



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION I
475 ALLENDALE ROAD – SUITE 102
KING OF PRUSSIA, PA 19406-1415

June 28, 2022

Edward Heaton, M.D., MPH
Executive Vice President for Health Sciences
Georgetown University
EH&S / Radiation Safety
LM-12 Preclinical Science Building
3900 Reservoir Road NW
Washington, DC 20057

SUBJECT: GEORGETOWN UNIVERSITY, REQUEST FOR ADDITIONAL INFORMATION,
MAIL CONTROL NO. 630716

Dear Dr. Heaton:

This is in reference to your letter dated March 21, 2022, requesting to renew NRC License No. 08-03114-05. In order to continue our review, we need the following additional information:

1. In accordance with 10 CFR 30.35(e)(2), a revised Decommissioning Funding Plan (DFP) is required to be submitted at the time of license renewal and at intervals not to exceed 3 years. A revised DFP was not submitted at the time of renewal (March 21, 2022) but we note that the most recent revision was submitted September 20, 2021, and accepted on April 28, 2022, and would not require a revised DFP if your limits had remained the same as in the most recent revision. However, that revision was submitted with the limit of 100 microcuries per radionuclide and 1 millicurie total for radionuclides with atomic numbers 84 through 98. Your renewal requested that limit to change to 400 microcuries per radionuclide and 1 millicurie total. Provide an evaluation of whether or not the increase per radionuclide for atomic numbers 84 through 98 affects your cost estimate for decommissioning. If so, a revised DFP also should be submitted.
2. Item 6 of the application states that the material listed in Item L is used for off-campus training of first responders. Your current license authorizes the use of Item A through L at temporary job sites. In addition, during the previous renewal in a letter dated February 8, 2012, you committed to using only sealed sources at temporary job sites; approval by the Radiation Safety Committee; and positive access controls. Please confirm
 - a. if you wish to continue to be authorized to use any material listed in Items A through L at temporary job sites in the form of sealed sources only, or if the request is only applicable to Item L;
 - b. that the Radiation Safety Committee will approve licensed activities at temporary job sites through its normal procedures; and
 - c. that you will implement security and control of licensed materials at all times at temporary job sites.

3. Sections 6, 9.1, and 11.4 address use of licensed materials in animals. However, it does not specify if live animals that have been administered licensed materials are released for unrestricted use. If so, provide your criteria for release for unrestricted use that demonstrates that animals released will meet the public dose limits. Guidance may be found in NUREG-1556, Volume 7, "Consolidated Guidance About Materials Licenses: Program-Specific Guidance About Academic, Research and Development, and Other Licenses of Limited Scope," Appendix D, "Guidance for Laboratory Animal and Veterinary Medicine Uses."
4. Section 10.7 "Survey procedures" states that facilities will be released for unrestricted use if they meet Table S.5 of NUREG-1556, volume 11, April 1999. Please note that this table is outdated for use for release for unrestricted use of buildings and soil and now may only be used for release of equipment. Confirm that you will meet the criteria in Table L-3 of NUREG-1556, Volume 11, Revision 1, February 2017, "Consolidated Guidance About Materials Licenses: Program-Specific Guidance About Licenses of Broad Scope." This table meets the requirements for release for unrestricted use specified in Subpart E of 10 CFR Part 20. Additional information may be found in NUREG 1757 "Consolidated Decommissioning Guidance."
5. In accordance with NUREG-1556, Volume 11, "Consolidated Guidance About Materials Licenses: Program-Specific Guidance About Licenses of Broad Scope," Revision 1, Section 8.10.7, "Surveys and Leak Tests," state that "We will implement the model leak test program published in Appendix M of NUREG-1556, Volume 11, "Consolidated Guidance About Materials Licenses: Program-Specific Guidance About Licenses of Broad Scope," Revision 1."
6. In accordance with NUREG-1556, Volume 11, "Consolidated Guidance About Materials Licenses: Program-Specific Guidance About Licenses of Broad Scope," Revision 1, Appendix H, "Radiation Monitoring Instrument Specifications and Model Radiation Survey Instrument and Air Sampler Calibration Program," confirm that calibration records will be maintained as described in Appendix H.

We will continue our review upon receipt of this information. Please respond with a pdf copy of a signed letter, which may be transmitted by electronic mail directly to

R1DRSSMail.Resource@nrc.gov

Reference – Betsy Ullrich

Mail Control No. 630716

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 "Agency 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.

If you have any questions regarding this request for additional information, please contact me at 240-704-4575 (cell) or by electronic mail to 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. 08-03114-05
Docket No. 030-13627
Mail Control No. 630716

cc: Donald I. Mullins, Radiation Safety Officer

GEORGETOWN UNIVERSITY, REQUEST FOR ADDITIONAL INFORMATION, MAIL
CONTROL NO. 630716 DATED JUNE 28, 2027

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SUNSI Review Complete: Betsy Ullrich

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