



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION I
475 ALLENDALE ROAD
KING OF PRUSSIA, PENNSYLVANIA 19406-1415

November 24, 2004

Docket No. 03004545
Control No. 135253

License No. 19-08330-02

Colonel David G. Jarrett, MC
Director
Uniformed Services University of the Health Sciences
Armed Forces Radiobiology Research Institute
8901 Wisconsin Avenue
Bethesda, MD 20889-5603

SUBJECT: UNIFORMED SERVICES UNIVERSITY OF THE HEALTH SCIENCES,
REQUEST FOR ADDITIONAL INFORMATION CONCERNING APPLICATION
FOR RENEWAL OF LICENSE, CONTROL NO. 135253

Dear Colonel Jarrett:

This is in reference to your application dated June 28, 2004 requesting to renew Nuclear Regulatory Commission License No. 19-08330-02. In order to continue our review, we need the following additional information:

1. Please provide the manufacturer's name and sealed source model number for the sealed sources requested in Items 5.I, 5.J., and 5. M. of your application.
2. Please provide a copy of senior management's written statement of delegation of authority to the Radiation Safety Officer (RSO). This statement should include the requisite authority to communicate with and direct your personnel regarding NRC regulations and license provisions and to enforce these requirements including the ability to terminate any unsafe operation involving the use of licensed material. Appendix J of NUREG-1556, Volume 11 contains a model delegation of authority and may be helpful to you in developing your response.
3. Item 10.1 of your application describes radiation monitoring instruments maintained under your NRC license. Please submit the criteria used by your Radiation Safety Committee (RSC) and/or RSO to review and approve radiation monitoring instrumentation to assure that appropriate radiation monitoring equipment will be used during licensed activities. In addition, please describe how the RSC and/or RSO, as appropriate, will assure that instruments are properly calibrated at prescribed frequencies.

4. The following sections of Item 10.5, Radiation Protection Procedures, of your application do not contain all of the information needed to complete our review:
- A. Section 8.d. states that records of sealed source inventories shall be maintained for two years from the date of each inventory. Records of sealed source inventories are now required to be maintained for five years from the date of each inventory. Please confirm that you will maintain inventory records for five years from the date of each inventory and that you will update your procedures to reflect this new requirement.
 - B. Section 9.d. states that the preferred method of leak testing is to leave a dry wipe adjacent to the source for 16 hours or more, then remove and analyze the wipe. Please explain in more detail when this would be an acceptable procedure.
 - C. Sections 8 and 10 describe utilization of sealed and unsealed sources. Procedures are not provided for general rules for safe use of radioisotopes in laboratories or areas where radioactive material is used or stored. In addition, procedures for maintaining security of licensed radioactive material was not provided. Appendix R of NUREG-1556, Volume 11, "Program Specific Guidance About Licenses of Broad Scope" (enclosed), contains general topics for the safe use of radioactive material which are acceptable to NRC. Please provide your procedures for safe use of radionuclides, including security of material. As an alternative, you may state that you will adopt the procedures for the safe use of radionuclides as published in Appendix R of NUREG-1556, Volume 11.
 - D. Section 13 describes radiological emergency procedures for spill cleanup/decontamination. Procedures are not provided for handling emergencies such as minor spills of liquids and solids; major spills of liquids and solids; incidents involving radioactive dusts, mists, fumes, organic vapors, and gases; or fires, explosions or major emergencies. Appendix R of NUREG-1556, Volume 11, contains model emergency procedures which are acceptable to NRC. Please provide your procedures for handling emergencies. As an alternative, you may state that you will adopt the model emergency procedures as published in Appendix R of NUREG-1556, Volume 11.
 - E. Section 14 describes radioactive waste management procedures. Procedures for waste collection and segregation were not provided. Appendix V of NUREG-1556, Volume 11 contains model waste management procedures which are acceptable to NRC. Please provide revised waste management procedures that meet the requirements of Appendix V. As an alternative, you may state that you will adopt the model waste management procedures as published in Appendix V of NUREG-1556, Volume 11.

D. Jarrett
Uniformed Services University of the
Health Sciences

3

Please note that on October 25, 2004, the NRC suspended public access to ADAMS, and initiated an additional security review of publicly available documents to ensure that potentially sensitive information is removed from the ADAMS database accessible through the NRC's web site. Interested members of the public may obtain copies of the referenced documents for review and/or copying by contacting the NRC Public Document Room pending resumption of public access to ADAMS. The NRC Public Document Room is located at NRC Headquarters in Rockville, MD, and can be contacted at 800-397-4209 or 301-415-4737 or pdr@nrc.gov.

We will continue our review upon receipt of this information. Please reply to my attention at the Region I Office and refer to Mail Control No. 135253. If you have any technical questions regarding this deficiency letter, please call Donna Janda at (610) 337-5371.

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.

Sincerely,

Original signed by Elizabeth Ullrich

Elizabeth Ullrich
Senior Health Physicist
Commercial and R&D Branch
Division of Nuclear Materials Safety

Enclosures:

1. 10 CFR Parts 19, 20, and 30
2. NUREG-1556, Volume 11

cc:

LCDR Daniel S. Simpson, Radiation Safety Officer

D. Jarrett
Uniformed Services University of the
Health Sciences

4

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