

**From:** Lawyer, Dennis  
**Sent:** Thursday, December 29, 2011 2:49 PM  
**To:** 'richard.w.lamoreaux@us.army.mil'  
**Subject:** Department of the Army, Request for Additional Information  
Concerning Application for a License Renewal, Control 576483

Dear Mr. Lamoreaux,

This is in reference to your application dated November 29, 2011, requesting for renewal to Nuclear Regulatory Commission License No. 29-00047-02, Docket No. 03005215. In order to continue our review, we need the following additional information:

1. In your application, there was a slight address change. Please confirm if "Attn: RDAR-D" should remain in the address.
2. 10 CFR 30.35 requires that licensees authorized to possess and use unsealed licensed material with a half-life greater than 120 days in quantities greater than those described in 10 CFR 30.35(a) must submit decommissioning funding plan (DFP) in any new or renewal application. This plan must include an actual estimate of the costs for decommissioning your facility and a description of the methods of assuring funds in accordance with 10 CFR 30.35(e). The appropriate level of detail for the cost estimate is discussed in Appendix A.3 to Volume 3 of NUREG-1757, "Consolidated NMSS Decommissioning Guidance." If the DFP cost estimate is greater than your current certification of financial assurance, you must submit a revised financial assurance instrument in the prescribed amount of the cost estimate. Please follow closely the recommended wording for financial assurance mechanisms found Appendix A to Volume 3 of NUREG-1757. It is noted that the last cost estimate was dated January 8, 2008, and thus needs to be updated and submitted as part of this renewal.
3. One of the authorized use locations listed on your license is that sealed self-luminous sources may be used at temporary job sites of the licensee anywhere in the United States. You did not provide the methodology of control for this material at temporary job sites. It is noted that current License Condition 20 stated that the licensee may possess and use sealed self-luminous sources in accordance with "General Policy for Storage, Handling, and Testing of Radioactive Illuminated Fire Control Equipment and/or Component," but this document was not submitted with the renewal application. Please submit the methodology for storage, handling and testing of sealed self-luminous sources at temporary job locations.
4. 10 CFR 30.32(g) requires that an application for a specific license to use byproduct material in the form of a sealed source or in a device that contains a sealed source must either identify the source or device by manufacturer and model number as registered with the U.S. Nuclear Regulatory Commission under 10 CFR 32.210 or with an Agreement State; **or** contain the information identified in 10 CFR 32.210(c). Please provide this information for the sealed source(s) requested in your application. If this information is not available, please consider modifying your application forms and amounts and adjusting your Decommissioning Funding Plan as appropriate.
5. In section 8.7.2 of NUREG-1757, Volume 11, "Consolidated Guidance about Material Licenses, Program-Specific Guidance About Licenses of Broad Scope," it states for

applicants to submit the number of members constituting a quorum of their Radiation Safety Committee. You stated this requirement in the Ionizing Radiation Control Committee Charter but then stated that you could change the items in the charter. Please commit to the minimum number of members constituting a quorum for your Ionizing Radiation Control Committee.

6. Currently your license provides greater flexibility to make program changes and changes to procedures specifically identified in documents which were previously approved by the Commission and incorporated into the license, without prior Commission approval as stated in your current License Condition 23. In your renewal application you did not request for additional flexibility. Please confirm that you do not desire this license condition or please provide the following statements.
  - a. Changes to your program and procedures will be limited to the following areas: training; audit program; radiation monitoring instruments; material receipt and accountability; safe use of radionuclides and emergency procedures; and radiation surveys. In addition, state that you will apply for, and receive an amendment to your license prior to implementing any other programmatic or procedural changes.
  - b. The proposed revision will be documented, reviewed, and approved by the your Radiation Safety Committee in accordance with established procedures prior to implementation.
  - c. The revised program will be in accordance with regulatory requirements, will not change the license conditions, and will not decrease the effectiveness of the Radiation Safety Program.
  - d. Your staff will be trained in the revised procedures prior to implementation.
  - e. Your audit program will evaluate the effectiveness of the change and its implementation.
7. In section 10.3.1 of your application you stated, "Application of yellow and magenta colored stickers (black and white stickers may be substituted for colored if color not available) containing the ionizing radiation propeller blade symbol..." 10 CFR 20.1901(a)(2) states, "The background is to be yellow." Unless the symbol is in a high temperature environment, it is against regulation to use black and white stickers containing the ionizing radiation propeller blade symbol. Please confirm that you will not use black and white propeller blade symbols unless it is a high temperature consideration.
8. In your application, you did not submit procedures to release material by decay in storage methods. Currently this is authorized by License Condition 19 on your license. Please confirm that you do not need this authorization or submit the procedures to support decay in storage release.

We will continue our review upon receipt of this information. Please reply to my attention at the Region 1 Office and refer to Mail Control No. 576483. If you have technical questions regarding this letter, please call me at (610) 337-5366.

*Please note that you may not reply to this letter by return e-mail. Your reply must be in writing by letter or facsimile (610-337-5269). 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 application.*