

From: [Tran, Frank](#)
To: "M Srinivasan"
Subject: Request additional information for NRC License No. 21-00741-08
Date: Friday, February 11, 2022 3:01:00 PM

Dear Ms. Srinivasan:

We have reviewed the license renewal applications for NRC License No. 21-00741-08 for Wayne State University in accordance with the licensing guidance in NUREG-1556, Volume 11, Revision 1 and Volume 7, Revision 1. Electronic copies of those guidance can be downloaded from the NRC's website at <https://www.nrc.gov/reading-rm/doc-collections/nuregs/staff/sr1556/index.html>. Based on the review, we will need the following.

1. The organizational chart provided was unreadable. Please resubmit a legible copy of the organizational chart that describes the management structure, reporting paths, and the flow of authority between executive management, the Radiation Safety Committee (RSC), and the Radiation Safety Officer (RSO).
2. Wayne State University requests the flexibility to make some program changes and revise some procedures (including but not limited to the Health Physics Manual) as referenced in the renewal application. Please confirm the following: Wayne State University may revise its radiation protection program without Commission approval if--
 - (1) The revision, including the reason for the change and summarize the radiation safety matters that were considered prior to approval of the change, does not require a license amendment;
 - (2) The revision is in compliance with the regulations and the license;
 - (3) The revision has been reviewed and approved by the RSC;
 - (4) The affected individuals are instructed on the revised program before the changes are implemented; and
 - (5) Record of each change will be retained for 5 years. The record must include a copy of the old and new procedures; the effective date of the change; and the approval of the change.
3. Provide the following statement: "Pursuant to 10 CFR 30.35(g), 10 CFR 40.36(f), and/or 10 CFR 70.25(g) and 10 CFR 70.51(b)(3), we will maintain records important to decommissioning and transfer these records to an NRC or Agreement State licensee before licensed activities are transferred or assigned in accordance with 10 CFR 30.34(b), 10 CFR 40.46, and/or 10 CFR 70.36. Furthermore, pursuant to 10 CFR 30.51(f), 10 CFR 40.61(f), and /or 10 CFR 70.51(a)(3), prior to license termination, we will forward the records required by 10 CFR 30.35(g), 10 CFR 40.36(f), and/or 10 CFR 70.25(g) to the appropriate NRC Regional Office."
4. Throughout the application, Wayne State University referenced NUREG-1556,

Volume 7 or 11 but not the current licensing guidance NUREG-1556, Volume 7, Revision 1 or NUREG-1556, Volume 11, Revision 1. Provide a confirmation that the NUREG-1556, Volume 7 and 11 referenced in renewal application are NUREG-1556, Volume 7, Revision 1 and NUREG-1556, Volume 11, Revision 1.

5. Provide a statement that Wayne State University will implement the recommendations in NUREG-1556, Volume 7, Revision 1 and NUREG-1556, Volume 11, Revision 1, as applicable, as Wayne State University committed to follow, adopt, or implement.
6. Wayne State University requests to compact the radioactive waste. Please provide the following:
 - (1) Provide manufacturer's name and specifications for the compactor, annotated sketches or photographs, and other information about the compactor design.
 - (2) Provide an analysis of the potential for airborne release of radioactive material during compaction activities.
 - (3) Provide a description of the ventilation and filtration systems used in conjunction with the compactors. Include a description of the procedures for monitoring filter blockage and exchange.
 - (4) Discuss the methods used to monitor worker breathing zones and/or exhaust systems.
 - (5) Discuss the types and frequencies of surveys that will be performed for contamination control in the compactor area.
 - (6) Discuss the instruction provided to compactor operators, including instructions for protective clothing, checks for proper functioning of equipment, method of handling uncompacted waste, and examining containers for defects.
7. Item 10.6. of the application referenced Appendix S and Appendix T for the topics related to the facility radiation survey and sealed source leak test. It appeared the references were incorrect. Those should be Appendix L and Appendix M, respectively, in NUREG-1556, Volume 11, Revision 1. Please correct Item 10.6. and resubmit.
8. Provide the following statement: "In addition to the possession limits listed in the license, Wayne State University shall further restrict the possession of licensed material to quantities below the limits specified in 10 CFR 30.72 which require consideration of the need for an emergency plan for responding to a release of licensed material."
9. Wayne State University requests to remove sodium-22 listed in Item 6.O. from the license; however, Wayne State University is in possession of some sealed sources

containing very small quantity of sodium-22 in storage waiting for disposal. Therefore, sodium-22 will remain in the license until it is disposed.

To continue review of your application, we request that you submit the response under a dated and signed cover letter by March 14, 2022. In the cover letter, please refer the license numbers, docket numbers and Mail Control No. 628904. If you have questions, require additional time to respond, or require clarification on any of the information stated above, please contact me at 630-829-9623 or reply to this email.

In accordance with 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>.

Sincerely,

Frank Tran

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