

**From:** Gaskins, Farrah  
**Sent:** Tuesday, September 06, 2011 7:14 AM  
**To:** erich.salomon@bms.com  
**Subject:** Request for additional information

Dear Mr. Salomon:

This is in reference to your application dated June 21, 2011 requesting to renew Nuclear Regulatory Commission License No. 06-27843-02. You have submitted your Radiation safety Manual as a supplement to your application. While the manual does address many of the questions, additional information is need in some of the areas. In order to continue our review, we need the following additional information:

1. Your application should have been signed by a management representative. Please submit a letter signed by a management representative indicating that management has reviewed the application and concurs in the statements and representations contained therein. Note also that a management representative should sign all future correspondence that requests a change in your license.
2. Confirm that the Radiation Safety Manual is submitted as part of your license application and that any changes in the Manual information and procedures shall be submitted to the NRC and approved by amendment of your license prior to implementing the changes. Alternatively, you may submit the Radiation Safety Manual as a reference for specific procedures referred to in items of your license application; in this case only changes made in the referenced procedures would require amendment of the license. You may also minimize the need for frequent amendments if you specify those sections of your manual which are administrative in nature and/or do not reduce the level of safety. Such areas might include: modifications required by NRC rule changes; revision of internal management forms; selection of authorized contractors for dosimetry, waste disposal, calibration, and other similar services; references to specific manufacturers and/or models of equipment.
3. Your application states that there were no changes in radioactive materials since last amendment. As stated in the notice of expiration which was sent to you, we reserve the right to request a complete, up-to-date application and information in cases where licenses have been amended frequently or are supported by a large number of fragmented or disjointed documents. Please submit a list of all radionuclide's you wish to possess and the maximum desired possession limit for each. Please also include the intended purpose of use for each.
4. Describe the facilities and equipment (e.g., remote handling equipment, storage containers, shielding, fume hoods) to be made available at each location where licensed material will be used. Submit a description of the areas assigned for the receipt, storage, preparation, and measurement of licensed materials. Submit a diagram showing the locations of shielding, the proximity of radiation sources to unrestricted areas, and other items related to radiation safety. For facilities where licensed materials may become airborne, include schematic descriptions of the ventilation system, with pertinent airflow rates, pressures, filtration equipment, and monitoring instruments. Diagrams should be drawn to a specified scale, or dimensions should be indicated.

5. Provide a copy of senior management's written statement of delegation of authority to the Radiation Safety Officer. 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.
6. The Radiation Safety manual you have submitted contains information pertaining to the Radiation Safety Advisory Committee (RSAC). In addition to the information provided in the Radiation Safety Manual, also submit a description of the criteria used for selecting member to the RSAC, including what members and number of members constitute a quorum. The members indicated should be identified by position and title.
7. Describe the mechanisms used by executive management to ensure that adequate oversight of the program is exercised. In addition, describe the audit mechanism implemented by the RSO or other responsible individual to determine user compliance with NRC regulations, the terms and conditions of the NRC license, good health physics practices, and the requirement of approved permits.
8. Please provide your leak test procedures. As an alternative, you may provide the statement " we will implement the model leak test program published in Appendix T of NUREG-1556, Volume 11, " Program Specific Guidance About Licenses of Broad Scope"

Current NRC regulations and guidance are included on the NRC's website at [www.nrc.gov](http://www.nrc.gov); select **Nuclear Materials; Med, Ind, & Academic Uses**; then **Licensee Toolkits, see our toolkit index page**. You may also obtain these documents by contacting the Government Printing Office (GPO) toll-free at 1-866-512-1800. The GPO is open from 7:00 a.m. to 6:30 p.m. EST, Monday through Friday (except Federal holidays).

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. 575434 by fax (610-337-5269) or mail. E-mail responses are not accepted at this time. If you have any technical questions regarding this deficiency letter, please call me at (610) 337-5143.

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.

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