

## ACCEPTANCE REVIEW MEMO (ARM)

Licensee: EPA Kansas City, KS

License No.: 15-13753-01

Docket No.: 030-17795

Mail Control No.: 471077

Type of Action: Amend

Date of Requested Action: 08-04-06

Reviewer  
Assigned:

ARM reviewer(s): Torres

Response	Deficiencies Noted During Acceptance Review
	<ul style="list-style-type: none"><li>[ ] Open ended possession limits. Limit possession. Submit inventory.</li><li>[ ] Submit copies of most recent leak test results.</li><li>[ ] Add - delete IC license condition. Add IC paragraph in cover letter.</li><li>[ ] Split license from cover letter. Add SUNSI marking to license.</li><li>[ ] Ask the licensee if they have any type-amount of EPAct Material.</li></ul>

Reviewer's Initials:                     

Date:                     

- ☐ Yes ☐ No      Unrestricted release Group 2 or >: Transfer memo to FCDB within 10 days.
- ☐ Yes ☐ No      Decommissioning notification should be completed within 30 days.
- ☐ Yes ☐ No      Termination request < 90 days from date of expiration
- ☐ Yes ☐ No      Expedite (medical emergency, no RSO, location of use/storage not on license, RAM in possession not on license, other)
- ☐ Yes ☐ No      TAR needed to complete action.

Branch Chief's and/or Sr. HP's Initials:                     

Date:                     

### SUNSI Screening according to RIS 2005-31

☐ Yes ☒ No      **Non-Publicly Available, Sensitive** if any item below is checked

General guidance:

- \_\_\_\_\_ RAM = or > than Category 3 (Table 1, RIS 2005-31), use Unity Rule
- \_\_\_\_\_ Exact location of RAM (whether = or > than Category 3 or not)
- \_\_\_\_\_ Design of structure and/or equipment (site specific)
- \_\_\_\_\_ Information on nearby facilities
- \_\_\_\_\_ Detailed design drawings and/or performance information
- \_\_\_\_\_ Emergency planning and/or fire protection systems

Specific guidance for medical, industrial and academic (above Category 3):

- \_\_\_\_\_ RAM quantities and inventory
- \_\_\_\_\_ Manufacturer's name and model number of sealed sources & devices
- \_\_\_\_\_ Site drawings with exact location of RAM, description of facility
- \_\_\_\_\_ RAM security program information (locks, alarms, etc.)
- \_\_\_\_\_ Emergency Plan specifics (routes to/from RAM, response to security events)
- \_\_\_\_\_ Vulnerability/security assessment/accident-safety analysis/risk assess
- \_\_\_\_\_ Mailing lists related to security response

Branch Chief's and/or Sr. HP's Initials:                     

Date: 8/18/06

## Pre-Licensing Screening

### Applicant Information:

Control No. 471077

Name: EPA Kansas City, KS	Type of Request: Amend Program Code(s):	
Location: KS	License No.: 15-13753-01	Docket No.: 030-17795

### STEP 1—Radioactive Materials and Quantities Requested:

<b>Instructions for Step 1: Complete Step 1 for all applications.</b> If all your responses in Step 1 are "No" then do not complete Step 2 (Screening Criteria). Sign and date the completed step-sheet and add it as the sensitive and non-publicly available OAR in ADAMS. If a "yes" response is indicated for any item in Step 1, also complete Step 2. If the type of use is subject to a Security Order or the requirements for increased controls, complete Step 3 (Item A or Item B) without delay.		Yes or No
A.	The request is from a new applicant.	No
B.	NUREG-1556, Volume 20, Section 4.9 indicates a licensing site visit is needed for the requested type of use, e.g., (1) Type A broad scope license, (2) panoramic irradiator containing > 10000 curies, (3) manufacturers or distributors using unsealed radioactive material or significant quantities of sealed material, (4) radioactive waste brokers, (5) radioactive waste incinerators, (6) commercial nuclear laundries, and (7) any other application that in the judgement of the reviewer and cognizant supervisor involves complex technical issues, complex safety questions, or unprecedented issues that warrant a site visit.	No
C.	The applicant requested certain radionuclides and quantities that equal or exceed the Risk Significant Quantity (TBq) values in the table, below, that have been "highlighted" by the reviewer	No

### Table of Risk Significant Quantities

(Category 2 Quantities, IAEA Safety Guide No. RS-G-1.9, Categorization of Radioactive Sources, August 2005)

Radionuclide	Risk Significant Quantity (TBq) <sup>1</sup>	Risk Significant Quantity (Ci) <sup>1</sup>	Radionuclide	Risk Significant Quantity (TBq) <sup>1</sup>	Risk Significant Quantity (Ci) <sup>1</sup>
Am-241	0.6	16	Pm-147	400	11,000
Am-241/Be	0.6	16	Pu-238	0.6	16
Cf-252	0.2	5.4	Pu-239/Be	0.6	16
Cm-244	0.5	14	Ra-226 <sup>2</sup>	0.4	11
Co-60	0.3	8.1	Se-75	2	54
Cs-137	1	27	Sr-90 (Y-90)	10	270
Gd-153	10	270	Tm-170	200	5,400
Ir-192	0.8	22	Yb-169	3	81

<sup>1</sup> The primary values are TBq. The curie (Ci) values are for informational purposes only.

<sup>2</sup> The Atomic Energy Act, as amended by the Energy Policy Act of 2005, authorizes NRC to regulate Ra-226 and NRC is in the process of amending its regulations for discrete sources of Ra-226.

Calculations of the Total Activity or the Unity Rule are attached to document whether or not the screening criteria in Step 2 were also completed to evaluate the application. <b>NOTE—If an amendment of an existing license is being requested, the calculations will include the previously authorized quantities for the radionuclide(s).</b>	Yes, No, or Not Applicable (NA)
Total Activity—multiple activities are requested for a single radionuclide and the sum of the activities equals or exceeds the quantity of concern for the radionuclide	
Unity Rule—multiple radionuclides are requested and the sum of the ratios equals or exceeds unity, e.g., [(total activity for radionuclide A) ÷ (risk significant quantity for radionuclide A)] + [(total activity for radionuclide B) ÷ (risk significant quantity for radionuclide B)] ≥ 1.0.	

### Signature and Date for Step 1:

8/18/06  
 License Reviewer and Date



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VII  
901 NORTH 5TH STREET  
KANSAS CITY, KANSAS 66101  
04 AUG 2006

RECEIVED

AUG 09 2006

DNMS

ATC  
Attn: Nuclear Material Licensing Branch  
U.S. Nuclear Regulatory Commission  
611 Ryan Plaza Drive, Suite 400  
Arlington, Texas 76011

SUBJECT: Request for Amendment to License No. 15-13753-01

TO: Whom It May Concern:

We would like to request an amendment to Materials License No. 15-13753-01. We have appointed Mr. Charles A. Hooper as our Radiation Safety Officer (RSO) of record, replacing the interim RSO, Mr. Robert E. Dye. It is our understanding that conditions 11.A and 11.B will be affected by this amendment. Therefore, please amend the license to change any reference to Robert E. Dye with Charles A. Hooper.

Mr. Hooper is qualified by education and experience to perform the duties of Radiation Safety Officer. He joined our agency in June and before that worked in the radiation program at the Missouri Department of Health and Senior Services for seven years. He has passed Part I and taken Part II of the American Board of Health Physics exam. He received his Bachelors of Science degree in Nuclear Engineering from the University of Missouri-Rolla in 1992, and completed the five-week Applied Health Physics Course from the Oak Ridge Associated Universities in 2000.

Thank you in advance for your prompt consideration of this matter. We look forward to your reply.

Sincerely,

Carol Kathet, Acting Director  
Air, RCRA, and Toxics Division

copy

AUG 21 2006

DATE

This is to acknowledge the receipt of your letter/application dated 08-04-06, and to inform you that the initial processing, which includes an acceptance review, has been performed.

☒ There were no administrative omissions. Your application will be 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:

The action you requested is normally processed in 90 days.

☐ A copy of your action has been forwarded to the NRC Office of the Chief Financial Officer, who will contact you separately if there is a fee issue involved.

Your action has been assigned **Mail Control Number** 471077.

When you call to inquire about this action, please refer to this mail control number.

You may call me at 817-860-8103.

Sincerely,

*Colleen Murnahan*  
Licensing Assistant

(FOR LEMS USE)  
 INFORMATION FROM LTS  
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Program Code: 03123
Status Code: 0
Fee Category: EX 3P
Exp. Date: 20110430
Fee Comments:
Decom Fin Assur Regd: N
.....

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### A. REGION

2. FEE ATTACHED  
Amount:             
Check No.:

- Signed Colleen M. Munnich  
Date 8-16-06

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

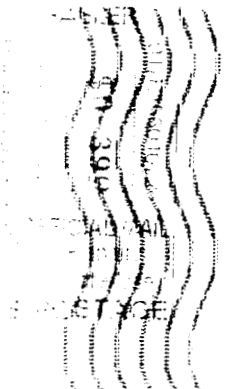
- Signed \_\_\_\_\_  
Date \_\_\_\_\_

UNITED STATES ENVIRONMENTAL  
PROTECTION AGENCY

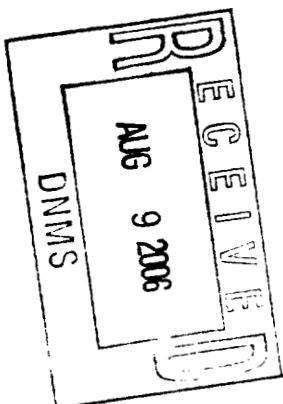
Region VII  
901 North 5th Street  
Kansas City, Kansas 66101

OFFICIAL BUSINESS  
Penalty for Private Use \$300

KANSAS CITY 64101  
07 AUG 2006



Attn: Nuclear Material Licensing  
Branch  
U. S. Nuclear Regulatory Commission  
611 Ryan Plaza Drive, Suite 400  
Arlington, Texas 76011



76011+4012

