

From: [Frank Tran](#)
To: tyler.a.werke.civ@army.mil
Subject: Request for additional information for NRC Materials License No. 12-00722-15
Date: Friday, May 12, 2023 7:20:00 PM

Dear Dr. Werke:

This refers to the renewal license application for U.S. Army Joint Munitions Command, NRC License No. 12-00722-15. We reviewed the application in accordance with the licensing guidance in NUREG-1556, Volume 18, Revision 1. An electronic copy of the guidance can be downloaded from the NRC's website at <https://www.nrc.gov/reading-rm/doc-collections/nuregs/staff/sr1556/v18/index.html>. Based on the review, we will need the following.

1. The licensee stated that sealed sources or components contained radioactive material will be removed from instrument or articles and transferred to a licensed facility for recycle, processing, or disposal. Please confirm the licensee will not perform those activities (recycle, process, or dispose radioactive materials) under this license.
2. The licensee requests the possession of byproduct, source, and special nuclear materials; however, Section 5.b addressed the decommissioning record for byproduct material only. Based on the licensing guidance, provide the following: "Pursuant to 10 CFR 30.35(g), 10 CFR 40.36(f), and 10 CFR 70.25(g), and 10 CFR 70.51(b)(3), as appropriate, we will maintain drawings and records important to decommissioning and will transfer these records to an NRC or Agreement State licensee before licensed activities are transferred. Furthermore, pursuant to 10 CFR 30.51(f), 10 CFR 40.61(f), and 10 CFR 70.51(a), as appropriate, prior to license termination, we will forward the records required by 10 CFR 30.35(g), 10 CFR 40.36(f), and 10 CFR 70.25(g), as appropriate, to the appropriate NRC regional office or to assign the records to the appropriate NRC regional office before the license is terminated."
3. Please note that many tasks and duties associated with managing the radiation safety program may be assigned or delegated to other qualified individuals to perform on behalf of the Radiation Safety Officer (RSO). The NRC recognizes that a qualified individual will on occasion fill in for the RSO when the RSO is away for short periods of time (e.g., professional conferences, vacation, illness). Absences that have a major impact on licensed activities should not occur for extended or indefinite periods of time. Consideration should be given to how individuals temporarily delegated the duties and tasks of the absent RSO could contact the RSO in the event of an emergency. Please confirm that RSO's tasks and duties may be assigned or delegated to other qualified individuals to perform; however, the responsibility for these tasks and duties remains with the RSO.
4. Provide a copy of the duties and responsibility of the RSO and a confirmation that the RSO will be available for emergencies and can be on-site within 24-48 hours, if applicable.

5. Provide a confirmation that authorized user will be approved by the RSO in writing before performing licensed activities and record of training and approval will be maintained for 3 years following the last use of licensed material by the individual.
6. If there will be explosive, flammable, or other hazardous materials stored in the areas where licensed materials are stored or used, please indicate them in the facility diagram and resubmit.
7. Provide a description of the ventilation systems with pertinent airflow rates (minimum flowrate), filtration equipment, sample collection points, and monitoring system, if applicable. Provide a statement that the ventilation system will be operated and maintained in accordance with the manufacturer/vendor instructions or industrial standards. In addition, provide a copy of the evaluation of air effluent release to ensure the licensee is in compliance with the requirements in 10 CFR 20.1101(d).
8. Provide a confirmation that the licensee will decontaminate contaminated items to background radiation levels before releasing to unrestricted areas and when it is not possible to get to background levels, the licensee must ensure that the amounts do not exceed the contamination levels listed in Table 10.7.1 of the application.
9. The licensee has implemented the air monitoring program and now requests to make a change to the alarm setpoint to reduce the false alarms on the tritium air monitoring instrument. Please confirm that the licensee will implement the air monitoring program following the Regulatory Guide 8.25, Revision 1, "Air Sampling in the Workplace".
10. Please confirm that radiation survey instruments will be calibrated by a licensee who is authorized by the NRC or Agreement State to perform such services.
11. Section 10.4 of your application stated that dosimetry will be exchanged at a frequency specified in Section 8.10.4 of NUREG-1556, Volume 18. This is incorrect. Please provide a statement that the NVLAP accredited dosimetry will be exchanged at a frequency specified in Section 8.10.6, "Occupational Dose", of NUREG-1556, Volume 18, Revision 1.
12. Provide the following statement: "We will develop, implement, and maintain procedures for ensuring accountability of licensed materials at all times."
13. Please confirm that the licensee will not dispose radioactive wastes by incineration, decay-in-storage, or into sanitary sewerage. In addition, please confirm that your licensed activities (volume reduction) will not impact the physical integrity of the sealed sources, foils, or plated sources which contain radioactive materials.

To continue the review of your application, we request that you submit your response under a dated and signed cover letter by June 9, 2023. In the cover letter, please refer the license

number, docket number and Mail Control No. 634123. We will assume that you do not wish to further pursue this licensing action if we do not receive a reply within the specified timeframe noted above.

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 Title 10 of the *Code of Federal Regulations* (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>.

Best regards,

Frank Tran

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