



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

August 1, 2024

LTG Telita Crosland, Director
Defense Health Agency
7700 Arlington Boulevard
Suite # 5101
Falls Church, VA 22042-5101

**SUBJECT: DEFENSE HEALTH AGENCY, REQUEST FOR ADDITIONAL INFORMATION,
MAIL CONTROL NO. 641410**

Dear LTG Crosland:

This is in reference to your letter dated June 13, 2024, requesting to amend NRC License No. 45-35423-01. In order to continue our review, we need the following additional information:

1. For LCDR Kent J. Wong please confirm that the reference to 10 CFR 35.600 in table 5b of the submitted 313A (RSO) form is for HDR. Additionally, you have referenced 200 hours in Table 5a for the structured educational program for classroom and training; however, the timeframe listed is only 4 weeks which is typically 160 hours. Please revise the submission or explain how you were able to accomplish 200 hours in four weeks, such as submitting the syllabus for the training provided during that four-week period.
2. For Brandon Nuzzolese please confirm that the reference to 10 CFR 35.1000 in Table 5b of the 313A (RSO) form is for Y-90 microspheres.
3. For Steffany Molina Rivera, you have referenced 206 hours of training for the period 4/29-5/27/2022 which exceeds the expected 160 hours typically attributed to a four-week period. However, since you have referenced 572 total hours of training which greatly exceeds the required 200, this concern is moot. Please confirm that the reference to 10 CFR 35.600 in Table 5b of the submitted 313A(RSO) is for HDR.
4. For 1LT Steven M. Davis, you have referenced 200 hours of training for the period 4/29-5/27/2022 which exceeds the expected 160 hours typically attributed to a four-week period. However, you have referenced 414 total hours of training which greatly exceeds the required 200 so this concern is moot. Please confirm that the reference to 10 CFR 35.600 in Table 5b of the submitted 313A(RSO) is for HDR. Additionally, for Table 5c of the submitted 313A (RSO) form, confirm that the 10 CFR 35.1000 use referenced is for Y-90 microspheres.
5. Your request to change Item 6 AO to Z 84-100 does not match the authorization on the NRC license 19-09880-01 license that was incorporated into your license and for which

you provided FA. That license was authorized for Z 84-103 as is currently reflected in Amendment 11 and will carry over to Amendment 12. Please confirm that you wish to alter the authorizations previously held by the facilities previously licensed under USNRC license no. 19-09880-01.

6. Relative to the transfer of WRAIR USNRC License Number 19-35377-01 to the DHA license, please confirm that you agree to all the conditions communicated in the letter dated May 10, 2024, to the Region 1 office requesting the transfer, signed by COL Eli Lozano.
7. Relative to the transfer of USAMRIID, USNRC License No. 19-11831-03, to the DHA license, please confirm that you agree to all the conditions communicated in the letter dated May 9, 2024, to the Region 1 office requesting the transfer, signed by COL Aaron Pitney.
8. The addition of USNRC License Number 19-11831-03, U.S. Army Medical Research Institute of Infectious Diseases, requires financial assurance in the amount of \$1,238,000. A new Financial Assurance licensing action will be created for this revision and the control number will be communicated at a later date. Please submit your revised Financial Assurance under that control number. You may reference NUREG 1757, Volume 3 Revision 1 Consolidated NMSS Decommissioning Guidance – Financial Assurance, recordkeeping, and Timeliness <https://www.nrc.gov/reading-rm/doc-collections/nuregs/staff/sr1757/v3/index.html> to determine options for submitting the Financial Assurance (FA).
 - a. Revise your current Certificate of Financial Assurance to address the addition of this new facility under the Defense Health Agency license.
 - b. Revise your current Statement of Intent to incorporate the additional funds as referenced above.
9. Confirm that DHA will abide by all commitments previous established for U.S. NRC Licenses 19-11831-03, and 19-35377-01 and that there have been no changes to the authorized uses, facilities, equipment, and locations currently authorized on these licenses.
10. As previously discussed for past amendments adding new facilities, in order to combine these licenses into your current license, we plan to add the currently licensed materials as they appear on the existing licenses and limit their use to the locations previously authorized. Additionally, the tie downs on the existing licenses will be added to your license and restricted to the applicable locations. If you disagree with this approach, provide the materials as you request them to be appear on this license; however, understand that changes to these listings may affect the Financial Assurance currently approved for the two licenses to be added at this time.

Your reply must be an originally signed and dated letter. The letter may be scanned and submitted as a pdf document attached to an email. If you have any questions regarding this, please feel free to contact me. If we do not receive a reply from you within 30 calendar days from the date of this e-mail, we will assume that you do not wish to pursue your amendment request. We understand that your response to update the Financial Assurance may take additional time so please indicate when you will expect to provide the revised document in your response.

An electronic version of the NRC's regulations is available on the NRC Web Site at: www.nrc.gov. Additional information regarding medical uses of radioactive materials may be obtained on the NRC Web Site at: <http://www.nrc.gov/materials/miau/med-use-toolkit.html>. This site also provides the updated Training and Experience NRC Form 313A series of forms and guidance, as well as information on the revised regulations for naturally-occurring and accelerator-produced radioactive materials (NARM).

NRC's Regulatory Issue Summary (RIS) 2005-31 provides criteria to identify security-related sensitive information and guidance for handling and marking of such documents. This ensures that potentially sensitive information is not made publicly available through ADAMS, the NRC's electronic document system. Pursuant to NRC's RIS 2005-31, and in accordance with 10 CFR 2.390, this letter is exempt from public disclosure because its disclosure to unauthorized individuals could present a security vulnerability. The RIS may be located on the NRC Web Site at: <http://www.nrc.gov/reading-rm/doc-collections/gen-comm/reg-issues/2005/ri200531.pdf> and the link for frequently asked questions regarding protection of security-related sensitive information may be located at: <http://www.nrc.gov/reading-rm/sensitive-info/faq.html>.

If you have any questions regarding this request for additional information, please contact me at (610) 337-5076 or via electronic mail at Robin.Elliott@nrc.gov.

Thank you for your cooperation.

Sincerely,

Robin L. Elliott, Senior Health Physicist
Medical and Licensing Assistance Branch
Division of Radiological Safety and Security
Region I

License No. 45-35423-01
Docket No. 030-39046
Mail Control No. 641410

cc: COL Ricardo Reyes, Ph.D.,
Radiation Safety Officer

DEFENSE HEALTH AGENCY, REQUEST FOR ADDITIONAL INFORMATION, MAIL CONTROL NO. 641410 DATED AUGUST 1, 2024

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SUNSI Review Complete: RElliott

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NAME	RElliott (RLE)						
DATE	8/1/2024						

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