

From: [Betsy Ullrich](#)
To: kirby.john@epa.gov
Subject: request for additional information for your NRC license renewal
Date: Tuesday, December 20, 2022 5:24:00 PM
Attachments: [L01-07317-01.632213.RAI.pdf](#)

License No. 01-07317-01
Docket No. 030-03576
Mail Control No. 632213

Mr. Kirby,

This message contains a request for additional information for renewal of your NRC license. You will not be receiving a paper copy of this document in the regular mail. You should save a copy of this document, either in electronic format or paper, for your records. Please contact me by email or at 240-704-4575 if you have any questions about this letter.

Also, I attempted to call you to discuss the Am sources in the detectors, and left a voice mail. Not sure what happened there, perhaps I missed a return call. I am still getting used to not having an actual phone but working through the laptop.

Betsy

Betsy Ullrich, Senior Health Physicist
USNRC Region I
2100 Renaissance Boulevard, Suite 100
King of Prussia, PA 19406
610-337-5040 (office)
240-704-4575 (cell)
Elizabeth.ullrich@nrc.gov



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

November 10, 2022

John G. Griggs, Ph.D., Director
U. S. Environmental Protection Agency
National Analytical Radiation Environmental Laboratory
540 South Morris Avenue
Montgomery, AL 36115-2600

SUBJECT: U. S. ENVIRONMENTAL PROTECTION AGENCY NATIONAL ANALYTICAL RADIATION ENVIRONMENTAL LABORATORY, REQUEST FOR ADDITIONAL INFORMATION, MAIL CONTROL NO. 632213

Dear Dr. Kirby:

This is in reference to your application dated August 15, 2022, requesting to renew NRC License No. 01-07317-01. In order to continue our review, we need the following additional information:

1. The following items refer to your request in the letter dated August 15, 2022, and Items 3, 5 and 6 of the application for renewal.
 - a. The letter and Items 5 and 6 described the requested americium-241 (Am-241) sources as hermetically sealed inside the casing of a sodium iodide detector. Provide the manufacturer's name and model number for the detection system containing the Am-241 sources, so that we may determine if the sources and/or device are registered with the NRC or an Agreement State. In addition, it is possible that these sources are not required to be possessed under a specific license.
 - b. Item 3 of the application and your current license authorize the use and possession of licensed material at 540 South Morris Avenue, Montgomery, AL 36115-2601 and at temporary job sites of the licensee anywhere in the United States. Item 6 of the application stated that the new sources would be used at the 140 RadNet monitoring stations. Although we have reviewed the RadNet monitor locations on your website, provide a list of these locations with the specific addresses and contact information for each location, so that the locations could be inspected by the NRC. Confirm that a current list will be maintained for review during inspections.
2. Item 5 of the application requested 1 millicurie of californium-252 (Cf-252) although your current license authorizes only 1 microcurie. Confirm the amount to be authorized, and if applicable, provide the basis for the increase.

3. Item 10.5 of the application states that you will adopt the procedures for safe use of radionuclides and for emergencies as described in Appendix R of NUREG 1556, Volume 11, April 1999. Please note that Revision 1 of NUREG-1556, Volume 11 “Consolidated Guidance About Materials Licensees, Program-Specific Guidance About Licenses of Broad Scope” was issued in February 2017 and has a different appendix designation. In addition, a better reference for your license would be NUREG-1556, Volume 7, “Consolidated Guidance About Materials Licensees, Program-Specific Guidance About Academic, Research and Development, and Other Licenses of Limited Scope, Revision 1, February 2018 (NUREG-1556, Vol. 7, Rev. 1),” Appendix L “General Topics for Safe Use of Radionuclides and Model Emergency Procedures” which may be found at <https://www.nrc.gov/reading-rm/doc-collections/nuregs/staff/sr1556/v7/index.html>. In accordance with Section 8.10.6 of NUREG-1556, Vol. 7, Rev. 1, confirm that you will develop procedures using Appendix L of NUREG-1556, Vol. 7, Rev. 1.
4. Item 10.6 of the application states that the radiation safety officer (RSO) perform quarterly surveys. Based on the guidance in NUREG-1556, Vol. 7, Rev. 1, Appendix M, “Radiations Safety Survey Topics,” quarterly surveys may not be sufficient for some of your licensed materials. In accordance with NUREG-1556, Vol. 7, Rev. 1, Section 8.10.7, “Surveys and Leak Tests,” state “We will survey our facility and maintain contamination levels in accordance with the survey frequency and contamination levels published in Appendix M of NUREG-1757, Vol. 7, Rev. 1.”
5. The application includes a floorplan “Figure 9.1.” Most of the text and numbers on this diagram are illegible. Please provide a legible copy of the floorplan showing use and storage areas.

I will continue our review upon receipt of this information. Please reply to my attention at: 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 "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 610-337-5040 or via electronic mail at Betsy.Ullrich@nrc.gov.

Thank you for your cooperation.

Sincerely,

**Elizabeth
Ullrich**

Digitally signed by
Elizabeth Ullrich
Date: 2022.12.20
17:17:14 -05'00'

Betsy Ullrich, Senior Health Physicist
Commercial, Industrial, R&D
and Academic Branch
Division of Radiological Safety and Security
Region I

License No. 01-07317-01
Docket No. 030-3576
Mail Control No. 632213

cc: John K Kirby, Radiation Safety Officer

U. S. ENVIRONMENTAL PROTECTION AGENCY NATIONAL ANALYTICAL RADIATION ENVIRONMENTAL LABORATORY, REQUEST FOR ADDITIONAL INFORMATION, MAIL CONTROL NO. 632213 DATED DECEMBER 20, 2022

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SUNSI Review Complete: Betsy Ullrich

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| OFFICE | RI:DRSS | N | RI:DRSS | N | | | | |
| NAME | LForney | | Betsy Ullrich | | | | | |
| DATE | 11/10/222 | | 12/20/22 | | | | | |

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