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June 07, 2022

To: Betsy Ullrich, Senior Health Physicist
U.S. Nuclear Regulatory Commission – Region 1
2100 Renaissance Boulevard, Suite 100
King of Prussia, PA 19406-2713

RE: Amendment to Byproduct Materials License (License No. 07-30584-01)

Dear Ms. Ullrich:

With regards to your requests for additional information pertaining to the NRC license amendment for QPS, LLC (License No. 07-30584-01), please note the following:

Request 1: *Please submit the results of surveys of the lab at DPT1 to be removed from your license and released for unrestricted use.*

QPS Response: please find the decommissioning checklist and associated wipe tests attached.

Request 2) *Also, the letter provided information for additional QPS Permit Holders (PIs or "authorized users" listed on the NRC license) Anderson and LeSieur. It also stated that Fafard no longer works at QPS. I assume you want Fafard removed from the license. However, no mention was made of Welch although the qualifications for Anderson, LeSieur and yourself were included in the application. Is this individual still at QPS and to remain on the license?*


QPS Response: I apologize that my original request was unclear. Please allow me to reiterate.

- Yes, we are leaving Brian Anderson as the PCC permit holder (he was previously listed as such on the license).
- Yes, please remove Jeremy Fafard from the license as he left QPS. In his stead, we are inserting Lana LeSieur to be listed as the DTP-3 PI (our term: "Permit Holder" or PH) on the license.
- Finally, please also remove Patty Welch, the former DTP-1 PH, from the license since DTP-1 will no longer be using radioactivity. Thereby, the amended license should reflect:

Myself as RSO

Brian Anderson as PCC Permit Holder

Lana LeSieur as DTP-3 Permit Holder



No other personnel are to be listed as "Permit Holders" (site responsible parties) on the license amendment.

Please let me know if anything else is unclear in any way.

Best Regards,



Brad Willis, D.V.M.
Sr. Manager, Animal Resources, Laboratory & Facility Management
QPS, LLC Radiation Safety Officer

bhw

cc:

Brian Anderson, Radiation Safety Committee Chair
Kevin Barrett, CIH, CSP, Safety, Health and Environmental Manager

Radioactive Material Laboratory Decommissioning Checklist

QPS, LLC Radiation Safety Program

Permit Holder: Patty Welch

Lab/Area: DTP1 / Lab 244

- The QPS Radiation Safety Officer (RSO) must be contacted as soon as the Permit Holder (PH) or Principal Investigator (PI) or designee knows that they are planning on vacating a laboratory or halting research using radioactive materials (RM) in order to arrange for a "Radioactive Contamination Release Audit and Signature".
- Determine and set the last day of active isotope use (enter date). 14 Oct 2021
- Following the date noted above, if the PH or PI is halting research using RM, all radioactive material (RAM) must be removed and secured by either transfer to an eligible PH/PI or disposal as radioactive waste. RAM includes stock material, samples from ongoing and/or past studies and waste. If you wish to transfer any radioactive material to another site/laboratory, consult with the RSO prior to the transfer so transfer and shipping paperwork can be completed and the RAM Inventory Log can be adjusted.
- Radioactive waste should be properly packaged, tagged and transported to the appropriate QPS disposal site (e.g., Pencader).
- All equipment marked as potentially contaminated must either be transferred to an eligible PH/PI or surveyed, decontaminated and tagged if necessary and available for RSO verification survey. Equipment may include refrigerators, freezers, incubators, centrifuges, etc. An equipment list showing origination, survey status, and destination (and new PH – if applicable) should be attached to this checklist.
- Conduct an extensive wipe test survey for removal of contamination over the entire laboratory along with areas where RAM was used and stored. Survey areas should include but are not limited to floor, walls, bench tops, sinks, door knobs, hoods, drawers and cabinets. Document each wipe test collected during this process and indicate each location on the 'Radiation Safety Survey/Wipe Test Diagram' and attach a copy of the scintillation counter printout.
- Decontaminate any areas found to have levels of radioactivity that are over 300 dpm/100cm² such that they are below 300 dpm/100cm². Attach LSC printouts and repeats as needed to show negative contamination.
- Perform a surface scan survey with an appropriate instrument to supplement your wipe tests for all radionuclides except 3H. Decontaminate areas found to have activity above background using appropriate cleanup techniques. If decontamination efforts fail, notify RSO.
- Notify RSO that this lab is ready for verification of wipe testing and surface area surveying.
- Submit the Radiation Safety Logbook and any dosimetry (badges and rings – if in use) to the RSO.

(continued on opposite side)

Radioactive Material Laboratory Decommissioning Checklist

- Only after the RSO provides his "Radioactive Contamination Release Signature" is the lab considered decommissioned, and only then will all radioactive labeling, stickers, and the laboratory entrance sign be removed from the lab and/or equipment (equipment stickers and labeling stating a device was used with RAM will only be removed if equipment will no longer be used in a RAM lab; if transferring to another RAM lab, stickers may remain).

PH or PI by signing below, I verify that all of the above steps have been completed and all documentation showing that both the lab(s) and equipment involved in this decommissioning have been found free of radioactive contamination.

Patty Welan
Permit Holder

02 NOV 2021
Date

RSO by signing below: I have reviewed the documentation for this laboratory/area/equipment and believe the area and/or equipment to be free of radioactive contamination. The lab can now be returned to "general use" and is no longer considered a Radioactive Material Laboratory.

Paul Willis
RSO or designee

08 Nov 2021
Date

① Email release provided on 02 Nov 2021 - see attached BW 08 Nov 2021



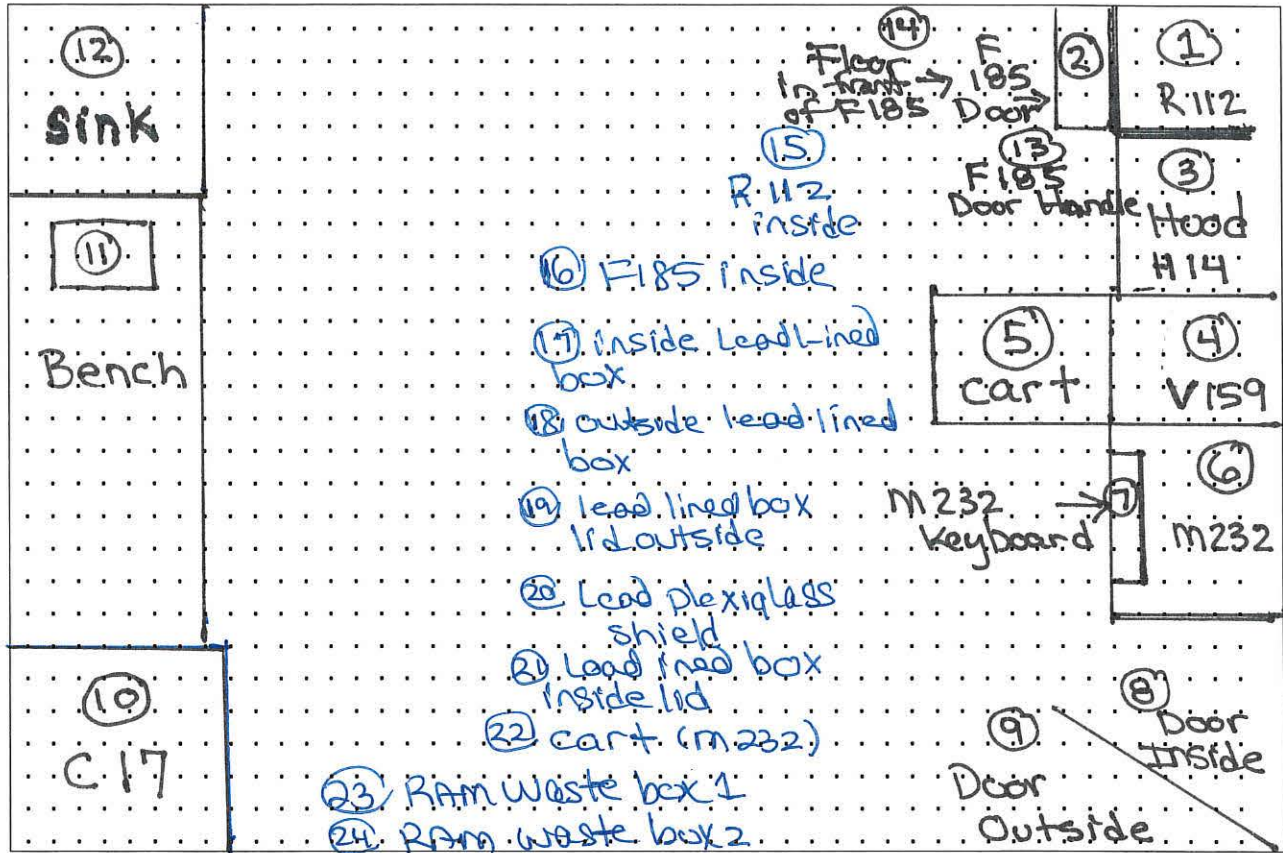
Radiation Survey Meter/Wipe Test Diagram

QPS, LLC Radiation Safety Program

PH: Patty Welch Surveyor/User: Patty Welch Date: 02 NOV 2021

Lab/Area: DTP1 / Lab 244 Jenna Whitmore

Note: This form is a template. Different labs will have differing configurations displayed on the map below. Numbers on the map indicate the sampling location (Wipe Site/Survey Meter).



Indicate Radioisotope: ¹⁴C ³H Other (write in): 125 I

Liquid Scintillation Counter ID: NA Survey Meter ID: M235

Check of performed: LSC printout attached Survey readings indicated on diagram

Results (select one):

Wipe Test Clear

Wipe Test Repeated (indicate site(s) and add footnote / attach LSC paperwork of which site(s) were repeated).

Evaluated by (Initials/Date): JW 02 NOV 2021 JW 11/2/21

Protocol ID	Protocol name	Measurement date & time	Completion status	Run ID	Rack	Det	Pos	Time	Wipe Test Tube #	125I-Cobra Counts	Cobra CPM	Cobra Error %	125I-Cobra Info	
1.	100	wipe Test	11/2/2021 09:47	0	2719	1	1	1	60.05	1	4.92	0	0	
2.	100	wipe Test	11/2/2021 09:47	0	2719	1	2	2	60.05	2	6.19	0	0	
3.	100	wipe Test	11/2/2021 09:47	0	2719	1	3	3	60.05	3	19	10.93	30.12	
4.	100	wipe Test	11/2/2021 09:47	0	2719	1	4	4	60.05	4	13	3.11	56.52	
5.	100	wipe Test	11/2/2021 09:47	0	2719	1	5	5	60.05	5	8.26	0	0	
6.	100	wipe Test	11/2/2021 09:48	0	2719	1	1	6	60.05	6	17.56	8.27	35.05	
7.	100	wipe Test	11/2/2021 09:48	0	2719	1	2	7	60.05	7	15	7.21	36.94	
8.	100	wipe Test	11/2/2021 09:48	0	2719	1	3	8	60.05	8	14	5.97	40.75	
9.	100	wipe Test	11/2/2021 09:48	0	2719	1	4	9	60.05	9	13	3.11	56.52	
10.	100	wipe Test	11/2/2021 09:48	0	2719	1	5	10	60.05	10	9	0	0	
11.	100	wipe Test	11/2/2021 09:50	0	2719	2	1	1	60.04	11	14	4.66	46.69	
12.	100	wipe Test	11/2/2021 09:50	0	2719	2	2	2	60.04	12	14	6.23	39.74	
13.	100	wipe Test	11/2/2021 09:50	0	2719	2	3	3	60.04	13	16	7.96	35.3	
14.	100	wipe Test	11/2/2021 09:50	0	2719	2	4	4	60.04	14	8.2	0	0	
15.	100	wipe Test	11/2/2021 09:50	0	2719	2	5	5	60.04	15	10	0	0	
16.	100	wipe Test	11/2/2021 09:52	0	2719	2	1	6	60.04	16	18.56	9.29	33.07	
17.	100	wipe Test	11/2/2021 09:52	0	2719	2	2	7	60.04	17	14	6.23	39.73	
18.	100	wipe Test	11/2/2021 09:52	0	2719	2	3	8	60.04	18	12	3.99	49.83	
19.	100	wipe Test	11/2/2021 09:52	0	2719	2	4	9	60.04	19	16.39	6.47	39.17	
20.	100	wipe Test	11/2/2021 09:52	0	2719	2	5	10	60.04	20	15	3.93	50.86	
21.	100	wipe Test	11/2/2021 09:53	0	2719	3	1	1	60.05	21	11	1.61	79.39	
22.	100	wipe Test	11/2/2021 09:53	0	2719	3	2	2	60.05	22	6	0	0	
23.	100	wipe Test	11/2/2021 09:53	0	2719	3	3	3	60.05	23	12	3.99	49.85	
24.	100	wipe Test	11/2/2021 09:53	0	2719	3	4	4	60.05	24	12	2.12	68.5	

① Numbers correspond with numbers on the attached Radiation Survey meter/wipe Test Diagram. JWZ 11/2/21

JWZ 11/2/21

PW 02 NOV 2021