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May 2, 2005

Thomas Thompson  
U.S. Nuclear Regulatory Commission  
By FAX to: 610 337 5269

Dear Mr. Thompson:

03031466

This is in response to your April 22, 2005 e-mail to me regarding NRC license 45-03499-06/ 03031466 MailControl 136516. I am responding here to the four questions you asked of me. I have copied your questions below in italics and my response follows in plane text.

1. *You have described a position "Restricted User" and indicated this person may supervise byproduct materials activities of others. NRC expects all authorized activities under the license be supervised by an Authorized User (AU) listed on your license. Therefore any work being performed by a radiation worker must be under the supervision of one of the AU's listed on your license. Please confirm this is your understanding.*

It is the case that all authorized activities under the license will be supervised by one of the Authorized Users on the license. More specifically, any Restricted User is always supervised by an Authorized User.

2. *You have identified alternate Radiation Safety Officers (RSO), however, NRC only recognizes one RSO as responsible for administering the radiation safety program. Duties may be delegated to alternates but not the responsibility. Please confirm that Dr. Bradley is to be named on the license as the RSO.*

Eric Bradley is to be named as the RSO on this license. As the RSO, I do understand that I am responsible for administering the radiation safety program. I have delegated certain duties to the alternates, but I do take full responsibility.

3. *You have referred to obsolete regulations on page 7, Standards for Occupational Radiation Workers. Please update this to the current 10 CFR 20.1201.*

136516

Section II of our Radiation Safety Manual that you have for review (Revised June 2004) states at the top of page 7 that the text is: "Taken from 10 CFR 20.1201 to 20.1207. Current standards shall in all cases supersede those listed below."

In order to properly address the current versions I will amend the above to indicate that our procedures adhere to 10CFR 20.1201 through 20.1208. I will also remove the current text for Section A and replace it with the verbatim text for 20.1201, 20.1207 and 20.1208. I believe that these corrections will bring the document into conformance with the current provisions. This change will be issued with revised Manuals beginning with the May 2005 training courses.

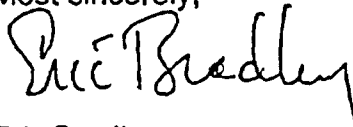
4. *Although you have described some features of your calibration of Survey meters and wipe test counting equipment please review NUREG-1556, Volume 7, Appendix M and provide equivalent information. You may also choose to simply subscribe to these procedures as indicated on page 8-24.*

I have reviewed NUREG-1556, Volume 7, Appendix M. We currently have five Ludlum Model 3 survey meters fitted with either Model 44-9 pancake GM probes, or model 44-3 scintillation probes. In addition, we have a Victoreen model 290 GM survey meter as a back up in the even of meter failure. The meters are calibrated annually by Ludlum. For all liquid scintillation counting of swipe samples we use a Beckman LS 6500 which is on an annual service contract for maintenance and calibration. I do subscribe to the procedures as indicated in 8.10.2 as follows:

"We will use instruments that meet the radiation monitoring instrument specifications published in Appendix M to NUREG-1556, Vol. 7, 'Program-Specific Guidance About Academic, Research and Development, and Other Laboratory Licenses of Limited Scope,' dated December 1999. We reserve the right to upgrade our survey instruments as necessary."

Thank you for the opportunity to make these changes in our application for renewal. Please contact me if there are any other concerns.

Most sincerely,



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Professor, Biology  
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