

Office of Nuclear Material Safety and Safeguards
U. S. Nuclear Regulatory Commission
Washington, DC 20555-0001

December 18, 2012

Attention: Document Control Desk

Attention: Richard D. Thompson, Program Manager, NMSS/FCSS/FMB

Subject: Letter of Intent to Submit a License Amendment to store SNM at Moffett Federal Airfield under the Rapiscan License

Reference: Docket No. 70-7021, License No. SNM-2018

Dear Mr. Thompson,

Rapiscan Laboratories hereby provides this Letter of Intent (LOI) to inform you of our intent to request two license amendments to Special Nuclear Material license SNM-2018.

Rapiscan would like to request following license amendments:

- a. To add the Moffett Federal Air Field test site to the license condition 11 "*Authorized place of storage*".
- b. To add 200 kg of Natural or depleted uranium, Solid metal of various forms .

Rapiscan will provide a comprehensive report for the Moffett Federal Air Field site in order to meet the requirements of 10CFR73.67 for special nuclear materials of low strategic significance. The report will include the following information:

- (1) The facility's construction, fire area determination (interior-rated walls), electrical installation, emergency lighting, life safety/egress, ventilation, and lightning protection
 - (i) The sources will be stored and used only within a controlled access area defined to be the Test Area. The Test Area and the Operator Room will be monitored with intrusion and fire alarms monitored by a commercial alarm company.
- (2) Procedures for dealing with threats of thefts or thefts of this material.
 - (i) The sources will be used under the direction and supervision of an Authorized User who has certified as Reliable and Trustworthy under Rapiscan's Increased Control Program.
 - (ii) Coordination with NASA Security and Emergency Responders.

- (3) Confirmation from the Radiation Safety Office of the NASA Ames Research Center Moffett Field that their radioactive material license does not include any SNM and that there is no SNM being currently used.
- (4) Authorization of PBAR Project Operation from NASA Ames Research Center.

In addition, the Rapiscan Laboratories' Radiation Protection Program will be fully implemented at the Moffett Federal Air Field site including the ALARA Program, Radio active Material Sealed Source Accountability and Control Guide as well as Rapiscan's emergency response as described in "Emergency Response Plan for Events Involving Radioactive Material Sealed Sources and Radiation Emitting Devices" dated January 13, 2011 submitted as supplemental information as part of the initial application.

If you have any questions, please call me at (310) 349-2494 or email me at mabdu@rapiscansystems.com.

Sincerely,



Mershad Shahabidin

Rapiscan Safety Officer

Cc:

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