UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

October 15, 2026

Chris J. Grassano,
Director, DEVCOM AC
Department of the Army
US Army DEVCOM AC
Building 355 Risk Management Division
Picatinny Arsenal, NJ 07806

SUBJECT: DEPARTMENT OF THE ARMY, REQUEST FOR ADDITIONAL INFORMATION, MAIL CONTROL NO. 659166.

Dear Chris Grassano:

This is in reference to your application dated April 16, 2026, requesting to renew NRC License No. Sub-348. In order to continue our review, we need the following additional information:

1. Your application states that the guidance used for your program includes NUREG-1556, Volume 7, and NUREG-1556, Volume 11, as well as Regulatory Guide 8.23, "Radiation Safety Surveys at Medical Institutions." NUREG-1556, Volume 7, and NUREG-1556, Volume 11 have been revised and replaced by Revision 1, and Regulatory Guide 8.23 was withdrawn on August 7, 2018 (83 FR 38729). The criteria, to varying degrees, in NUREG-1556, Volume 7, Revision 1, and NUREG-1556, Volume 11, Revision 1 are currently used as regulatory guidance for source material programs.

   Provide the following:

   A commitment to review and update your program to meet the criteria in NUREG-1556, Volume 7, Revision 1, and/or NUREG-1556, Volume 11, Revision 1, as applicable.

   In addition, for your survey program, provide **one** of the following in accordance with the guidance in NUREG-1556, Vol. 11, Rev. 1, Section 8.10.7 **"**Surveys and Leak Tests**"**:

   Submit updated procedures to evaluate radiological hazards, both external and internal.

   OR

   As an alternative, you may state, "We will survey our facility and maintain contamination levels and perform bioassays of occupationally exposed workers in accordance with the survey frequencies and contamination levels published in Appendix L of NUREG-1556, Volume 11, Revision 1, 'Consolidated Guidance About Materials Licenses: Program-Specific Guidance About Licenses of Broad Scope.'"

2. NUREG-1556, Vol. 7, Rev. 1, Section 8.10.2 "Radiation Monitoring Instruments" states licensees must possess, or have access to, radiation monitoring instruments that are necessary to protect health and minimize danger to life or property. Instruments used for quantitative radiation measurements must be calibrated periodically for the radiation

measured. Specifically, the NUREG states that instruments will be calibrated before first use, at least annually thereafter, and after any repair, by a vendor that the NRC or an Agreement State has licensed to perform instrument calibration.

Your application does not specify the frequency of your instrument's calibration and if they will be calibrated before first use or after repair.

For Instrument Calibration

State that instruments will be calibrated before first use, at least annually thereafter, and after any repair, by a vendor that the NRC or an Agreement State has licensed to perform instrument calibration.

3. NUREG-1556, Vol. 7, Rev. 1, Section 8.10.3 "Material Receipt and Accountability" states that procedures will be developed, implemented, and maintained for ensuring accountability of licensed materials at all times and inventories will be conducted at intervals not to exceed 6 months or to provide a description of procedures.

   Your current license has a commitment to inventory not to exceed 6 months, your application states at least once a year.

   Confirm that the inventory will be done at least every 6 months.

4. NUREG-1556, Vol. 7, Rev. 1, Section 8.10.4 "Occupational Dose" states that Licensees must evaluate the potential occupational exposure of all workers and monitor occupational exposure in accordance with the following regulations: 10 CFR 19.13, 10 CFR 20.1201, 10 CFR 20.1202, 10 CFR 20.1203, 10 CFR 20.1204, 10 CFR 20.1207, 10 CFR 20.1208, 10 CFR 20.1501, 10 CFR 20.1502, 10 CFR 20.1703, 10 CFR 2104, 10 CFR 20.2106, and 10 CFR 20 Appendix B.

   Your application committed to NUREG-1556, Vol.7, 'Consolidate Guidance about Materials Licenses: Program-Specific Guidance about Academic, Research and Development and Other Licenses of Limited Scope," instead of NUREG–1556, Volume 7, Revision 1, 'Consolidated Guidance About Materials Licenses: Program-Specific Guidance About Academic, Research and Development and Other Licenses of Limited Scope.

   Provide the following:

   "We will maintain, for inspection by the NRC, documentation demonstrating that unmonitored individuals are not likely to receive a radiation dose in excess of the limits in 10 CFR 20.1502."

   AND/OR

   "We will monitor individuals in accordance with the guidance in the section titled, 'Radiation Safety Program–Occupational Dose' in NUREG–1556, Volume 7, Revision 1, 'Consolidated Guidance About Materials Licenses: Program-Specific Guidance About Academic, Research and Development and Other Licenses of Limited Scope.'"

5. Your application, under Section 10.5 Public Dose, states to use Appendix O for examples.

For awareness, NUREG 1556, Vol. 7, Rev. 1, Section 8.10.5 “Occupational Dose” states this is now Appendix K.

No response is required for this item.

6. NUREG-1556, Vol. 7, Rev. 1, Section 8.9 “Facilities and Equipment” states to provide the following:

A diagram showing the locations of shielding, the proximity of radiation sources to unrestricted areas, areas containing flammable or hazardous materials; and other items related to radiation safety.

— When applicable to facilities where radioactive materials may become airborne, the diagrams should contain schematic descriptions of the ventilation systems, with pertinent airflow rates, pressures, filtration equipment, and monitoring systems.

Your application only includes diagram and a description of your facilities. Your application does not include a description of airborne monitoring systems or capabilities.

Please provide a general description of your air monitoring systems or capabilities for your facilities.

7. Your application states under section 7.4, “The supervisor is responsible for day-to-day radiation safety supervision and reporting to management unsafe acts or conditions”.

Does the reporting to management include the Radiation Safety Officer? If not, ensure that the Radiation Safety Officer is informed.

8. NUREG-1757, Vol. 3, Rev. 1, Section 4.3.1 “General Criteria Applicable to All Financial Assurance Mechanisms” states that the financial assurance mechanism needs to be an originally signed duplicate. Generally, we have accepted a Hard Copy or a printable PDF file.

Your application includes pictures of the Statement of Intent and the Certificate of Financial Assurance.

Provide a PDF file or, alternatively, mail it to the U.S. NRC Region I office at 475 Allendale Road, Suite 102, King of Prussia, PA 19406-1415.

9. The Decommissioning Funding Plan (DFP) submitted has sections that are not readily readable, please submit a copy that is readily readable.

10. There are parts of the submitted DFP that reference prior year rates; specifically, Fiscal Year (FY) 2020 Escalation Rate and the Inventory/processing/disposal using 2023 rates.

    Considering recent inflation, please confirm and provide justification if these rates are comparable to the current FY. If they are not, please update and resubmit using the updated data.

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

R1DRSSMail.Resource@nrc.gov
Reference – Sloan Scott, Health Physicist
Mail Control No. 659166

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: www.nrc.gov. Additional information regarding use of radioactive materials may be obtained on the NRC Web Site at: http://www.nrc.gov/materials/miau/mat-toolkits.html. 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).

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 610-337-5273 or via electronic mail at john.scott@nrc.gov.

Thank you for your cooperation.

Sincerely,

JOHN SCOTT

Digitally signed by JOHN SCOTT
Date: 2026.10.15 19:18:00 -04'00'

Sloan Scott, Health Physicist
Inspection and Licensing Branch East
Division of Federal Materials Programs
Office of Nuclear Material Safety and Safeguards

License No. SUB-348
Docket No. 040-06377
Mail Control No. 659166

cc: Malgorzata Kouretas, Radiation Safety Officer