UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION III
2056 WESTINGS AVENUE, SUITE 400
NAPERVILLE, IL 60563-2657

January 13, 2025

W. Clark Evers, CHP, CSP, PMP
Radiation Safety Officer
Leidos, Inc.
13397 Lakefront Dr., Ste. 100
Earth City, MO 63045t

Dear Mr. Evers:

This letter is regarding your request dated December 10, 2025, to amend your U.S. Nuclear Regulatory Commission (NRC) Materials License No. 24-32591-01.

The NRC's guidance document for your type of license, which I refer to below as "the guidance," is NUREG-1556, Volume 18, Rev. 1, dated August 2017, "Consolidated Guidance About Materials Licenses: Program-Specific Guidance About Service Provider Licenses." This guidance is available on the NRC website at:
https://www.nrc.gov/docs/ML1724/ML17242A055.pdf

Upon review of the request, I identified the following areas requiring additional or clarifying information:

1. Section 8.3, "Address(es) where Licensed Material will be Used or Possessed," of the guidance and Item 3 of the NRC Form 313, "Application for Materials License," require that you specify the address(es) where licensed materials will be used or possessed.

   Your application requests authorization to add an additional permanent location at 13505 Lakefront Drive, Earth City, Missouri.

   Your request also refers to two additional locations at 112 James S. McDonnell Blvd., Hazelwood, Missouri, and 2 Angelrodt St., St. Louis, Missouri. Though, these locations are not identified as permanent locations in Condition 10.A. of your license.

   Please clarify if these referenced locations are temporary job sites or if these locations should be added to the license as permanent locations.

2. Section 8.9, "Facilities and Equipment," of the guidance describes that the proposed facilities and equipment must provide adequate storage capabilities, appropriate shielding, maintain radiation exposures ALARA, and minimize the possibility of contamination or release of licensed materials, as a result of normal and emergency conditions, including fire, floods, earthquakes, and wind damage.

   Licensed materials located in an unrestricted area and not in storage must be under the constant surveillance and immediate control of the licensee. Licensed materials should be accessible only by authorized persons and secured or locked when an authorized person is not physically present. If accessible by unescorted, unauthorized persons, use or storage areas cannot be considered restricted areas for purposes of radiation safety.

   Your request included a facility diagram and description of your proposed facilities but did not include all detail needed.

Therefore, please resubmit the facility diagram and equipment description including a drawing or sketch of the proposed permanent location that includes all of the following, as applicable:

- Identify area(s) assigned for the receipt, storage, security, preparation, handling, waste storage, and measurement of radioactive materials, including sealed sources and devices.
- Show the relationship and distance between restricted areas and adjacent unrestricted areas.
- Indicate the scale, or include dimensions on each drawing or sketch. The same scale should be used for all sketches and drawings. The recommended scale is 1/4 inch = 1 foot. Drawings to this scale that do not fit on 8-1/2 × 11-inch paper may be provided as sectional drawings. Please also include a compass directional arrow to indicate “North.”
- Specify shielding materials (e.g., concrete, lead) and means for securing radioactive materials from unauthorized removal.
- Illustrate area(s) where explosive, flammable, or other hazardous materials may be stored, as applicable.
- Identify area(s) where radioactive materials may become airborne. The diagram should contain descriptions of the ventilation systems, with pertinent airflow rates, filtration equipment, sample collection points, and monitoring systems.
- Identify specialized handling tools, facility safety interlocks designed to prevent operation of radiological safety systems in the event that operation of a system could result in accidental exposure or release of material [e.g., high efficiency particulate air (HEPA) filters, ventilation system, safety door interlocks, etc.] or equipment.
- Identify radioactive waste handling equipment that includes, for example, incinerators, compactors, solidification equipment, hold-up tanks, and sample collection points.

In addition, describe:

- Engineered safety systems (e.g., area monitors, interlocks, alarms).
- Protective clothing (i.e., latex or rubber gloves, lab coats or coveralls, respirators, booties, and face shields), auxiliary shielding, absorbent materials, secondary containers for wastewater storage for decontamination purposes, plastic bags for storing contaminated items, etc., that will be available for use when handling unsealed or uncontained radioactive materials.
- The general location of each proposed permanent facility (e.g., an industrial park, an office complex) and its current use. If any proposed permanent facility is a private residence, provide diagrams of the installation that include the building, the proposed restricted area or areas, and adjacent areas, including above and below the restricted areas; provide commitments that restricted areas do not include residential

quarters, and explain how radiation levels in unrestricted areas will be maintained at less than 1 mSv [100 mrem] per year.

- The proposed nuclear laundry facilities, if applicable, used for contaminated protective equipment and clothing. Specify how the contaminated wastewater from the laundry machines or sinks is disposed. Operating and emergency procedures should address decontamination of the laundry area and equipment.

3. Section 8.11, "Termination of Activities," of the guidance, describes the information needed to demonstrate that the former facility is suitable for release to unrestricted use.

Your request identified that you have ceased all licensed operations at your former facility located at 13397 Lakefront Drive, Earth City, MO 63045, but did not include a closeout survey report demonstrating that the former site is suitable for release to unrestricted use.

To proceed with releasing the former facility to unrestricted use, please provide the following information in support of your request to remove the location from your license:

A. Submit records of transfer and/or disposal for all licensed materials previously used and/or stored at the former location. If transferred to another location in your organization, please state that and identify the licensed materials that were transferred and the date of the transfer. If transferred outside of your organization, please provide a copy of the transferee's license and a letter confirming receipt of the transferred licensed material.

B. Submit a complete closeout survey report including:

- diagrams of each facility (area(s) of use and/or locations/addresses of use) with exposure rate survey and removable contamination wipe test results keyed to specific locations, as appropriate;
- the name and position of the person(s) performing the survey;
- the last date(s) of use for each radioactive material possessed, used or stored in the areas of use you are requesting to release for unrestricted use. This includes sealed and unsealed materials;
- the date(s) when the surveys were performed;
- the instrument(s) used for exposure rate measurements and for analysis of the wipes;
- background readings and each instruments' efficiency or correction factor. Include the energy level(s) and energy level "windows" you counted for;
- the date(s) that the survey instrument(s) were last calibrated;
- the action levels for both exposure rate measurements and wipe tests. Include the functional identity of areas exceeding these levels, corrective actions taken and results of corrective actions taken; and
- if sealed sources were used in the affected areas/locations, please include a copy of the most recent inventory and leak test results for each source.

C. Provide a historical site assessment, including a description of any incidents involving ruptured, leaking or lost sealed sources or devices along with any other incidents involving radioactive materials at the former facility.

4. Section 8.13, “Item 13: Certification,” specifies that a representative of the legal entity filing the license amendment must sign and date the request. The representative signing the amendment request must be authorized to make binding commitments and to sign official documents on behalf of the applicant (i.e., a management representative).

You signed the submitted license amendment request. Though, your title is not recognized as that of a management representative (i.e., President, Director or Manager).

Therefore, please revise and resubmit the amendment request bearing the signature of a management representative. For additional information, you may refer to Chapter 3, “Management Responsibility,” of the guidance.

In accordance with 10 CFR §2.390 of the NRC’s “Rules of Practice,” a copy of this letter and its enclosure will be made available electronically for public inspection in the NRC Public Document Room or from the NRC's Agencywide Documents Access and Management System (ADAMS), accessible from the NRC website at https://www.nrc.gov/reading-rm/adams.html.

To continue review of your request, please submit your response to this letter within 15 calendar days from the date of this letter. In your response, please refer to the license, docket, and control number specified below. I will assume that you do not wish to further pursue this licensing action if I do not receive a reply within the specified timeframe noted above.

If you have questions, require additional time to respond, or require clarification on any of the information stated above, I encourage you to contact me at (630) 829-9737 or via e-mail at Jason.Kelly@nrc.gov.

Sincerely,

Digitally signed by JASON KELLY
Date: 2026.01.13 15:42:02 -06'00'
Adobe Acrobat version: 2025.001.20997

Jason M. Kelly, MPH, CPH
Health Physicist
Materials Licensing Branch

Control No.: 654541
Docket No.: 030-37229
License No.: 24-32591-01