statement, "We will maintain, for inspection by the NRC, documentation demonstrating that unmonitored individuals are not likely to receive a radiation dose in excess of the limits in 10 CFR 20.1502."

OR

"We will monitor individuals in accordance with the guidance in the section titled, 'Radiation Safety Program–Occupational Dose' in NUREG–1556, Volume 7, Revision 1, Consolidated Guidance About Materials Licenses: Program-Specific Guidance About Academic, Research and Development and Other Licenses of Limited Scope."

11. Safe Use of Radionuclides, Security, and Emergency Procedures:

Please provide the statement, "We will develop, implement, and maintain procedures for safe use, security and emergencies."

OR

"We will adopt the procedures for the safe use of radionuclides, security and emergencies as published in Appendix L in NUREG–1556, Volume 7, Revision 1, Program-Specific Guidance About Academic, Research and Development, and Other Licenses of Limited Scope."

12. Surveys:

Please provide the statement, "We will survey our facility and maintain contamination levels in accordance with the survey frequencies and contamination levels published in Appendix M in NUREG-1556, Volume 7, Revision 1, Program-Specific Guidance About Academic, Research and Development, and Other Licenses of Limited Scope."

In accordance with Title 10 of the *Code of Federal Regulations* (CFR) 2.390, a copy of this letter and its enclosure will be available electronically for public inspection in the NRC Public Document Room or from ADAMS, accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html>.

Sincerely,

Magdalena R. Gryglak
Health Physicist
Materials Licensing Branch

License No. 24-32829-01
Docket No. 030-38464