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Providing Insight Onsite

May 17, 2012

U.S. Nuclear Regulatory Commission
Region 1
2100 Renaissance Blvd, Suite 100
King of Prussia, PA 19406-2713

Certified Mail/RRR:
7009 1680 0001 1099 7990

Attn: Kathy Modes, Senior Health Physicist
Division of Nuclear Materials Safety

Re: License No. 07-28386-01 – Docket No. 030-31174 – Mail Control No. 577450
Material Transfer Report for 2010

Dear Ms. Modes:

Referencing your e-mail dated May 8, 2012 regarding William Mixon's letter dated April 13, 2012 concerning License Condition 17, we are providing the following additional information:

1. The correct reference in the last sentence of the first paragraph of the April 13, 2012 letter should have been 10 CFR 30.70.
2. The transfer report for 2011 was mailed after the 2010 report. You should have received the 2011 report prior to the receipt of this letter. If not, please contact me.
3. Our records indicate that the 2010 and 2011 reports were mailed to USNRC King of Prussia address only. The King of Prussia address was used pursuant to 10 CFR 30.6(a) reference to 30.6(b). This was an interpretation error on our part. This omission has been noted. Henceforth, future submissions will be mailed to the attention of 'Document Control Desk/Exemption Distribution' at the address referenced in 10 CFR 30.6(a)(1).



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4. No, we did not provide material transfer reports to the Agreement States. The transfer of an exempt concentration of material does not require a licensing action by the recipient. Subsequently, we are not aware of any requirement to provide secondary notifications of the transfer of an exempt concentration of a material to Agreement States.
5. Yes, we used our NRC license to obtain reciprocity with Agreement State(s).
6. We are assuming the 24 month decommissioning timeliness rule you are referring to is 10 CFR 30.36(d)(3). Tracer jobs are performed at temporary job sites, usually occurring over a one to two day period. This was the case with the job in St. Croix in 2008. When we leave a temporary job site we may or may not return to that same site with 24 months. Our return is totally dependent on the customer's need for our services. The job in question was the introduction of 62 mCi of Br-82 into the customer's liquid process containing 1,260,000 gallons. The introduction of Br-82 resulted in a .0000131 $\mu\text{Ci/ml}$ concentration, which was well below the allowable exempt concentration of .003 $\mu\text{Ci/ml}$. The Br-82 remained in the customer's closed system process. Br-82 has a half-life of 35 hours. The Br-82 was introduced internally and would have remained in the closed system for further decay. Subsequently, because the job in question did not involve a license expiration, license termination, or site decommissioning, we do not believe 10 CFR 30.36 is applicable.

Please do not hesitate to contact me at 281-291-7769 if additional information or clarification is required. .

Respectfully,



Norman P. Lanier
Corporate Radiation Safety Officer

cc: William Mixon – Tracerco NE Region Manager/RSO

