

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

September 6, 2024

Captain Gerald F. Burke, Director Uniformed Services University of the Health Sciences Armed Forces Radiobiology Research Institute 8901 Wisconsin Avenue, Building 42 Bethesda, Maryland 20889-5648

SUBJECT: UNIFORMED SERVICES UNIVERSITY OF THE HEALTH SCIENCES, REQUEST FOR ADDITIONAL INFORMATION, MAIL CONTROL NO. 640546

Dear Captain Burke:

This is in reference to your application dated April 26, 2024, requesting to renew NRC License No. 19-08330-03. In order to continue our review, we need the following additional information:

- Item 10.1.2: Emergency and/or Abnormal Event Procedures You submitted in item 10.1.2 of your application indications that emergency procedures have been developed for the following scenarios: a. Co-60 sources stuck in the unshielded position; b. Personnel overexposures; c. Detection of leaking sources, pool decontamination, or alarm caused by contamination of pool water; d. A low water indictor, an abnormal water loss, or leakage from the source storage pool; e. A prolonged loss of electrical power; f. A fire alarm or explosion in the exposure room; and g. Pertinent natural phenomena. However, you did not submit these procedures or a summary of these procedures. Provide emergency procedures or summaries, including a description of the radiation safety aspects of those items listed.
- 2. Item 10.3: Detection of Leaking Sources & Item 10.9: Reports You submitted the use of Tables 2 & 3 of NRC Regulatory Guide 8.23 Radiation Safety Surveys at Medical Institutions. As of August 7, 2018, this Regulatory Guide has been withdrawn and cannot be used in whole in this licensing action. If you wish to use strictly the tables, you are allowed to do that as they are more restrictive but would need to be submitted in whole and separate from Regulatory Guide 8.23. Alternatively, Appendix L of NUREG-1556, Volume 11, "Consolidated Guidance About Materials Licenses: Program-Specific Guidance About Licenses of Broad Scope" provides these tables in part. Please provide alternative contamination release levels that do not directly reference in whole Regulatory Guide 8.23.
- 3. Decommissioning Funding Plan In your application you submitted a Decommissioning Funding Plan (DFP) with a Statement of Intent for the access to funds totaling \$721,495. Your previous Financial Assurance instrument (i.e., Statement of Intent) that was approved on August 8, 2020, only totaled \$113,000 as per the certification requirements detailed in 10 CFR 30.35(d). If it is your intention to maintain the DFP you submitted with your application, please indicate that in your response. If you wish to maintain your current Financial Assurance instrument, please resubmit a Statement of Intent detailing the access of funds totaling \$113,000 since the signatory of the document has changed.

We will continue our review upon receipt of this information. Please reply to my attention at:

Steven Courtemanche, Health Physicist Mail Control No. 640546 USNRC, Region I Division of Radiological Safety and Security 475 Allendale Road – Suite 102 King of Prussia, PA 19406

Or

<u>R1DRSSMail.Resource@nrc.gov</u> Reference – Steven Courtemanche, Health Physicist Mail Control No. 640546

In order to continue prompt review of your application, we request that you submit your response to this letter within 30 calendar days from the date of this letter.

An electronic version of the NRC's regulations is available on the NRC Web Site at: <u>www.nrc.gov</u>. Additional information regarding use of radioactive materials may be obtained on the NRC Web Site at: <u>http://www.nrc.gov/materials/miau/mat-toolkits.html</u>. This site also provides the link to the toolbox for updated information on the revised regulations for naturally-occurring and accelerator-produced radioactive materials (NARM).

In accordance with 10 CFR 2.390 of the NRC's "Agency Rules of Practice and Procedure," a copy of this letter will be available electronically for public inspection in the NRC Public Document Room or from the NRC's document system (ADAMS). ADAMS is accessible from the NRC Web Site at: http://www.nrc.gov/reading-rm/adams.html. Please be aware that you may request that certain portions of your submittal to NRC be withheld form public disclosure as proprietary information. To do this, you must execute an affidavit as specified in 10 CFR 2.390. You must list all portions that you wish to be held proprietary, along with your reasoning as to why that is appropriate. While it is allowable, please refrain from submitting proprietary information in support of a license unless necessary. Keep in mind that all NRC licenses are considered to be in the public domain, and therefore may be viewed by any member of the public who requests to see them.

If you have any questions regarding this request for additional information, please contact me at (610) 337-5075 or via electronic mail at <u>Steven.Courtemanche@nrc.gov</u>.

Thank you for your cooperation.

Sincerely,

Steven Courtemanche, Health Physicist Commercial, Industrial, R&D and Academic Branch Division of Radiological Safety and Security Region I

License No. 19-08330-03 Docket No. 030-06931 Mail Control No. 640546

cc: Major Jacob G. Vincent, Radiation Safety Officer

UNIFORMED SERVICES UNIVERSITY OF THE HEALTH SCIENCES, REQUEST FOR ADDITIONAL INFORMATION, MAIL CONTROL NO. 640546 DATED SEPTEMBER 6, 2024

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