

From: [Lawyer, Dennis](#)
To: ["Charles.M.Reynolds@erdc.dren.mil"](mailto:Charles.M.Reynolds@erdc.dren.mil)
Subject: Department of the Army,, Request for Additional Information Concerning Application for a License Amendment, Control 579945
Date: Thursday, April 25, 2013 1:33:00 PM

Dear Dr. Reynolds,

This is in reference to your letter dated April 23, 2013, responding to our request for information letter dated March 11, 2013. This is in reference to the request to terminate Nuclear Regulatory Commission License No. 28-07946-08, Docket Number 030-36221. In order to continue our review, we need the following additional information:

1. In response to question one section a, you replied with records associated with 10 CFR 20.2003 (disposals to the sanitary sewerage system). You did not, as requested, submit the other records nor explain that such records are not applicable. Please submit the records, or explain why such records are not applicable for unsealed materials with half-lives greater than 120 days, records for disposal made pursuant to 10 CFR 20.2002 (alternate disposal procedures, including burial authorized prior to January 28, 1981), 20.2004 (incineration of wastes), 20.2005 (disposal of specific wastes including liquid scintillation cocktail and animal tissue), and 20.2103(b)(4), evaluations of effluent releases.
2. In response to question number two, you provided statements of scan surveys that were performed. Additional information is needed about the scan surveys:

Lab 140 was shown in the maps designating areas of use. This lab was not scanned with the other laboratories on April 4, 2007. The last survey in this area may have been in the April to July 2006 and would appear to be a routine survey, not one for final status survey. Please perform or produce a survey of Lab 140 which would demonstrate the 100% scan characteristics as stated in found in Figure 8.1 of NUREG-1757 Volume 1, "Consolidated Decommissioning Guidance Decommissioning Process for Materials Licensees."

The January 25, 2013 scan survey does not include the meter, probe type, and calibration date of the instrument. Please include the meter, probe type, and calibration date of the instrument.

The surveys do not appear to include Room 48 where the liquid scintillation counter was located and waste was stored.

3. The simplified survey method stated in Figure 8.1 of NUREG-1757 Volume 1, "Consolidated Decommissioning Guidance Decommissioning Process for Materials Licensees," states to evaluate loose surface by performing a wipe survey of the area. Particular attention should be afforded any drains, air vents, or other fixtures or equipment that may have become contaminated during licensed material use. Please perform wipe surveys and survey of the sink in Lab 178 along with its results.
4. In your letter, you stated that you had not possessed cesium 137. However, in an NRC inspection performed on December 9, 2003, it was stated that you possessed

25 microcuries of unsealed cesium 137. Please ensure the surveys performed are sufficient to detect cesium contamination and is performed in the area that the cesium was stored/used/or controlled.

5. The waste disposal record submitted is incomplete in that it does not contain all the information required in 10 CFR 20.2003. The quantity of licensed or other radioactive material that the licensee releases into the sewer in 1 month divided by the average monthly volume of water released into the sewer by the licensee needs submitted and that it should not exceed the concentration listed in table 3 of appendix B to part 20. Please perform the calculation that divides the average monthly volume when licensed material was disposed to the sanitary sewer.

As there appears to be some items to obtain and I am out of time to complete, please request us to abandon this action, until you obtain the necessary information.

We will continue our review upon receipt of this information. Please reply to my attention at the Region 1 Office and refer to Mail Control No. 579945. If you have technical questions regarding this letter, please call me at (610) 337-5366.

The NRC's Safety Culture Policy Statement became effective in June 2011. While a policy statement and not a regulation, it sets forth the agency's *expectations* for individuals and organizations to establish and maintain a positive safety culture. You can access the policy statement and supporting material that may benefit your organization on NRC's safety culture Web site at <http://www.nrc.gov/about-nrc/regulatory/enforcement/safety-culture.html>. We strongly encourage you to review this material and adapt it to your particular needs in order to develop and maintain a positive safety culture as you engage in NRC-regulated activities.

Please note that you may not reply to this letter by return e-mail. Your reply must be in writing by letter or facsimile (610-337-5269). As this action is at 83 days, we need an immediate reply from you, or we will assume that you do not wish to pursue your application.