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030-20934

April 12, 2000

Mr. John R. McGrath  
Senior Health Physicist  
United State Nuclear Regulatory Commission  
Division of Nuclear Material Safety  
475 Allendale Road  
King of Prussia, PA 19406-1415

RE: License No. 37-23341-01 - Amendment Request

Dear Mr. McGrath:

The intent of this license amendment request is to modify the uranium bioassay program for UniTech Services Group, Inc. (UniTech). Currently UniTech conducts uranium bioassay quarterly whenever uranium is indicated on incoming shipping papers. UniTech respectfully requests to modify its bioassay program as follows.

- 1) UniTech will implement a program for uranium bioassay only when uranium contaminated clothing is received from customers who would normally be required to implement such a program for their employees; i.e., uranium mills or fuel fabrication facilities.
- 2) When implemented, the bioassay program will involve all employees who work (sort clothing, load/unload washers, load dryers or perform maintenance) in designated contaminated areas as specified in the license.
- 3) When implemented, bioassays will be conducted prior to potential exposures (baseline), every 6 months thereafter while potential occupational exposure continues, and following the final potential occupational exposure.<sup>1</sup>

The basis of the program as outlined below is supported by several years of negative data. Attached is a summary of all data for the past 3 years. Development of specific program elements is based primarily on the following two documents.

*Regulatory Guide 8.11, Application of Bioassay for Uranium*

*Regulatory Guide 8.12, Bioassay at Uranium Mills.*

<sup>1</sup> For terminating employees, failure to participate in the program will be documented in writing with proof of mailing.

NMSS/RGN-002

128009



## BIOASSAY PROGRAM FOR URANIUM

### Criteria for Implementation

Uranium is listed as a nuclide on the shipping papers from numerous customers at nearly all UniTech facilities. However, uranium is usually a very small fraction of the total activity received in laundry shipments, often present only in trace amounts. Typically, the customers indicating uranium on shipping papers are not required, nor do they implement, a bioassay program specific for uranium at their facilities. Urinalysis for uranium is indicated only when significant amounts of loose uranium are being processed. UniTech will implement the proposed uranium bioassay program when processing uranium mill or fuel fabrication customers.

### Action Levels

The UniTech Action Level is 5 µg/L. This action level is conservatively 1/3 of the lowest criteria (15 µg/L) indicated in Table 1 of the U.S. Nuclear Regulatory Commission Regulatory Guide 8.22, Bioassay at Uranium Mills. If UniTech's Action Level is exceeded, the affected employee will be immediately re-sampled and an investigation into potential causes will be conducted. Corrective actions will be implemented if indicated by the investigation.

### Procedures

Bioassay for uranium will be performed by a qualified vendor. Currently, analysis is performed by Thermo Nutech, TNU (formerly a division of TMA Eberline) in accordance with Method ASTM D5174 modified. The method utilized is Kinetic Phosphorescence Analysis (KPA). (See ANSI/HPS N13.30-1996, A.5.13.2, page 59)

### Frequency/Method Detection Limit

The frequency of urinalysis is based on US NRC Reg. Guide 8.11, Application of Bioassay for Uranium, for the minimum bioassay program. (See Reg. Guide 3.c., Table 2, and Figure 4.) The minimum bioassay program indicates that semi-annual frequency is appropriate. The current analytical detection limit is 0.03 µg/L which is very conservatively consistent with the criteria in Figure 4 of Reg. Guide 8.11.<sup>2</sup> This determination incorporates the most conservative assumptions as identified in the footnote.

### Personnel Participation

Notwithstanding the provisions of Regulatory Guide 8.11, 3.d to limit the number of employees participating in the sample group during each sampling period, UniTech will sample all

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<sup>2</sup> Figure 4 of Reg Guide 8.11 indicates that a 0.1 µg/L measurement sensitivity is sufficient to detect a 2.7 mg intake of Class "D" natural uranium (DAC = 5E-10 µCi/cc) with greater than 210 days between measurements. UniTech calculates the mass of uranium due to the inhalation of the Class "Y" natural uranium (DAC = 2E-11 µCi/cc) for an entire year at the DAC to be 676 mg. A corresponding intake at 10% of the DAC for 6 months would result in 33.8 mg. This value would increase to 845 mg for Class D uranium.

personnel conducting work in areas designated as contaminated areas during periods when the Uranium bioassay program is required to be implemented.

### Records

Records of bioassay results are kept at the individual UniTech facilities for 3 years. Thereafter, records may be shipped to a storage facility and may be produced upon request. Records will be reviewed during annual audits conducted by Corporate Health Physics and Engineering personnel. All records are available for inspection.

### Special Circumstances Requiring Bioassay

Bioassay sampling will also be implemented in special circumstances as follows.

- 1) Following an incident such as a fire, spill, equipment malfunction, or other departure from normal operation which caused, or could have caused, abnormally high concentrations of uranium in air. (See Regulatory Guide 8.11, 3.a, paragraph 5.)
- 2) When airborne concentrations have indicated the presence of uranium at or above 10% of the DAC. This evaluation will be based on the results of isotopic analysis at the end of a calendar quarter. Isotopic analysis is conducted on a composite of all samples for a particular sampling location at the end of a calendar quarter when any individual samples has exceeded 10% of the DAC based on a gross alpha (or beta-gamma) analysis for the most restrictive nuclide being processed during the sample period. Isotopic analysis is conducted prior to the end of the quarter if total DAC-hours for the quarter reach or exceed 50. UniTech's Action Level (10% of the DAC, or  $2 \times 10^{-12}$   $\mu\text{Ci/ml}$ ) for additional evaluation is 50 times below the suggested threshold provided in Regulatory Guide 8.22, Section 2.
- 3) Personnel contamination events involving contamination on the face of any individual when uranium contaminated clothing was processed. Note: A chest count designed for Co-60 would also be conducted in this event.
- 4) Whenever an in-vivo chest count indicated any activity above the action limit.
- 5) Upon direction of the Plant Manager/RSO, HP Supervisor, Production Supervisor, or Corporate Health Physics staff. Factors considered by these individuals that would result in such direction include observance of poor work practice(s) that might result in an internal uptake.

## CONSIDERATION OF PRIOR DATA

### Results of Bioassay

The results of all bioassays since early 1997 are included. A few comments are warranted.

The results of 2335 sample during the past 3 years are overwhelmingly negative. The results of 99.57% of the samples were within the range of naturally occurring uranium excreted by reference man; i.e., less than  $0.36 \mu\text{g/L}^3$ . Based on another study, 99.91% of the results were less than the mean of uranium excreted by non-occupationally exposed individuals; i.e., less than or equal to  $1.00 \mu\text{g/L}^4$ . Only 0.09% of the results were greater than  $1.00 \mu\text{g/L}$ .

With reference to the two results greater than  $1.00 \mu\text{g/L}$ , the following discussion is presented. The result of one sample is suspect since this sample was the initial/baseline sample for a new employee who had not yet been potentially exposed to occupational airborne radioactivity at UniTech or any other nuclear facility. Both results are suspect since neither employee worked in contaminated areas where unwashed contaminated clothing is handled. Furthermore, based on a review of 76 other samples collected for the same periods covered by these two results, no other sample was greater than the analytical MDA of  $0.03 \mu\text{g/L}$ , including several samples from employees working in sorting and washroom areas handling unwashed clothing. Additionally, there were no unusual airborne concentrations detected during either period. Based on all of this information, UniTech has determined that neither of the two data points above  $1.00 \mu\text{g/L}$  was due to occupational exposure to airborne radioactivity. Sample contamination, either during collection or in the laboratory, is suspected.

### UniTech's Air Sampling Program

It is important to note that UniTech air sampling program is not conducted to evaluate occupational exposures; that is the data is not used to conduct an ALARA benefit analysis with regard to a respiratory protection program, monitor or assign dose. UniTech's air sampling program is used to collect negative data; that is, data that confirms that employees are not exposed to airborne concentrations of radioactive material, including uranium, greater than or equal to 10% of the Derived Air Concentration (DAC) for any nuclide. Accordingly, no internal dose assignment is required in accordance with the provisions of 10 CFR 20, 1204(g).

Notwithstanding the foregoing, UniTech's long-standing air sampling program is quite well developed. INS facilities typically have 15 to 30 fixed air sample head locations. Air sample heads are located in the breathing zone, typically between 5'6" and 6'6" depending on their

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<sup>3</sup> ICRP (1975) International Commission on Radiological Protection. Report of the Task Group on Reference Man. ICRP Publication 23, (Pergamon Press, Elmsford, New York). NOTE: ICRP Publication 23 reported a background range of uranium in urine of 0.05 to  $0.5 \mu\text{g/d}$ . Reference Man's given urinary excreta rate of 1.4 L/d results in the indicated upper concentration of  $0.36 \mu\text{g/L}$ .

<sup>4</sup> DRUTMAN, R.D. and MORDASHEVA, V.V. (1985). "Natural uranium content in human organs and excreta," in *Gigiena i Sanit.* 7, 61-64. NOTE: This study involved 483 urine samples (254 women, 229 men) with a mean urinary content of  $1.4 \pm 0.1 \mu\text{g}$ . The mean concentration for women would be approximately  $1.4 \mu\text{g/L}$  since Reference Woman excretes 1.0 L/d.

location (as low as 5'6" if they can be located next to a piece of fixed equipment and as high as 6'6" if located in a more open traffic-area of the facility). Sample filters are exchanged and counted either daily or weekly. Sample filters in areas conservatively designated as contaminated areas are typically exchanged daily and counted after a 48 to 72 hour radon decay period. UniTech has not identified any sample head with concentrations exceeding 10% of the DAC for any nuclide based on isotopic analysis.

#### In-vivo Bioassay

INS conducts in-vivo bioassays for Co-60 activity in the lungs. In-vivo chest counts are conducted quarterly and are designed to detect 2.5% of the ALI due to an acute inhalation exposure at the beginning to the quarter (actually 120 days prior to allow for operational scheduling flexibility). Incorporating these assumptions into the development of the program ensures that any chronic exposures during the quarter would be identified due to airborne concentrations of 10% of the Co-60 DAC.

#### Airborne Radioactivity Controls

The principle means of controlling airborne radioactivity is through engineered controls. Localized exhaust ventilation where unwashed contaminated clothing is sorted and handled draws contaminants away from the personnel breathing zone. Entrained radioactive material then passes through a series of filters, including a large array of HEPA filters, and is sampled prior to being exhausted to the environment.

#### Facility Monitoring

Facility monitoring, other than air sampling, plays another important role in controlling potential levels of airborne radioactivity. Of primary interest in this respect are surveys for loose removable contamination. Daily plant surveys for removable contamination, as well as general area and contact dose rates, are conducted. In addition, removable contamination surveys are conducted between the processing of each customer. Decontamination actions are taken whenever contamination is identified above specified levels (see Appendix D, Section II.E. of the license application). Notwithstanding license requirements for taking action, plants typically take corrective action at levels significantly lower than those specified in the license; as low as the free release criteria of 20 and 200 dpm/100cm<sup>2</sup> alpha and beta-gamma, respectively. In addition, between-customer clean-up efforts, which are similar to decontamination actions, are conducted to minimize the potential spread of contamination from one customer's clothing to another, regardless of identified levels of contamination. These surveys and housekeeping efforts minimize surface contamination and the potential for airborne radioactivity.

Oversight of work activities is conducted in order to ensure that they are consistent with safe radiological practices. Employees are instructed in work practices that minimize the potential for airborne radioactivity. Supervisors continuously monitor work activities and clothing-handling techniques which are inconsistent with the instruction and training which employees receive and take corrective action as necessary. Corporate health physics staff also review clothing-handling techniques during annual corporate audits at all operating INS facilities. Survey records,

including contamination levels and air concentrations, are subject to inspection during the annual corporate health physics audit. During these corporate audits, an annual ALARA program review is conducted and recommendations made as appropriate.

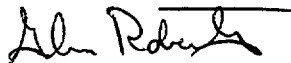
#### Compliance History

All program elements discussed are considered during inspections by regulatory agencies throughout all of UniTech's plants. UniTech's excellent compliance history further documents UniTech's successful and compliant implementation of all of these programs. UniTech's compliance record provides confirmation that programs are in place to sufficiently monitor workplace conditions and detect situations that would invoke appropriate uranium bioassay, as necessary.

#### Conclusion

UniTech believes that the data and program as committed to supports this request in accordance with regulatory guidance documents. UniTech trusts that the information provided is sufficient. However, if you have any questions, please do not hesitate to contact this office.

Sincerely,



Glenn Roberts, CHP  
Health Physicist  
UniTech Services Group, Inc.

cc: Mike Fuller, Manager, Health Physics and Engineering  
All UniTech Plant Managers/RSOs

# INS Corporation - Bioassay Data Summary

JANUARY 1997 TO PRESENT

Loc. No.	City, State	# of Samples	# < MDA (0.03)	0.03 < # < 0.36	0.36 < # <= 1.00	# > 1.00 ug/L
19	Springfield, MA	152	143	9	0	
79	Royersford, PA	335	329	6	0	
142	Richland, WA	258	244	14	0	
231	Morris, IL	214	200	14	0	
251	Columbia, SC	807	749	50	7	1
260	Macon, GA	428	410	17	0	1
285	Ontario, CA	141	128	12	1	
	TOTALS	2335	2203	122	8	2
	PERCENT	NA	94.35%	5.22%	0.34%	0.09%

# 019 - SPRINGFIELD, MA

Report Date	Report ID	# of Samples	ug/L			Comments
			# <=MDA (0.03)	0.03 < # <= 0.36	0.36 < # <= 1.0	
3/10/00	12123	12	12			
1/20/00	11974	2	2			
1/20/00	11871	16	14	2		
11/24/99	11573	5	5			
10/4/99	11273	1	1			
9/14/99	11083	15	15			
7/8/99	10679	6	6			
6/2/99	10468	13	13			
6/2/99	10458	11	11			
2/11/99	9596	9	9			
11/9/98	9106	8	8			
8/12/98	8360	8	8			
4/30/98	7652	7	7			
3/4/98	7370	6	6			
12/23/97	6988	7	7			
10/27/97	6743	1	1			
9/4/97	6281	9	7	2		
8/1/97	6170	1	0	1		
5/23/97	5939	15	11	4		
	TOTAL	152	143	9	0	



079 - ROYERSFORD, PA

Report Date	Report ID	# of Samples	ug/L			Comments
			# <=MDA (0.03)	0.03 < # <= 0.36	0.36 < # <= 1.0	
2/11/00	11985	11	11			
2/11/00	11982	12	12			
1/5/00	117750	3	3			Report ID is accurate
12/28/99	11729	10	10			
11/23/99	11563	17	17			
11/23/99	11562	17	17			
10/18/99	11345	10	10			
9/15/99	11091	9	9			
9/15/99	11090	9	9			
9/15/99	11089	17	17			
6/2/99	10457	6	6			
5/5/99	10283	8	8			
5/5/99	10282	15	15			
5/5/99	10281	12	12			
4/14/99	10150	6	6			
2/16/99	9707	12	12			
2/16/99	9706	10	10			
12/17/98	9341	3	3			
11/11/98	9119	17	17			
11/11/98	9118	7	7			
9/23/98	8730	4	4			
8/27/98	8436	10	10			
8/27/98	8435	9	9			
6/8/98	7864	4	4			
5/18/98	7756	9	9			
5/18/98	7755	12	12			
3/4/98	7350	11	11			
3/4/98	7349	10	10			
1/8/98	7074	3	3			
11/26/97	6862	11	10	1		
11/21/97	6848	13	13			
8/21/97	6264	13	13			
5/9/97	5890	15	10	5		
	TOTAL	335	329	6	0	

# 142 - Richland, WA

Report Date	Report ID	# of Samples	ug/L			Comments
			# <=MDA (0.03)	0.03 < # <= 0.36	0.36 < # <= 1.0	
2/11/00	11984	11	11			
2/11/00	11983	11	11			
11/24/99	11574	1	1			
11/18/99	11534	10	10			
11/18/99	11533	9	9			
10/20/99	11362	3	3			
9/14/99	11085	10	10			
9/14/99	11084	10	10			
7/8/99	10676	1	1			
6/2/99	10469	2	2			
5/14/99	10340	9	9			
5/14/99	10339	9	9			
3/26/99	10017	3	3			
3/9/99	9878	1	1			
2/16/99	9705	8	8			
2/16/99	9704	11	11			
12/3/98	9247	2	2			
11/13/98	9139	9	9			
11/13/98	9137	9	9			
11/11/98	9117	2	2			
10/15/98	8881	1	1			
9/23/98	0000	1	1			Report ID is correct.
8/11/98	8345	10	10			
8/11/98	8344	9	9			
6/8/98	7863	3	3			
5/14/98	7740	9	9			
5/14/98	7739	13	13			
4/6/98	7549	1	1			
3/4/98	7348	17	17			
1/8/98	7072	2	2			
11/21/97	6847	9	9			
11/21/97	6846	11	10	1		
10/20/97	6690	1	1			
10/7/97	6586	1	1			
10/7/97	6587	2	2			
9/4/97	6282	2	0	2		
8/11/97	6230	9	9			
8/11/97	6229	9	9			
6/20/97	6045	1	0	1		
5/5/97	5870	16	6	10		
	TOTAL	258	244	14	0	

### 231 - Morris, IL

Report Date	Report ID	# of Samples	ug/L			Comments
			# <=MDA (0.03)	0.03 < # <= 0.36	0.36 < # <= 1.0	
2/18/00	12019	16	16			
2/18/00	12018	3	3			
1/6/00	11795	4	4			
12/28/99	11730	1	1			
12/28/99	11712	12	12			
12/28/99	11711	9	9			
11/3/99	11452	14	14			
11/3/99	11451	7	7			
8/9/99	10855	12	12			
6/16/99	10507	1	1			
5/14/99	10338	9	9			
5/14/99	10337	10	10			
4/27/99	10244	9	9			
3/1/99	9826	2	2			
1/27/99	9590	13	13			
12/3/98	9248	12	12			
8/12/98	8359	11	11			
4/30/98	7653	17	17			
2/11/98	7220	12	12			
11/12/97	6808	12	10	2		
9/4/97	6280	13	9	4		
5/5/97	5871	15	7	8		
	TOTAL	214	200	14	0	

## 251 - Columbia, SC

Report Date	Report ID	# of Samples	ug/L			Comments
			# <=MDA (0.03)	0.03 < # <= 0.36	0.36 < # <= 1.0	
2/11/00	11981	14	14			
2/3/00	11943	14	13	1		
2/3/00	11942	14	12	2		
12/17/99	11701	14	14			
12/17/99	11700	14	14			
12/17/99	11699	14	14			
12/17/99	11698	14	14			
12/17/99	11697	15	15			
12/17/99	11696	15	15			
9/15/99	11106	14	14			
9/15/99	11105	13	13			
9/15/99	11104	7	7			
9/15/99	11103	17	17			
9/15/99	11102	17	17			
5/14/99	10346	9	9			
5/14/99	10345	9	9			
5/14/99	10344	17	16			1.55 Baseline
5/14/99	10343	17	17			
5/14/99	10342	17	17			
5/14/99	10341	17	17			
2/5/99	9595	15	15			
2/5/99	9594	14	14			
2/5/99	9493	14	14			
2/5/99	9592	15	15			
1/27/99	9591	17	17			
11/16/98	9149	5	5			
11/16/98	9148	14	14			
11/16/98	9147	16	16			
11/16/98	9146	17	17			
11/16/98	9145	16	16			
11/13/98	9144	17	17			
11/12/98	9151	1	0	1		0.09
10/5/98	8800	4	4			
8/24/98	8434	14	14			
10/24/98	8433	5	5			
8/24/98	8432	16	16			
8/24/98	8431	17	17			
5/18/98	7754	17	17			
5/14/98	7744	8	8			
5/14/98	7743	17	17			
5/14/98	7742	17	17			
3/2/98	7352	17	17			
3/4/98	7351	17	17			
2/19/98	7261	3	3			
2/19/98	7260	17	17			
2/19/98	7259	17	17			
1/8/98	7071	17	16	1		
12/23/97	6986	12	12			
12/23/97	6985	17	15	2		
8/11/97	6235	7	5	2		
8/11/97	6234	17	11	4	2	0.53, 0.38
8/11/97	6233	17	8	9		
8/11/97	6232	17	8	9		
4/28/97	5833	14	7	5	2	0.66 & 0.55
4/28/97	5832	17	12	5		
4/28/97	5831	11	7	4		
4/28/97	5830	17	11	4	2	1.00 & 0.72
4/28/97	5829	15	13	1	1	0.61
	TOTAL	807	749	50	7	1 greater than 1.00

## 260 - Macon, GA

Report Date	Report ID	# of Samples	ug/L			Comments
			# <=MDA (0.03)	0.03 < # <= 0.36	0.36 < # <= 1.0	
3/3/00	12093	13	13			
3/3/00	12092	14	14			
11/23/99	11564	11	11			Same ID as previous
11/23/99	11564	12	12			
9/14/99	11082	8	8			
9/14/98	11081	17	17			
9/14/98	11080	17	17			
6/2/99	10473	13	13			
6/2/99	10472	13	13			
6/2/99	10471	17	17			
6/2/99	10470	17	17			
6/2/99	10461	17	16	1		
6/2/99	10460	17	17			
6/2/99	10459	17	17			
3/1/99	9825	9	9			
3/1/99	9824	10	9			6.47 Cont. Suspect
12/17/98	9340	15	15			
12/17/98	9339	16	16			
12/17/98	9338	17	17			
8/5/98	8275	13	13			
6/29/98	7975	2	2			
5/14/98	7741	1	1			
4/30/98	7650	16	16			
4/10/98	7569	4	4			
4/6/98	7550	7	7			
3/4/98	7369	6	6			
2/19/98	7257	8	8			
2/19/98	7256	10	10			
1/8/98	7073	1	1			
12/23/97	6987	4	4			
11/19/97	6831	17	14	3		
11/18/97	6830	17	16	1		
10/20/97	6689	7	7			
10/20/97	6688	15	15			
8/1/97	6169	10	7	3		
5/9/97	5891	2	2			
5/1/97	5864	1	1			
5/1/97	5863	17	8	9		
	TOTAL	428	410	17	0	1 sample > 1.00

Additional Sample 6.48 - Rerun same aliquot of 6.47 result.  
Employee unavailable for new sample. Not included above as not to bias statistics.  
Contamination suspected as employee never worked in sorting area or washroom.

285 - Ontario, CA

Report Date	Report ID	# of Samples	ug/L			Comments
			# <=MDA (0.03)	0.03 < # <= 0.36	0.36 < # <= 1.0	
3/6/00	12103	1	1			
2/4/00	11954	9	9			
12/17/99	11695	1	1			
11/24/99	11575	1	1			
8/30/99	10945	8	8			
6/22/99	10588	2	2			
5/27/99	10442	2	2			
4/27/99	10250	12	12			
1/27/99	9589	16	16			
11/3/98	9047	9	9			
8/5/98	8276	9	9			
6/4/98	7850	2	2			
4/30/98	7651	11	11			
4/2/98	7504	5	5			
3/4/98	7371	2	2			
2/11/98	7219	9	9			
11/12/97	6807	12	12			
10/27/97	6744	6	5	1		
8/11/97	6236	10	6	3	1	0.61
6/5/97	5985	5	5			
5/1/97	5865	9	1	8		
	TOTAL	141	128	12	1	

128009

BETWEEN:

License Fee Management Branch, ARM  
and  
Regional Licensing Sections

(FOR LFMS USE)  
INFORMATION FROM LTS

: Program Code: 03218  
: Status Code: 0  
: Fee Category: 6A  
: Exp. Date: 20050831  
: Fee Comments: CALIBRATION IS FOR THEM  
: Decom Fin Assur Req'd: Y  
: .....

LICENSE FEE TRANSMITTAL

A. REGION

1. APPLICATION ATTACHED

Applicant/Licensee: UNITECH SERVICES GROUP, INC.  
Received Date: 20000414  
Docket No: 3020934  
Control No.: 128009  
License No.: 37-23341-01  
Action Type: Amendment

2. FEE ATTACHED

Amount: -----  
Check No.: -----

3. COMMENTS

Signed R. J. Brown  
Date 4-14-00

B. LICENSE FEE MANAGEMENT BRANCH (Check when milestone 03 is entered /\_\_/) )

1. Fee Category and Amount: -----

2. Correct Fee Paid. Application may be processed for:

Amendment -----  
Renewal -----  
License -----

3. OTHER -----  
-----

Signed -----  
Date -----

This is to acknowledge the receipt of your letter/application dated

4-12-00, and to inform you that the initial processing which includes an administrative review has been performed.

☒ *Amend* 37-23341-01  
There were no administrative omissions. Your application was assigned to a technical reviewer. Please note that the technical review may identify additional omissions or require additional information.

☐ Please provide to this office within 30 days of your receipt of this card

A copy of your action has been forwarded to our License Fee & Accounts Receivable Branch, who will contact you separately if there is a fee issue involved.

Your action has been assigned Mail Control Number **128009**.  
When calling to inquire about this action, please refer to this control number.  
You may call us on (610) 337-5398, or 337-5260.

NRC FORM 532 (RI)  
(6-86)

Sincerely,  
Licensing Assistance Team Leader