

From: [Donnelly, Patrick](#)
To: [Jennifer Tobin](#)
Subject: [External_Sender] FW: Rad Materials License
Date: Tuesday, February 28, 2023 1:32:34 PM
Attachments: [image001.png](#)
[L426A23.pdf](#)

Jenny-

The lab we've been sending samples with di minimis amounts of SNM had their license changed (attached) as a result of the exchange below:

Summary of question from Department to NRC Liaison:

There is a NRC licensee (Westinghouse Fuel) that plans on sending free release effluent liquid samples (below effluent release limits) to a laboratory that has a specific South Carolina radioactive material license. It is my understanding that these samples may have small amounts of special nuclear material (U-235) in quantities not sufficient to form a critical mass (< 350 grams for U-235). I reviewed our regulations and NUREG-1556, Volume 17, Revision 1, and had the following question(s): Would the transfer of this material be exempt under 10 CFR 150.10 and/or can an Agreement State license be authorized to possess this type of material?

Summary of response from NRC Liaison to Department:

"SNM is governed under Part 70. Unlike source material, there are no regulations for possession or transfer of small quantities of SNM without a specific license. Thus, the material has to be possessed under a specific license at all times (general licenses apply to certain calibration and reference sources and transportation of SNM). The laboratory that receives the material must have the SNM listed on their State license. As you noted, Part 150 allows possession of small quantities of SNM under an Agreement State license (using the formula provided in 150.11). I don't know of any specific prohibition for transfer of small quantities of SNM from an NRC licensee to a State licensee as described below. But, the State licensee must be licensed to possess the SNM material."

From: Joyner, C Diana <joynerdp@westinghouse.com>
Sent: Tuesday, February 28, 2023 12:45 PM
To: Parr, Nancy B. <parrnb@westinghouse.com>; Donnelly, Patrick <donnellpb@westinghouse.com>; Wagoner, David <wagoneda@westinghouse.com>; Subosits, Stephen G <Stephen.Subosits@westinghouse.com>; Miller, Anna V <millerav@westinghouse.com>
Subject: FW: Rad Materials License

FYI

From: Kristina Bouknight <Kristina.Bouknight@pacelabs.com>
Sent: Tuesday, February 28, 2023 12:14 PM
To: Joyner, C Diana <joynerdp@westinghouse.com>
Cc: Cathy Dover <Cathy.Dover@pacelabs.com>; Erin Boyd <Erin.Boyd@pacelabs.com>
Subject: RE: Rad Materials License

[External Email]

Hi Diana,

Please find the attached license. I had a quick meeting with upper management this morning after my call with David this morning.

On the next big sampling event, can you provide a sampling plan? [Test methods / Number of samples per method / duration of sampling event].

Thanks,

Kristy

Kristy Bouknight

Quality Analyst / Environmental Health and Safety Officer / Waste Coordinator
106 Vantage Point Drive, West Columbia, SC 29172
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From: Joyner, C Diana <joynerdp@westinghouse.com>
Sent: Tuesday, February 28, 2023 12:07 PM
To: Kristina Bouknight <Kristina.Bouknight@pacelabs.com>
Cc: Cathy Dover <Cathy.Dover@pacelabs.com>
Subject: Rad Materials License

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Kristy-

Good afternoon! Could you please send me a copy of your new rad license?
I heard this morning that you had a new exclusion in the license for enriched uranium.

I spoke with Cathy yesterday and we offered to provide a template to you to use for the license amendment if you would like. We are trying to get that to you today via email.

Thanks,
Diana

Diana P. Joyner

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