



**State of Connecticut Department of Energy and Environmental Protection
Radioactive Materials Program**

RCP-900.5

Renewal Notices, Receipt and Tracking of Licensing Actions

Prepared By: _____ **Date:** _____

Reviewed By: _____ **Date:** _____

Approved By: _____ **Date:** _____

Revision	Date	Description of Changes

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1.0 PURPOSE

1.1 Applicability

- 1.1.1 This procedure applies to all records related to license applications, renewals, amendments, and terminations including renewal notices, receipt of licensing actions, acknowledgement letters, and tracking of licensing actions.
- 1.1.2 Licensing actions shall be tracked from their receipt until a licensing action is completed or a determination is made to deny the request.

2.0 SCOPE

- 2.1 This document applies to the Radioactive Materials Program (RMP) under Connecticut's Agreement State with the Nuclear Regulatory Commission (NRC)

3.0 REFERENCES

- 3.1 Sections 22a-153-1 through 22a-153-150, inclusive of the Regulations of Connecticut State Agencies and Chapter 446a of the Connecticut General Statutes.
- 3.2 CTDEEP Form 313 - filed in Connecticut license file.
- 3.3 Deficiency Letter - filed in Connecticut license file.
- 3.4 License - filed in Connecticut license file.

4.0 DEFINITIONS & ABBREVIATIONS

- 4.1 Department: The Connecticut Department of Energy and Environmental Protection (CT-DEEP)
- 4.2 Request for Additional Information (RAI): A communication with the applicant that documents a request for additional information needed to process the licensing request. Problems with the submission, the rule or regulatory guidance that is applicable, and the specific action requested of the licensee or applicant must be clearly stated.
- 4.3 License Reviewer: Any Radiation Division personnel qualified to review, process, and document a specific category of licensing action. A license reviewer shall not perform a secondary review for any category of license for which they are not qualified.
- 4.4 Licensing Action: A request or application received from an applicant or a licensee as follows:

- 4.4.1 An application for a license to receive, possess, store, and use licensed radioactive materials;
 - 4.4.2 An application for renewal of a license;
 - 4.4.3 An amendment request to a license, e.g., change in administration, authorized use and/or user(s), RSO, quantity of material, add isotopes, facilities, etc.; and/or,
 - 4.4.4 A request for termination of a license.
- 4.5 Processing: Reviewing the application for license or amendment, requesting additional information if appropriate, and either issuing or denying, with or without prejudice, the requested license or amendment.

5.0 GENERAL

5.1 EQUIPMENT

- 5.1.1 None

5.2 PRECAUTIONS AND LIMITATIONS

- 5.2.1 None

5.3 RESPONSIBILITIES

5.3.1 Radiation Division Staff

5.3.1.1 Responds to requests for license applications and uses the schedule in RCP-900.1, *Review of Initial Application for License or an Amendment Request*, for prioritization of license reviews.

5.3.1.2 Receives, logs, and acknowledges the receipt of an application, including application fee, for a new license in the licensee/applicant file.

5.3.1.3 Prepares the renewal letter to notify the licensee that the license will expire in 90 days.

5.3.1.4 Records dates as provided for receipt and tracking of all licensing actions, including transmittal of timely filed letters for renewals.

5.3.1.5 Sends out acknowledgement letters for receipt of termination requests in a timely fashion (if possible, within 15 working days).

5.3.1.6 Assigns due date (90 or 180 days) for each licensing action based on type of action (see RCP-900.1) and enters this information into Web-Based Licensing (WBL) in consultation with the Supervising Radiation Control Physicist (SRCP) as needed.

5.3.1.7 Prepares a list for the SRCP that shows the status of each licensing action.

5.3.1.8 Performs secondary review of licenses prepared by other Department licensing staff members.

5.4 Supervising Radiation Control Physicist (SRCP)

5.4.1 Responds to requests for license applications and uses RCP-900.1 for prioritization of license reviews.

5.4.2 Conducts license reviews or secondary reviews as assigned by the Radiation Division Director (RDD).

5.4.3 Conducts completeness review for renewals and signs deemed timely filed letter for renewals as assigned by the RDD.

5.5 Radiation Division Director

5.5.1 Provides guidance to SRCP on prioritizing and reviewing licensing actions.

5.5.2 Assigns licensing actions and completeness reviews to approved Radiation Division personnel for secondary review of license applications.

5.6 PREREQUISITES

None.

5.7 RECORDS

5.7.1 Records to be Maintained

5.7.1.1 License Application (CTDEEP Form 313) - filed in Connecticut license file.

5.7.1.2 Request for Additional Information - filed in Connecticut license file.

5.7.1.3 License - filed in Connecticut license file.

5.8 Records Retention

5.8.1.1.1 Records are filed electronically using Web-based Licensing (WBL).

5.8.1.1.2 Records may also be kept in other secure electronic forms with access only to Radiation Division personnel.

5.9 ATTACHMENTS

None

6.0 PROCEDURE

6.1 Receipt of Licensing Action

6.1.1 Upon receipt of a licensing action, the primary reviewer will determine the type of licensing action (i.e., new application, renewal, amendment request, or termination request) and based on the prioritization schedule in RCP-900.1, identifies a priority and due date. The SRCP will provide additional guidance in prioritization as needed.

6.1.2 If the application is for a renewal or new application or significant amendment, a more detailed review is required.

6.1.3 All primary (and secondary) reviews are documented using RCP-900.1, Attachment 4, **License Review Job Aid**.

6.1.4 Acknowledgement letters shall be sent for new applications and termination requests.

6.1.5 A fee must accompany the initial application.

NOTE:

Pursuant to Section 22a-6j any person who files an untimely application for renewal of a license shall be billed, in addition to the application fee, the following for an untimely submittal:

Days after last date allowed for filing.	Additional Fee.
Between 14 days and 30 days.	10 % of Application Fee.
Between 31 days and 60 days.	20% of Application Fee.
Between 61 days and 90 days.	40 % of Application Fee.
Between 91 and 120 days.	50 % of Application Fee.
Greater than 120 days.	65 % of Application Fee.

6.2 Assignment of License Reviewer

6.2.1 The SRCP or designee will assign licensing actions to qualified license reviewers based on workloads, experience levels, and the priority assigned to the licensing action.

6.3 Secondary Review

6.3.1 A secondary review must be performed for all licensing actions to identify any deficiencies in the license application, renewal, amendment, or termination documentation before the licensing review can proceed to supervisory review and RDD approval.

6.3.2 A secondary review using the guidance in RCP-900.1, Attachment 4, **License Review Job Aid** is to verify the licensee used appropriate regulatory guidance and forms to complete the application.

6.3.3 A secondary review determines if additional information is required (e.g., emergency response procedures, attestation, training and experience, leak test results, etc.), and if the application was signed by a duly authorized representative of the company or institution.

6.3.4 Timely filed letters shall be sent for renewal applications that are deemed to be complete.

6.4 Requests for Additional Information

- 6.4.1 The qualified reviewers shall review the licensing action request and determine if additional information is needed.
- 6.4.2 Requests for additional information will be handled with a letter or a documented telephone call to the licensee or applicant that indicates a due date for submittal of the information within 30 days or less.
- 6.4.3 A due date for the additional information shall be entered into WBL.

Note: If the information needed is not extensive, the request may be communicated by telephone or email and the licensee or applicant may submit via fax as long as the fax is signed. The license reviewer will need to document the telephone call in the license file.

6.5 Receipt of Additional Information or Missed Deadline

- 6.5.1 Once the requested information is received, the receipt of the information shall be logged into WBL.
- 6.5.2 On a weekly basis, each qualified reviewer shall be responsible for checking their pending licensing actions to determine the current status.
- 6.5.3 In the event that a deadline is missed by a licensee or applicant, the license reviewer shall, in a timely fashion (if possible, within 5 working days), follow up with the licensee or applicant to determine the status of the requested information.
- 6.5.4 If no response is received within 60 days, the licensing request may be considered abandoned and any relevant information documented in WBL.
- 6.5.5 The license reviewer will prepare an abandonment letter for signature of the RCPD and send it to the licensee notifying them of the action taken.

6.6 Writing the License, Secondary Review, and Documentation

- 6.6.1 Writing the License: The qualified license reviewer shall write the license action using the standard license conditions and license template to develop or modify the license. The initial Department issued license will not have an Amendment Number.
- 6.6.2 Secondary Review: The primary reviewer shall forward the licensing action file with the draft license to the SRCP to assign or make a secondary review. The secondary reviewer will discuss any issues of concern with the initial license reviewer and make the necessary corrections.

- 6.6.3 Supervisory Review: Before a licensing action is signed and approved by the RDD, the RDD must make a supervisory review as documented on RCP-900.1, Attachment 5, **Administrative Qualitative Checklist**.
- 6.6.4 Documentation: When all issues are satisfactorily resolved, the secondary reviewer documents agreement with the proposed licensing action.

6.7 Signing the License and File Documentation

- 6.7.1 Signing Approval of the Licensing Action: The license can be signed by the RDD or by an individual designated by the RDD after the secondary review and the supervisory review.
- 6.7.2 File Documentation: The licensing action is assigned to a qualified license reviewer for logging the completion of the licensing activity, inserting the licensing request, any deficiency letters, response(s), transmittal letter, and licensing actions into WBL.