

From: [Jason Kelly](#)
To: jablonowski.eugene@epa.gov
Subject: U.S. NRC Materials License #16-35119-01 - Request for Additional Information
Date: Tuesday, June 25, 2024 6:59:00 PM

Mr. Jablonowski:

I have reviewed the response letter dated June 13, 2024, in support of the request for the renewal of U.S. Nuclear Regulatory Commission (NRC) Materials License No. 16-35119-01.

Upon review of the response, I noted that the requested Emergency Procedure, was not attached per my request letter May 16, 2024, which was made in accordance with Section 8.10.1 of NUREG-1556, Volume 18, Rev. 1, "Consolidated Guidance About Materials Licenses: Program-Specific Guidance About Service Provider Licenses." Please understand that the requested Emergency Procedure are not synonymous with and should not be confused with the Emergency Plan referenced in Title 10 of the *Code of Federal Regulations* (10 CFR) §30.32(i).

You are correct in noting that the activity of your licensed sources is well below the threshold for which consideration for submission of an Emergency Plan is warranted. Though, you should have an Emergency Procedure available that is commensurate with the hazard associated with the licensed sources. For example, your Emergency Procedure should include instructions for responding to incidents involving the loss or suspected theft of radioactive materials. An acceptable Emergency Procedure may include instruction to your staff to perform a complete search of the area where the sources were last known to be located using an appropriately sensitive radiation detection instrument and to report the loss or suspected theft to the Radiation Safety Officer. Other possible items that you may consider including in your Emergency Procedure are identified in Section 8.10.1 of the above-mentioned guidance. Please submit your Emergency Procedure.

Please submit your response, including a signed cover letter, within 15 days of this request. As you will not receive a hardcopy of this request for additional information, please confirm that you have received this email.

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